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June 16, 2026

Via Electronic Filing

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**Re: Xcel Energy's June 15, 2026 Letter
Docket No. E-002/GR-24-320**

Dear Ms. Bergman:

I write on behalf of the Minnesota Department of Commerce in response to Xcel Energy's June 15 letter and Energy Cents Coalition's June 16 letter. In the June 15 letter, Xcel claims that several proposed decision options would be "financially devastating" and "extremely detrimental to the Company's financial health [and] credit quality."[1] In addition to those general claims, Xcel also asserts that the proposed decision options would force it to write down its asserted interest in the prepaid pension asset.[2] Separately, in the June 16 letter, ECC states that it understands Xcel would commit to funding RAMP through the end of 2028 in exchange for a 9.6% ROE.[3]

Financial Claims

Xcel's financial harm claims deserve skepticism. Xcel made the same arguments in its last multiyear rate case, Docket No. 21-630. There, Xcel claimed that the Commission's return-on-equity decision and related findings would harm the utility in capital markets, weaken its financial position, and create serious financial risks.[4] Objecting to the Commission's decision, Xcel said the ROE determination "negatively impact[ed] the Company," caused its stock price to "drop dramatically," and raised "new questions into the overall constructiveness of Minnesota regulation."[5] Xcel also warned that the utility might struggle to maintain its financial health.[6]

But these predictions were wrong. Instead, Xcel performed well under the rates set in Docket No. 21-630. Since that order, NSPM and XEI have issued several large debt and equity

[1] Xcel Letter at 1 (June 15, 2026) (eDocket no. 20266-232869-01).
[2] *Id.* at 5.
[3] ECC Letter at 2 (June 16, 2026) (eDocket no. 20266-232987-01).
[4] Xcel's 21-630 Recon Pet. at 3–5, 23–27 (Aug. 7, 2023) (eDocket no. 20238-198057-01).
[5] *Id.* at 3–4.
[6] *Id.* at 5.

offerings at favorable rates. These include a $700 million NSPM issuance in early 2024, a $1.2 billion XEI equity issuance later in 2024, and a $1.1 billion NSPM issuance in April 2025.[7] Each offering occurred at rates consistent with, or better than, those available to similar utilities. Rating agencies also maintained or improved NSPM's and XEI's outlooks during this time.[8] Xcel's profitability also increased. Its net income rose by about $220 million from 2023 to 2024.[9] And in October 2025, Xcel's stock reached a record high of $83 per share, even as Xcel again warned that it faced "substantial risk" under existing rates.[10]

Given this pattern, the Commission should place no weight on similar claims now. Xcel's recent financial results show that the utility continues to maintain strong access to capital, stable or improving credit metrics, and solid earnings growth—even after rate outcomes it had previously described as harmful.

Prepaid Pension

Xcel's prepaid pension claims also merit scrutiny.[11] Xcel does correctly identify the court of appeals' holding that "a utility's mandatory contribution to pension plans are an expense of a capital nature to which the Commission must give due consideration."[12] But its narrow focus on shareholder contributions is misplaced.[13] The prepaid pension asset's source determines only whether the asset may be included in rate base at all—not the appropriate rate treatment.[14] In both appeals, the court addressed whether the Commission could exclude prepaid pension from rate base on the grounds that prepaid pension lacks rate base asset characteristics. In both cases, the court concluded that the Commission could not.[15] After making this determination in Xcel's appeal, the court remanded the matter to the Commission to determine whether any prepaid pension should be included in Xcel's rate base.[16] Put another way, the court instructed the

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[7] Ex. Xcel-20 at 18 (Wehner Direct); Ex. Xcel-21 at 6 (Wehner Rebuttal); Evid. Hrg. Tr. Vol. 1 at 43 (Wehner).
[8] Evid. Hrg. Tr. Vol. 1 at 43–44 (Wehner).
[9] Ex. DOC-26 at 49 (Xcel Energy, Inc.'s 2024 Form 10-K showing that Xcel's net income was $1.9 billion in 2024 compared with $1.7 billion in 2024).
[10] *Compare* Xcel Letter at 1 (Oct. 1, 2025) (eDocket no. 202510-223492-01), *with* Ex. DOC-27 at 2 (DOC Request 3118).
[11] The Department is not waiving or conceding other issues raises in Xcel's letter by not addressing them here.
[12] Xcel Letter at 4; *In re Appl. by N. States Power Co.*, No. A23-1672, 2025 WL 249995, at *9 (Minn. Ct. App. Jan. 21, 2025) (citing *In re Appl. by Minn. Power for Auth. to Increase Rates for Elec. Serv.*, 12 N.W.3d 477, 493 (Minn. App. 2024)
[13] Xcel Letter at 4–5.
[14] *In re Appl. by N. States Power Co.*, No. A23-1672, 2025 WL 249995, at *10 (characterizing the extent to which the asset is shareholder-funded as a "threshold question.").
[15] *In re Appl. by Minn. Power for Auth. to Increase Rates for Elec. Serv*, 12 N.W.3d at 493; *In re Appl. by N. States Power Co.*, 2025 WL 249995, at *10.
[16] *In re Appl. by N. States Power Co.*, 2025 WL 249995, at *10.

Commission to accept that prepaid pension can be a capital asset. But the asset's exact dimensions and Xcel's interest in the asset still need to be resolved.

Even if the funding source was dispositive, Xcel cannot demonstrate that shareholders are entitled to the funds. For example, if Xcel went through chapter 7 bankruptcy where its assets were fully liquidated, shareholders – as residual claimants – would still be entitled to nothing.[17] It also doubtful whether Xcel can even credibly claim that shareholders directly funded the contributions.[18] These realities underscore that Xcel's reliance on shareholder contributions as a basis for claiming the prepaid pension asset is unfounded and provides no support for its proposed ratemaking treatment.

Although the Department has some concerns about using a tracker and annual true-up as contemplated in Ham Modified 1006,[19] the Commission could pair this decision option with Department 1006a to address Xcel's existing asset interest. Essentially, the tracker and true-up would prevent Xcel's purported asset interest from growing further while Department 1006a would acknowledge and compensate Xcel for its future possessory interest in the asset.

Finally, Xcel claims that the Commission's proposed decision options would force it to write down its asserted interest in the prepaid pension asset.[20] But Xcel is wrong. To the extent that Xcel has anything to write down, it simply unwinds a bookkeeping entry that Xcel never obtained Commission approval for in the first instance. Thus, in net, there is no demonstration of financial harm to Xcel in the write down of the regulatory asset. Moreover, Xcel's authority to record a regulatory asset is at best doubtful. Xcel never sought Commission approval to recover costs through amortization or to create a regulatory asset.

RAMP Proposal

Finally, the Commission should reject ECC's attempt to trade a 9.6% ROE for Xcel's agreement to provide temporary RAMP funding. Perhaps ECC does not understand the implications of the trade, but it offers terrible ratepayer value. In effect, the Commission would be

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[17] 11 U.S.C. § 541(c)(2); s*ee also In re Springfield Furniture, Inc.*, 145 B.R. 520, 528 (Bankr. E.D. Va. 1992) (explaining that defined benefit pension plan assets were not assets of the debtor's estate under 11 U.S.C. § 541).
[18] Minn. Stat. § 302A.551, subd. 4; *see also Seitz v. Michel*, 181 N.W. 102, 105 (Minn. 1921) (noting that corporate funds "do not belong to the stockholders, but to the corporation"); *Blohm v. Kelly*, 765 N.W.2d 147, 153 (Minn. Ct. App. 2009) (stating that corporate assets belong to the corporation, not its shareholders).
[19] The Commission's legal authority to impose an annual true-up, especially one that persists beyond the defined term of a multiyear rate plan, is unclear. Minn. Stat. § 216B.16, subd. 19(a)(1). Apart from this legal uncertainty, the scale of potential annual surcharges or refunds could be significant. Between 2010 and 2024, customers would have been surcharged up to $50 million each year, with yearly surcharges of $30 million or more regularly occurring. Briefing Papers Vol. 1 at 13.
[20] Xcel Letter at 5.

authorizing Xcel to annually collect about $35 million more in ROE,[21] so that the company will provide $6 million in RAMP funding. That is the equivalent of buying a $250 Vikings ticket to get a "free" magnetic schedule as a stadium giveaway. This proposal, moreover, finds no basis in the *Hope* and *Bluefield* standards. If the Commission believes RAMP should be funded, it should simply authorize Xcel to collect RAMP costs through base rates. It would be less expensive, more transparent, and consistent with applicable ratemaking principles.

In sum, neither Xcel's financial assertions nor its prepaid pension arguments withstand scrutiny. The record demonstrates that Xcel remains financially strong, and its pension-related claims rest on flawed premises. The Commission can therefore proceed confidently in evaluating the proposed decision options on their merits. The Commission likewise should reject ECC's misguided attempt to trade RAMP funding for an ROE increase that lacks record support.

By copy of this letter, all parties have been served. A declaration of service is also enclosed. Thank you for your attention to this matter.

Sincerely,

/s/ **Richard Dornfeld**

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Enclosure

cc: Service List

#6389008

[21] In this case, each additional basis point (0.01%) of authorized ROE adds approximately $985,000 to Xcel's revenue deficiency. Ex. DOC-12 at 43 (Addonizio Direct).

DECLARATION OF SERVICE

Re: ***In the Matter of the Application of Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota***
CAH No. 28-2500-40515; Docket No. E-002/GR-24-320

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, LIZ SODERSTROM, hereby state that on June 16, 2026, I filed by electronic eDockets the attached **Response of Minnesota Department of Commerce to Xcel Energy's June 15 letter and Energy Cents Coalition's June 16 letter**, and eServed and/or sent by U.S. Mail, as noted, to all parties on the attached service list.

See attached service list.

I declare under penalty of perjury that everything I have stated in this document is true and correct.

/s/ Liz Soderstrom

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