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Minneapolis, MN 55401

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June 26, 2025

—Via Electronic Filing—

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

RE: SUPPLEMENTAL FILING
RENEWABLE*CONNECT PILOT, FLEX AND, LONG TERM PROGRAMS
DOCKET NO. E002/M-25-184

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Supplement to our June 12, 2025 Reply Comments in the above-referenced docket to provide our responses to Department of Commerce, Division of Energy Resources (DOC) Information Request Nos. 1 and 2 on the record. We provide these as Attachments 1 and 2 to this Supplement, respectively.

The live versions of the Renewable*Connect Flex Rate Calculation Model (DOC IR No. 1, Attachment A) and Renewable*Connect Trackers Model (DOC IR No. 2, Attachment A) are marked “NOT PUBLIC IN ENTIRETY” as they include confidential information. Xcel Energy maintains these models as trade secret pursuant to Minn. Stat. §13.37, subd. 1(b) based on its economic value from not being generally known and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use. Parts of the model also contain not-public data on purchase power agreement prices, forecasted production, and forecasted usage. Xcel Energy maintains this information as a trade secret pursuant to Minn. Rule 7829.0500, subp 3.

1. **Nature of the Material:** The Renewable*Connect Flex Rate Calculation Model is an Excel spreadsheet tool used to calculate the Renewable*Connect Flex Rate based primarily on forecasted usage, forecasted production, forecasted system rates, and purchased power agreement prices. The Renewable*Connect Trackers Model is an Excel spreadsheet tool used to

create the trackers for the Renewable*Connect Programs based on actual expenses, payments from customers, production, and production requirements.

2. **Authors:** Xcel Energy Pricing personnel
3. **Importance:** The Renewable*Connect Flex Rate Calculation Model represents Company work product that Xcel Energy maintains as a trade secret and also includes not-public data that includes purchase power agreement prices, forecasted production, and forecasted usage, and thus Xcel Energy protects it from public disclosure. The Renewable*Connect Trackers Model represents Company work product that Xcel Energy maintains as a trade secret and also includes not-public data that includes expenses, payments from customers, production, and production requirements, and thus Xcel Energy protects it from public disclosure.
4. **Date the Information was Prepared:** First quarter 2025

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. If you have any questions regarding this filing, please contact Nathan Kostiuk at Nathan.c.kostiuk@xcelenergy.com or me at Rebecca.d.eilers@xcelenergy.com.

Sincerely,

/s/

REBECCA EILERS
MANAGER, REGULATORY AFFAIRS

Enclosures
c: Service List

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Xcel Energy Information Request No. 1
Docket No.: E002/M-25-184
Response To: Minnesota Department of Commerce
Requestor: Andy Bahn & Rachel Wiedewitsch
Date Received: May 30, 2025

Question:

Topic: Annual Report Renewable*Connect Pilot, Flex, and Long-Term Programs
Reference(s): Attachment D

Please provide a detailed explanation of the calculations utilized in Xcel's Attachment D for its Annual Report, including an explanation for how each line item is calculated. Please provide a live Xcel spreadsheet, with equations intact, showing the calculations of Attachment D.

If the requested spreadsheets pull data from any other spreadsheets, please provide those live spreadsheets (with equations intact) as well.

Response:

Please see Attachment A to this response.

The Blended Resource Cost is calculated using forecasted production, PPA pricing for PPA resources, and the forecasted system energy price. See tab "Resource Cost-TSD."

The Capacity Credit calculates avoided capacity costs for wind and solar using the CT resource cost, MISO capacity factors, and resource capacity. The calculation then puts the capacity credit cost on a per kWh basis by dividing by the Renewable*Connect production forecast. See tab "Capacity Credit-TSD."

The Neutrality Charge calculation is shown on tab "Neutrality Charges." It sums the Line Losses (calculated on tab "Resource Cost-TSD"), Curtailment (also calculated on tab "Resource Cost-TSD"), Balancing (calculated on tab "Balancing Detail") with the Wind Integration, Coal Cycling, and Congestion rates determined when the Flex calculation was created.

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The Administrative Cost was set at 0.15 cents per kWh.

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1. **Nature of the Material:** The Renewable*Connect Flex Rate Calculation Model is an Excel spreadsheet tool used to calculate the Renewable*Connect Flex Rate based primarily on forecasted usage, forecasted production, forecasted system rates, and purchased power agreement prices.
2. **Authors:** Xcel Energy Pricing personnel
3. **Importance:** The Renewable*Connect Flex Rate Calculation Model represents Company work product that Xcel Energy maintains as a trade secret and also includes not-public data that includes purchase power agreement prices, forecasted production, and forecasted usage, and thus Xcel Energy protects it from public disclosure.
4. **Date the Information was Prepared:** Q1 2025

Preparer: Martha Hoschmiller
Title: Principal Pricing Analyst
Department: NSPM Regulatory
Telephone: 612-330-5973
Date: June 9, 2025

Northern States Power Company

Docket No. E002/M-25-184
DOC IR No. 1
Attachment A – Page 1 of 1

**Attachment A is considered
Trade Secret in Entirety.**

The live version of Attachment A - Renewable*Connect Flex Rate Calculation Model is marked “NOT PUBLIC IN ENTIRETY” as it includes confidential information. Xcel Energy maintains this model as a trade secret pursuant to Minn. Stat. §13.37, subd. 1(b) based on its economic value from not being generally known and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use. Parts of the model also contain not-public data on purchase power agreement prices, forecasted production, and forecasted usage. Xcel Energy maintains this information as a trade secret pursuant to Minn. Rule 7829.0500, subp 3.

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Xcel Energy

Information Request No.

2

Docket No.: E002/M-25-184

Response To: Minnesota Department of Commerce

Requestor: Andy Bahn & Rachel Wiedewitsch

Date Received: May 30, 2025

Question:

Topic: Annual Report Renewable*Connect Pilot, Flex, and Long-Term Programs

Reference(s): Attachments A through C

Please provide live excel spreadsheets, with equations intact, of Attachments A, B, and C to Xcel's Annual Report. If the requested spreadsheets pull data from any other spreadsheets, please provide those live spreadsheets (with equations intact) as well.

Response:

Please see Attachment A to this response.

The live version of Attachment A - Renewable*Connect Trackers Model is marked "NOT PUBLIC IN ENTIRETY" as it includes confidential information. Xcel Energy maintains this model as a trade secret pursuant to Minn. Stat. §13.37, subd. 1(b) based on its economic value from not being generally known and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use. Parts of the model also contain not-public data on expenses, payments from customers, production, and production requirements. Xcel Energy maintains this information as a trade secret pursuant to Minn. Rule 7829.0500, subp 3.

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4. Date the Information was Prepared: Q1 2025

Preparer: Martha Hoschmiller
Title: Principal Pricing Analyst
Department: NSPM Regulatory
Telephone: 612-330-5973
Date: June 9, 2025

Northern States Power Company

Docket No. E002/M-25-184

DOC IR No. 2

Attachment A – Page 1 of 1

**Attachment A is considered
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4. **Date the Information was Prepared:** Q1 2025

CERTIFICATE OF SERVICE

I, Christine Schwartz, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped
with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET No. E002/M-25-184

Dated this 26th day of June 2025

/s/

Christine Schwartz
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-184
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5	John	Coffman	john@johncoffman.net	AARP		871 Tuxedo Blvd. St, Louis MO, 63119-2044 United States	Electronic Service		No	M-25-184
6	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-184
7	William	Crider	william.crider@target.com	Target Corporation		33 S 6th St CC-2805 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-184
8	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-184
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10	Christopher	Droske	christopher.droske@minneapolismn.gov	Northern States Power Company dba Xcel Energy-Elec		661 5th Ave N Minneapolis MN, 55405 United States	Electronic Service		No	M-25-184
11	John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance		2720 E. 22nd St Institute for Local Self-Reliance Minneapolis MN, 55406 United States	Electronic Service		No	M-25-184
12	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	M-25-184
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15	S	Holly	4358@brainerd.net	Sorgo Fuels and Chemicals, Inc.		34332 Sunrise Blvd Crosslake MN, 56442 United States	Electronic Service		No	M-25-184
16	Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.		445 Etna Street Ste. 61 St. Paul MN, 55106 United States	Electronic Service		No	M-25-184
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23	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-184
24	Thomas	Melone	thomas.melone@allcous.com	Minnesota Go Solar LLC		222 South 9th Street Suite 1600 Minneapolis MN, 55120 United States	Electronic Service		No	M-25-184
25	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	M-25-184
26	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-184
27	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200	Electronic Service		No	M-25-184

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29	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	M-25- 184
30	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	M-25- 184
31	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	M-25- 184
32	Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 5 Minneapolis MN, 55401 United States	Electronic Service		No	M-25- 184
33	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07- MCA Minneapolis MN, 55401- 1993 United States	Electronic Service		Yes	M-25- 184
34	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	M-25- 184
35	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25- 184
36	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	M-25- 184
37	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	M-25- 184
38	Carla	Vita	carla.vita@state.mn.us	MN DEED		Great Northern Building 12th Floor 180 East Fifth Street St. Paul MN, 55101 United States	Electronic Service		No	M-25- 184
39	Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind		618 2nd Ave SE Minneapolis MN, 55414 United States	Electronic Service		No	M-25- 184

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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41	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	M-25-184
42	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-184