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Xcel Energy Data Request No. 3-1  
Docket No.: EL25-020  
Response To: South Dakota Public Utilities Commission  
Requestor: Eric Paulson  
Date Received: October 28, 2025

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Question:

Refer to the response to DR2-2. The response states 2025 had 4 events which is 2 fewer than the previous year. The response to DR1-14 shows significant increases in control events so far in 2025 compared to 2024. If 2024 had more elevated system conditions than 2025 why were more controlled events not implemented in 2024?

Response:

The “elevated system conditions” referred to in our response to DR2-2 relates to a notification of system concern such as a geo-magnetic disturbance or extreme heat; these are not declared events for demand response control. MISO demand response events are declared only during a Max Gen EEA-2 event. As stated in response to DR2-2, none of the events declared by MISO were Max EEA-2 events, so all interruptions in 2024 and 2025 were initiated by Xcel Energy as a result of the “elevated system condition” notices.

For 2025, these events were initiated based on the resources available to meet our load obligations with a result of being a net buyer in the market during periods of elevated system conditions and market pricing in MISO. While Max Gen Events in MISO did not increase from 2024 to 2025, summer on-peak market prices increased 77% year over year. Therefore, we activated our NSP load programs to lower costs to customers.

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Preparer: Patrik Ronnings  
Title: Sr Product Portfolio Manager  
Department: Customer Energy & Transportation Solutions  
Telephone: 612-330-5787  
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