



414 Nicollet Mall
Minneapolis, MN 55401

June 30, 2026

—Via Electronic Filing—

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

RE: NEW DECISION OPTION
IN THE MATTER OF A VERIFIED COMPLAINT OF HENNEPIN COUNTY AGAINST
NORTHERN STATES POWER COMPANY UNDER MINN. STAT. § 216B.164
DOCKET NO. E002/C-25-435

Dear Ms. Bergman:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission a new Decision Option for consideration at the Commission's July 2, 2026 Agenda Meeting in the above-referenced docket.

The Company proposes a new Decision Option No. 7 as set forth below to dismiss the current complaint without prejudice, refer the core issue on application of the FERC one-mile rule to the various capacity limits set forth in Minn. R. 7835, and the new docket would be a generic proceeding that includes all utilities and cooperatives. The March 13 Initial Comments of the Joint Solar Parties, at page 4, point out that other utilities and cooperatives employ the same one-mile rule application as Xcel Energy. Accordingly, resolution of the current issue should be held in a docket that includes other utilities and cooperatives so that their voices are heard and that the application of the Commission's determination can have state-wide effect. A similar approach was taken by the Commission on challenges by MnSEIA to the definition of "capacity" in the Dakota Electric Technical Specifications Manual (TSM), resulting in the opening of Docket Nos. E002, E111, E017, E015/CI-24-200 and E999/R-25-86. Xcel Energy would then use the outcome of that new docket to determine treatment of the Hennepin County PV systems at issue here and depending on the outcome provide a true-up to Hennepin County.

Xcel Energy New Decision Option 7

The Commission dismisses the Hennepin County complaint without prejudice and hereby delegates authority to the Executive Secretary to open a new proceeding open to all utilities and cooperatives to clarify whether the FERC one-mile rule should be applied to the various capacity limits set forth in Minn. R. 7835. (Xcel Energy)

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. Please contact Kristen Ruud at 612-216-7979 or kristen.s.ruud@xcelenergy.com or me at ashley.a.adams@xcelenergy.com or 715-852-5814.

Sincerely,

/s/

ASHLEY ADAMS
MANAGER, DISTRIBUTION REGULATORY STRATEGY

cc: Service List

CERTIFICATE OF SERVICE

I, Victor Barreiro, 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/C-25-435

Dated this 30th day of June 2026

/s/

Victor Barreiro
Regulatory Administrator

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 25-435
15	Rebecca	Holschuh	rebecca.holschuh@hennepin.us	Hennepin County, Minnesota		A-1300 Government Center 300 South Sixth Street Minneapolis MN, 55441 United States	Electronic Service		No	Official 25-435
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	Official 25-435
17	Frank	Hornstein	frank.hornstein@minneapolismn.gov	City of Minneapolis		350 South 5th Street Minneapolis MN, 55415 United States	Electronic Service		No	Official 25-435
18	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	Official 25-435
19	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-435
20	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-435
21	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	Official 25-435
22	Farid	Khosravi	farid.khosravi@akerman.com	Akerman LLP		999 Peachtree Street NE Suite 1700 Atlanta GA, 30309 United States	Electronic Service		No	Official 25-435
23	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 25-435
24	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	Official 25-435
25	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	Official 25-435
26	Paul	Merwin	pmerwin@lmc.org	League of Minnesota		145 University Avenue West	Electronic Service		No	Official 25-435

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				Cities		Saint Paul MN, 55103 United States				
27	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-435
28	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-435
29	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	Official 25-435
30	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	Official 25-435
31	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 25-435
32	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	Official 25-435
33	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	Official 25-435
34	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-435
35	AJ	Van de Berghe	aj.vandenberghe@hennepin.us	Hennepin County, Minnesota		300 South Sixth Street Mail Code 228 Minneapolis MN, 55487 United States	Electronic Service		No	Official 25-435
36	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	Official 25-435
37	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-435
38	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN,	Electronic Service		No	Official 25-435

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39	Patrick	Zomer	pzomer@cozen.com	Cozen O'Connor		150 S. 5th Street, #1200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-435