



April 10, 2026

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

**VIA E-FILING**

**Re:**

**Xcel Energy's Petition for Approval of  
2023 Annual Fuel Forecast and Monthly  
Fuel Cost Charges**

**MPUC Docket Nos. E-002/AA-22-179  
CAH Docket No. 21-2500-40336**

Dear Ms. Bergman:

CUB submits this letter in response to the March 31, 2026 letter filed by Northern States Power Company, d/b/a Xcel Energy ("Xcel" or the "Company").<sup>1</sup> We appreciate Xcel's willingness to refund ratepayers \$40.6 million to account for the imprudent activity causing or extending 2023 outages at its Prairie Island nuclear facility. We are also open to the Company's proposal for parties to collaboratively "explore developing an agreed-upon methodology for calculating replacement power costs in possible future outage-related proceedings and to report back to the Commission on the status or resolution of such efforts within 90 days of the date of the Commission order approving this agreement."<sup>2</sup>

On the other hand, we strongly oppose Xcel's proposal to strike the majority of the Administrative Law Judge's ("ALJ") Findings of Fact and all of her Conclusions of Law. Adopting this proposal would dismiss the considerable efforts, time, and resources parties put into a contested case and devalue the learnings derived from the ALJ Report. To better explain our opposition to this proposal, we walk back through the procedural history that has led us to this point:

- On March 1, 2024 Xcel filed a petition requesting a true-up of Xcel's 2023 fuel clause charges (the "Annual Report"). In a spreadsheet attached to the Annual Report, Xcel summarized the drilling event that led to the October 2023 outage with this brief statement: "During excavation for cable replacement, an underground horizontal

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<sup>1</sup> *In the Matter of Northern States Power Co., d/b/a Xcel Energy's Petition for Approval of its 2023 Annual Fuel Forecast and Monthly Fuel Cost Charges*, Letter, Docket No. E002/AA-22-179 (March 31, 2026) ("Xcel Exceptions Letter").

<sup>2</sup> *Id.* at 2.

boring machine damaged control cables resulting in the automatic opening of the Unit 1 Output Breakers.”<sup>3</sup>

- That same month, a diligent Department of Commerce (the “Department”) analyst reviewing the Annual Report noticed the disclosure quoted above and sought additional information about it from Xcel. Specifically, the Department asked Xcel to “explain why ratepayers should pay for the Prairie Island 1 outage given the outage appears to be due to Xcel’s mistake[.]”<sup>4</sup>
- In its March 18, 2024 response to the Department, the Company acknowledged that the outage was initially caused by damage to control cables that occurred during a drilling operation, but argued “prudence does not mean perfection” and that, “from an overall operations perspective, the Company has consistently operated [the Prairie Island facility] prudently[.]”<sup>5</sup>
- In a March 21, 2024 Licensee Event Report filed with the Nuclear Regulatory Commission, the Company stated the October 2023 outage “was caused by weakness in the Excavation Permit approval process as well as inadequate oversight of the personnel performing the work.”<sup>6</sup>
- On July 30, 2024, the Company filed comments with the Commission arguing that, despite its role in the outage, “no disallowance is merited” and that “to the extent any refund is required ... it should be reflective of [Prairie Island’s] overall performance compared to other industry participants.”<sup>7</sup> The Company also stated “if the proper calculation of any refund remains in dispute, the Company requests this proceeding be sent to a contested case so that a full record can be developed.”<sup>8</sup>
- At a September 19, 2024 Agenda Meeting, representatives from the Department, CUB, the Office of the Attorney General, Residential Utilities Division (“OAG”), and Xcel offered differing perspectives on the need for a contested case proceeding to determine an appropriate refund amount owed to ratepayers:
  - The Department argued that “the Commission has today in front of it all the information it needs to decide the dispute that is before [it]” and that “there is no reason to invest the time and the money into a [contested case] process where we have the facts that are necessary to determine these issues.”<sup>9</sup> The Department warned, however, that if the matter were referred to the CAH for

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<sup>3</sup> *In the Matter of Northern States Power Co., d/b/a Xcel Energy’s Petition for Approval of its 2023 Annual Fuel Forecast and Monthly Fuel Cost Charges*, Annual True-Up Compliance Report, Docket No. E002/AA-22-179 (March 1, 2024) (“Xcel Annual Report”).

<sup>4</sup> *Id.* at Attachment DOC-1.

<sup>5</sup> Xcel response to Department Information Request No. 13, Docket No. E002/AA-22-179 (March 18, 2024) (internal citations omitted), p. 3.

<sup>6</sup> Prairie Island Nuclear Generating Plant Unit 1 Licensee Event Report, Docket No. 24-26 (March 21, 2024).

<sup>7</sup> *In the Matter of Northern States Power Co., d/b/a Xcel Energy’s Petition for Approval of its 2023 Annual Fuel Forecast and Monthly Fuel Cost Charges*, Docket No. E002/AA-22-179, Xcel Reply Comments, p. 7 (July 30, 2024).

<sup>8</sup> *Id.* at 8.

<sup>9</sup> Minnesota Public Utilities Commission, September 19, 2024 Agenda Meeting Webcast at 2:11:10.

a contested case, the Department would advocate for whatever refund amount was supported by the evidence developed in that proceeding.<sup>10</sup>

- The OAG stated it “would hold Xcel to its burden of proof on [outage costs] if the Commission refers any part of this case to the [CAH].”<sup>11</sup> The OAG also recommended that the Commission require Xcel to track its costs related to the contested case, including attorney and expert witness fees, and to exclude them from future cost recovery requests because “it would simply not be just and reasonable for ratepayers to pay for Xcel’s litigation expenses to defend giving its contractors wrong maps and incurring millions of dollars in replacement power costs.”<sup>12</sup>
- CUB also argued that “referring this matter to a contested case is not necessary” because there is “sufficient evidence on the record for the Commission to decide . . . an appropriate amount to be refunded to customers.”<sup>13</sup>
- In contrast to these positions, the Company used its opening statement to dispute it acted imprudently in causing the October 2023 outage and to suggest other parties unfairly “urged the Commission... to order [Xcel] to refund this money spent for replacement power without giving [Xcel] the benefit of a contested case proceeding.”<sup>14</sup>
- As memorialized in its November 15, 2024 written order, the Commission determined that the October 2023 outage at Prairie Island “resulted from Xcel’s imprudence, and it is not appropriate for the Company to recover all of its claimed outage-related fuel costs.”<sup>15</sup> The Commission also found that further record development was necessary to determine the impact of the outage on the power costs paid by customers and whether potential benefits or offsets should be considered before requiring any refund of costs incurred during the outage.<sup>16</sup> Xcel, the Department, OAG, CUB, and the Xcel Large Industrials (“XLI”) became parties to the ensuing contested case proceeding.
- In the contested case, Xcel filed testimony from four experts (including two outside experts, one of which the ALJ later found to be not credible) and engaged two senior attorneys from a top law firm to assist two of the Company’s internal attorneys. Xcel

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<sup>10</sup> *Id.*

<sup>11</sup> *Id.* at 2:09:30.

<sup>12</sup> *Id.* at 2:10.

<sup>13</sup> *Id.* at 2:06:20

<sup>14</sup> *Id.* at 2:01:55.

<sup>15</sup> *In the Matter of Northern States Power Co., d/b/a Xcel Energy's Petition for Approval of its 2023 Annual Fuel Forecast and Monthly Fuel Cost Charges*, Order, Docket No. E002/AA-22-179 (Nov. 15, 2024), p. 2.

<sup>16</sup> *Id.*

ultimately argued that any refund owed to ratepayers should be limited to “\$7.4 million, and at most \$12.8 million, plus interest.”<sup>17</sup>

- Meanwhile, the other parties to this proceeding spent considerable time and resources countering Xcel’s case with their own evidence, analyses, and counterproposals. Ultimately, the Department recommended that ratepayers be refunded “at least \$40.1 million, plus interest;”<sup>18</sup> the OAG recommended ratepayers be refunded \$40.6 million plus interest;<sup>19</sup> CUB recommended ratepayers be refunded “\$40.1 million to \$40.6 million, plus interest;”<sup>20</sup> and XLI recommended ratepayers be refunded \$40.6 million, plus interest.<sup>21</sup>
- On March 11, 2026, the ALJ issued her Findings of Fact, Conclusions of Law and Recommendations (the “Report”). In it, the ALJ recommended that the Commission:
  - Adopt the Findings of Fact, Conclusions of Law, and Recommendations as set forth herein;
  - Order Xcel to refund \$40.6 million plus interest at the prime rate, compounded monthly until the refund is fully paid;
  - Bar Xcel from recovering from ratepayers the costs of this contested-case litigation;
  - Order Xcel to make a compliance filing listing all costs that Xcel incurred in litigating this contested case, including internal employee labor and overhead; and
  - Require Xcel, in any future rate case or cost-recovery proceeding that relies on actual cost data, to show that the internal and external costs for this contested case have been adjusted out of the test year(s) or otherwise removed.
- On March 31, 2026, Xcel filed a letter with the Commission noting its strong disagreement with the ALJ’s ultimate conclusions and recommendations but conceding to refund ratepayers \$40.6 million consistent with the ALJ’s recommendation. Arguing that its proposal “renders many of the ALJ’s findings unnecessary,” Xcel requested, without further justification, that the majority of the ALJ’s findings and all of her conclusions of law be struck from the Report.

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<sup>17</sup> *In the Matter of Northern States Power Co., d/b/a Xcel Energy’s Petition for Approval of its 2023 Annual Fuel Forecast and Monthly Fuel Cost Charges*, Xcel Reply Brief, Docket No. E002/AA-22-179 (Jan. 8, 2026), p. 5.

<sup>18</sup> *In the Matter of Northern States Power Co., d/b/a Xcel Energy’s Petition for Approval of its 2023 Annual Fuel Forecast and Monthly Fuel Cost Charges*, Department Reply Brief, Docket No. E002/AA-22-179 (Jan. 8, 2026), p. 4.

<sup>19</sup> *In the Matter of Northern States Power Co., d/b/a Xcel Energy’s Petition for Approval of its 2023 Annual Fuel Forecast and Monthly Fuel Cost Charges*, OAG Reply Brief, Docket No. E002/AA-22-179 (Jan. 8, 2026), p. 11.

<sup>20</sup> *In the Matter of Northern States Power Co., d/b/a Xcel Energy’s Petition for Approval of its 2023 Annual Fuel Forecast and Monthly Fuel Cost Charges*, CUB Reply Brief, Docket No. E002/AA-22-179 (Jan. 8, 2026), p. 7.

<sup>21</sup> *In the Matter of Northern States Power Co., d/b/a Xcel Energy’s Petition for Approval of its 2023 Annual Fuel Forecast and Monthly Fuel Cost Charges*, XLI Reply Brief, Docket No. E002/AA-22-179 (Jan. 8, 2026), p. 12.

We understand Xcel does not agree with the outcome of the contested case proceeding. And, again, we appreciate the Company's willingness, despite that disagreement, to now refund ratepayers the amount recommended by the ALJ. However, we find audacious Xcel's proposal to replace the bulk of the substantive contents of the ALJ Report with the Company's own minimalistic language. In effect, Xcel's proposal would preserve some of the ALJ's findings grounded primarily in the testimonies of Xcel witnesses Krug and Detmer but strike almost all of the ALJ's substantive findings citing and explaining her analysis of other parties' witnesses' testimony. Xcel has offered no justification for the Commission to ignore that evidence. Without that justification, it is unclear to us why or how the Commission would explain why it would not consider that evidence when making and explaining its final decision on this matter.

We are also troubled by some of Xcel's proposed Commission order points that suggest "agreement" has been reached. (E.g., Xcel proposes that the Commission require the Company to make a compliance filing no later than 30 days from the date of the Commission's order "approving this agreement.") The ALJ Report is the product of a 16-month contested case proceeding—one that Xcel requested and other parties sought to avoid—to resolve *disagreement* over the appropriate refund amount. From the moment this regulatory process started through March 2026, Xcel disagreed that it should pay anywhere close to the refund amount the ALJ recommends it now be ordered to pay. Relatedly, reframing the outcome of this proceeding at the eleventh hour as the *Commission* agreeing to "[accept] Xcel's proposal to refund customers \$40.6 million plus interest" would discard the ALJ's detailed, evidence-based justification for recommending that the Commission *order* that result after Xcel spent two years fighting to avoid it.

This case presents an important opportunity for the Commission to make clear to the public the role it and others play in protecting ratepayers from paying more than they should for utility service—especially when those costs arise from utility imprudence. But for the Department's diligent analysis of a routine compliance filing, ratepayers would have unknowingly paid for replacement power costs Xcel incurred after it imprudently failed to inform workers of buried cables at Xcel's nuclear generation facility. And, but for multiple parties' significant efforts to build out an evidentiary record and advocate for ratepayers' interests in the contested case, Xcel would likely not have "agreed" to pay a refund anywhere close to the \$40.6 million recommended by the ALJ. We believe it is in the public interest for the Commission to highlight, not hide, these facts. The best way to do that is to adopt the ALJ Report in full.

In light of the foregoing, CUB recommends that the Commission:

1. Adopt the ALJ's Findings of Fact, Conclusions of Law, and Recommendations in full;
2. Order Xcel to refund \$40.6 million plus interest at the prime rate, compounded monthly until the refund is fully paid;
3. Require the Company to make a compliance filing no later than 30 days from the date of the Commission's order setting forth the full refund amount, including interest, as well as the anticipated refund date;

4. Require the Company to work cooperatively with the other parties in this docket to explore developing an agreed-upon methodology for calculating replacement power costs in future outage-related proceedings and report back to the Commission on the status or resolution of such efforts within 90 days of the date of the Commission order;
5. Bar Xcel from recovering from ratepayers the costs of this contested-case litigation;
6. Order Xcel to make a compliance filing listing all costs that Xcel incurred in litigating this contested case, including internal employee labor and overhead; and
7. Require Xcel, in any future rate case or cost-recovery proceeding that relies on actual cost data, to show that the internal and external costs for this contested case have been adjusted out of the test year(s) or otherwise removed.

Sincerely,

/s/ Brian Edstrom

Brian Edstrom

Senior Regulatory Advocate

Citizens Utility Board of Minnesota

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**CERTIFICATE OF SERVICE**

**Xcel Energy's Petition for Approval of  
2023 Annual Fuel Forecast and Monthly  
Fuel Cost Charges**

**MPUC Docket Nos. E-002/AA-22-179  
CAH Docket No. 21-2500-40336**

I, Brian Edstrom, 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

Dated this 10th day of April, 2026.

/s/ Brian Edstrom

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