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Xcel Energy Data Request No. 1-9  
 Docket No.: GE20-002  
 Response To: South Dakota Public Utilities Commission  
 Requestor: Commission Staff  
 Date Received: May 8, 2020

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Question:

Has the Company made any charitable contributions during this time related to the COVID-19 crisis? If so:

- a. How much money was given and to whom was it given?
- b. Has the company considered having this shareholder expense cover bad debt expense instead of to the charities it was given? Explain why or why not.

Response:

- a. Xcel Energy and the Xcel Energy Foundation utilized funds that were already earmarked for charitable purposes in response to the COVID-19 crisis. The Foundation is a separate, legal entity from Xcel Energy and is solely funded by Xcel Energy with an annual donation. Below you will find the requested information split up by what came from Xcel Energy and what came from the Foundation.

COVID-19 charitable contributions from Xcel Energy in South Dakota totaled \$25,000 (all funds listed below came from budgets already earmarked to be used for charitable contributions in 2020).

ORGANIZATION	GRANT AMOUNT
<b>Banquet</b>	\$6,300
<b>Sioux Falls Area Community Foundation</b>	\$6,200
<b>Sanford Emerging Threats Fund</b>	\$5,000
<b>Avera Heroes – Frontline Work Assistance</b>	\$5,000
<b>Harrisburg Community Foundation</b>	\$2,500

COVID-19 charitable contributions from the Foundation in South Dakota totaled \$11,628. The Foundation provided an additional \$7,560 to South Dakota's regular grant budget to increase grant amounts for existing nonprofit partners. We are still reviewing applications, and grant awards will not be finalized until the beginning of June 2020. Additionally, South Dakota received \$2,268 as part of a larger amount the Foundation pledged to address food insecurity within the eight states served by Xcel Energy. The Foundation also instituted a special 2-for-1 matching campaign for employees which resulted in \$1,800 in matches to South Dakota agencies.

<b>ORGANIZATION</b>	<b>GRANT AMOUNT</b>
<b>Additional grant dollars for existing grant partners</b>	\$7,560
<b>Feeding South Dakota</b>	\$2,268
<b>Employee donations resulted in matching funds to the following organizations:</b>	
<b>Dells Area Health Center</b>	\$1,000
<b>South Dakota State University</b>	\$500
<b>The Evangelical Lutheran Good Samaritan Society</b>	\$200
<b>St Francis Mission Foundation</b>	\$100

- b. No. The funds that are in the Xcel Energy Foundation can only be used for charitable purposes, and due to IRS Self-Dealing Regulations it is illegal to transfer funds from the Foundation back to the Company for any reason. The funds that came from the Company were already earmarked for charitable giving prior to the COVID-19 crisis and would have been used for other charitable purposes had this crisis not happened. There are many regulations when giving from a Foundation. Having funds also budgeted from the Company allows us flexibility in giving that we would not have if we solely used Foundation funds.

For more information on self-dealing regulations please visit:

<https://www.irs.gov/charities-non-profits/private-foundations/acts-of-self-dealing-by-private-foundation>.

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