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Xcel Energy	Data Request No.	1-3
Docket No.: EL25-032		
Response To: South Dakota Public Utilities Commission		
Requestor: Jennie Fuerst		
Date Received: October 30, 2025		

Question:

Refer to page 2 of the Petition sub part (6). Provide a list of the pertinent factors referenced in the petition and how they support the ability of Xcel Energy to provide such service.

Response:

The final factor set forth in SDCL 49-34A-56—“[a]ny and all pertinent factors affecting the ability of the utility to furnish adequate electric service to fulfill customers’ requirements”—is a catch-all that permits the Commission to consider other information relevant to a petitioner’s request for electric service from a non-assigned utility. Here, other pertinent facts that support the Petition include:

1. Xcel Energy needs to make minimal changes to its existing capabilities to serve the new load. As discussed in Xcel Energy’s response to SDPUC DR Nos. 1-1 and 1-2, Xcel Energy needs to construct only transmission level infrastructure and does not need to construct new substations transformers. It is Xcel Energy’s understanding that this is significantly less construction than would be required of the assigned utility.
2. Assigning Xcel Energy would avoid duplication of services. It is Xcel Energy’s understanding based on the information available to it that the assigned utility does not currently have capacity to serve Knife River’s load. Xcel Energy has the capacity to serve the load. Therefore, assigning the new location to Xcel Energy serves the intent of the South Dakota territorial Integrity Act’s policy of eliminating duplicative and wasteful spending in all segments of the electric utility industry. *See In re Declaratory Ruling of Northwestern Pub. Serv. Co.*, 1997 SD 35, 15; 560 N.W.2d 925, 927 (SD 1997).
3. Granting the Petition would also benefit Xcel Energy’s existing customers. First, the additional load would be taking service at tariffed rates, thereby increasing the amount of billing determinants through which Xcel Energy would recover its revenue requirement. Second, the additional infrastructure Xcel Energy would

install to serve Knife River's load would strengthen the grid in that area. Xcel Energy serves the Brandon, Corson, and Garretson South Dakota areas, which are all near the planned Knife River plant. The addition of 34.5 kV line would shore up reliability in all three of the areas by adding operational flexibility, which allows for better movement of load when needed. It would also shore up backup capability with other Lawrence distribution feeders and provide better support to adjacent feeders out of the South Renner Substation.

4. Xcel Energy would not require a contribution in aid of construction ("CIAC") payment for the infrastructure needed to serve Knife River's new plant. At the existing tariff rates and at the assumed load factor of the Plant, the infrastructure build is cost justified by the new revenue, and therefore, no CIAC is required. It is Xcel Energy's understanding that Sioux Valley would have required a CIAC be made for the infrastructure needed for Sioux Valley to serve the Plant.
5. The costs for Xcel Energy to construct the transmission level infrastructure would not be borne by Xcel Energy's existing customers.
6. It is Xcel Energy's understanding that it would be able to commence service to Knife River's new location more quickly than Sioux Valley.

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