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June 8, 2026

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

*Via eDockets*

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

Dear Ms. Bergman:

The Office of the Attorney General—Residential Utilities Division (OAG) submits the following revised and new decision options to clarify certain issues and ensure that the Commission’s decisions are informed by the full record.

***Top-Ten Executive Compensation Metrics***

The briefing papers correctly summarize the OAG’s recommendation that future recovery of compensation paid to Xcel’s highest-paid executives should be tied to ratepayer-focused metrics. Decision option 1061, however, appears to state that the Commission should establish these metrics in the current case, whereas the OAG’s recommendation was to establish them either in a separate docket or in Xcel’s next rate case.<sup>1</sup> To reflect the OAG’s recommendation, the OAG recommends revising decision option 1061 as follows, from which the Commission would need to select one of the bracketed options, depending on its procedural preference:

1061. ~~Establish Performance Incentives Mechanisms which would allow~~ [Delegate authority to the Executive Secretary to establish a separate proceeding to / In Xcel’s next rate case] develop a mechanism to tie recovery of ~~a portion ten top~~ top-ten highest paid executive compensation ~~on condition of to Xcel~~ meeting ratepayer-focused metrics.

***CCOSS Recommendations for Future Cases***

Regarding allocation of demand-related production costs, the OAG’s recommendation for future rate cases is that Xcel use a 12CP allocator based on MISO’s 12 monthly peaks.<sup>2</sup> Further, regardless of whether the allocator for these costs is based on MISO’s single annual peak or 12 monthly peaks, the class load shares should be based on actual class load at the time of the peak(s)

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<sup>1</sup> Ex. OAG-3 at 23 (Hinderlie Surrebuttal).

<sup>2</sup> Ex. OAG-10 at 48 (Scharber Surrebuttal).

used, but the historical class loads should be adjusted to account for forecasted changes in the test year.<sup>3</sup> The OAG recommends the following revised decision options to reflect these recommendations:

4007. Approve OAG's recommendation that the D10S allocator reflect usage at MISO 12CP, rather than the MISO 1-CP peak, in future rate cases.

4008. Order Xcel to use the best available actual system usage at historical peaks, adjusted to account for forecasted class load changes, to calculate the D10S allocator in future rate cases.

The briefing papers correctly note the OAG's support for the Basic Customer and Peak-and-Average methods of classifying distribution-system costs. The OAG also recommended that Xcel be required to file CCOSSES using these methods of classifying distribution costs in its next rate case.<sup>4</sup> The following new decision option reflects that recommendation:

4018a. Require Xcel to file multiple CCOSSES in its next rate case, including studies that classify distribution costs according to the Basic Customer and Peak-and-Average methods.

As the briefing papers correctly note, the OAG opposed Xcel's decision to switch from the R01 allocator to the R02 allocator to allocate economic-development discounts. The OAG's CCOSSES in this case continued to allocate those discounts as Xcel had previously done, using the R01 allocator. However, in surrebuttal testimony, the OAG added a recommendation for Xcel's next rate case to allocate economic-development discounts using an equally weighted average of Xcel's energy and peak-demand allocators.<sup>5</sup> The following new decision option reflects that recommendation:

4025. In its next rate case, Xcel should allocate economic-development discounts costs using an equal weighted average of Xcel's energy and peak-demand allocators.

Sincerely,

/s/ **Peter G. Scholtz**

PETER G. SCHOLTZ

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<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

**CERTIFICATE OF SERVICE**

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

I, JUDY SIGAL, hereby certify that on the 8th day of June, 2026, I e-filed with eDockets *New and Revised Decision Options of the Office of the Attorney General—Residential Utilities Division*, and served a true and correct copy of the same upon all parties listed on the attached Service List by e-mail, electronic submission and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

*/s/ Judy Sigal*  
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JUDY SIGAL

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