

February 17, 2025

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

VIA E-FILING

Re:

In the Matter of Xcel Energy's 2024 Annual
Safety, Reliability, and Service Quality Report

Docket No. E-002/M-25-27

Dear Executive Secretary Bergman,

The Citizens Utility Board of Minnesota ("CUB"), the Minnesota Department of Commerce, Division of Energy Resources ("Department"), the Office of the Attorney General, Residential Utilities Division ("OAG"), the Minnesota Department of Health ("MDH"), the Energy CENTS Coalition ("ECC"), and the Legal Services Advocacy Project ("LSAP") jointly offer this letter in anticipation of the Minnesota Public Utilities Commission's ("Commission") hearing on the above-referenced docket being held on February 19, 2026.

As Commission Staff recognizes in its Briefing Papers, the topic of extreme heat and air quality index ("AQI") protections was addressed separately from other issues related to Northern States Power Co. d/b/a Xcel Energy's ("Xcel" or the "Company") 2024 Annual Safety, Reliability, and Service Quality Report.¹ Those protections were approved by Commission Order on July 25, 2025,² after which Xcel submitted a compliance report detailing its recommended process for reconnecting customers during extreme heat and AQI events.³ Included within that compliance filing were proposed tariff revisions related to communications methodologies and minimum event durations. The Company also introduced for the first time a proposal to charge reconnection fees for the temporary restoration of service under the program.

On January 15, 2026, the Department, CUB, OAG, ECC, and LSAP filed joint comments opposing Xcel's proposal to charge reconnection fees as a condition of temporarily resuming customers' service during extreme heat and unhealthy AQI events.⁴ As discussed in that filing,

¹ *In the Matter of Xcel Energy's 2024 Annual Safety, Reliability, and Service Quality Report*, Docket No. E-002/M-25-27, Staff Briefing Papers – Vol. 3 at 18 (Feb. 6, 2026) (hereinafter "Briefing Papers, Vol. 3").

² *In the Matter of Xcel Energy's 2024 Annual Safety, Reliability, and Service Quality Report*, Docket No. E-002/M-25-27, Commission Order at 1-2 (Jul. 25, 2025).

³ *In the Matter of Xcel Energy's 2024 Annual Safety, Reliability, and Service Quality Report*, Docket No. E-002/M-25-27, Proposed Tariff Modifications for Protections During Extreme Heat and High Air Quality Index Events (Dec. 31, 2025).

⁴ *In the Matter of Xcel Energy's 2024 Annual Safety, Reliability, and Service Quality Report*, Docket No. E-002/M-25-27, Initial Comments of the Citizens Utility Board of Minnesota, the Minnesota Department of

our organizations and agencies view the assessment of such fees as patently unreasonable and inconsistent with purpose of these protections: shielding vulnerable individuals from harmful environmental stressors that negatively impact health and safety.⁵ MDH also supports the waiving of reconnection fees for extreme heat and AQI events and has added their signature to this letter.

Xcel thereafter filed a response indicating it was “willing to waive reconnection fees for customers reconnected under the heat/AQI program if the Commission so directs,” but that the timing of a decision could affect how soon protections could be implemented.⁶ If a decision is issued soon, the Company anticipates minimal delay; if a decision is issued closer to the anticipated May 1 launch date, then Xcel asserts the protections may not be available for an additional 6-8 weeks.⁷

Although the issue of reconnection fees for extreme heat and AQI events was not extensively discussed in the Briefing Papers,⁸ we believe it falls squarely within the scope of the Commission’s hearing planned for February 19, 2026. Given the need for a timely resolution of this issue, we respectfully recommend the Commission deny Xcel’s request to charge reconnection fees during extreme heat and AQI events by adopting the following proposed decision options:

NEW Decision Option 17. Approve Xcel’s tariff revisions as articulated in its December 31, 2025 compliance filing in Docket No. E-002/M-25-27, except as otherwise provided by this Order.

NEW Decision Option 18. Require Xcel to implement the following tariff revisions related to disconnection and reconnection during extreme heat and high air quality events:

1.6 DISCONNECTION AND RECONNECTION DURING EXTREME HEAT

5. Temporary reconnections during extreme heat are not subject to the reconnection charge ~~Customers will be reconnected based upon existing tariff language as noted in the General Rules & Regulations, Section 1.2; inclusive of reconnection fees.~~

1.6 DISCONNECTION AND RECONNECTION DURING HIGH AIR QUALITY EVENTS

5. Temporary reconnections during high air quality events are not subject to the reconnection charge ~~Customers will be reconnected based upon existing tariff language as noted in the General Rules & Regulations, Section 1.2; inclusive of reconnection fees.~~

Commerce, the Office of the Attorney General, the Energy CENTS Coalition, and the Legal Services Advocacy Project (Jan. 15, 2026).

⁵ *Id.* at 2-3.

⁶ *In the Matter of Xcel Energy’s 2024 Annual Safety, Reliability, and Service Quality Report*, Docket No. E-002/M-25-27, Xcel Reply to Initial Comments at 5-7 (Jan. 29, 2026).

⁷ *Id.* at 7.

⁸ *See* Briefing Papers, Vol. 3 at 8, 18 (referencing the compliance filing submitted by Xcel on December 31, 2025, but not discussing the specifics of any reconnection fee proposals).

Sincerely,

February 17, 2026

/s/ Brandon Crawford
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STATE OF MINNESOTA BEFORE THE PUBLIC UTILITIES COMMISSION

In the Matter of Northern States Power
Company d/b/a Xcel Energy's 2024 Annual
Safety, Reliability, and Service Quality Report

Docket No. E-002/M-25-27

CERTIFICATE OF SERVICE

I, Brandon Crawford, hereby certify that I have served a true and correct copy of the following documents to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

1. Letter of the Citizens Utility Board of Minnesota, the Minnesota Department of Commerce, the Office of the Attorney General, the Minnesota Department of Health, the Energy CENTS Coalition, and the Legal Services Advocacy Project

Dated this 17th day of February, 2026.

/s/ Brandon Crawford

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cc: Service Lists

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2	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-27
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 25-27
4	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-27
5	Olivia	Carroll	oliviac@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-27
6	Gabriel	Chan	gabechan@umn.edu			130 Hubert H. Humphrey Center 301 19th Ave S Minneapolis MN, 55455 United States	Electronic Service		No	Official 25-27
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9	Riley	Conlin	riley.conlin@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-27
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16	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 25-27
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26	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 25-27
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35	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 25-27
36	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 25-27
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