



Political Contributions Report

Role of the Governance, Compensation and Nominating Committee (“GCN”)

The Governance, Compensation and Nominating Committee (“GCN”) conducts an annual review of the lobbying expenditures that are made and political contributions that are given under the Political Contributions, Lobbying and Government Communications Policy (3.8, “Political Contributions Policy”). The GCN Committee then gives recommendations, if needed, to the full board if there is a required change to the process or policy.

Key Takeaways

- Lobbying expenses increased marginally in 2019 compared to 2018
- 527 group contributions declined in 2019

2019 Campaign Contributions

Political Action Committees

Xcel Energy is compliant with reporting of all Political Action Committee (“PAC”) receipts and donations. Xcel Energy has six state PACs and one federal PAC. Each PAC has a governing board that is made up of employees, and each PAC is funded through voluntary contributions made by eligible employees.

Candidate Campaign Contributions

- No corporate funds were given to individual political campaigns and no corporate funds were used for independent expenditures advocating for or against a candidate in 2019.

Ballot Measure Campaign Contributions

- \$2,500 to the campaign to support Texas Proposition 8 (created the Flood Infrastructure Fund for a statewide, cooperative effort for regional flood planning, mitigation and infrastructure projects).
- \$25,000 to “No on Initiative 300” (Denver “camping ban” measure)
- \$10,000 to “Yes on Prop CC” (Colorado Speaker of the House initiative to allow the state to retain revenue for education and transportation)

2019 Corporate Contributions to 527 Organizations

Xcel Energy may contribute to groups organized and operating under Section 527 of the Internal Revenue Code. Contributions to these groups can be done through the approval process outlined in the Political Contributions Policy and are to be disclosed annually. The 2019 corporate contributions to 527 organizations are detailed below.

Recipient	Contribution
Democratic Governors Association	\$100,000
Democratic Legislative Campaign Committee	\$25,000
GOPAC	\$10,000
Republican Governors Association	\$100,000
Republican Legislative Campaign Committee	\$25,000
Texas House Republican Caucus	\$2,500
2019 Total	\$262,500
2018 Total	\$301,000

Contributions to Trade Associations

Xcel Energy belongs to many trade associations, some of which engage in lobbying activities. For federal income tax purposes, these organizations are required to report the portion of our dues that are not tax exempt under §162(e) of the IRS code. The trade associations below have informed the company that the following dollar amounts are not deductible.

The Political Contributions Policy requires Xcel Energy to publicly report the portion of dues paid to trade associations above a minimal amount that are not tax deductible because they were used by the association for lobbying. This report lags one year because the data for the most recent year are not available until spring.

Xcel Energy's Trade Association Dues Subject to §162(e) (2018 data)

Recipient	Amount
Amarillo Chamber of Commerce	\$690
American Benefits Council	\$8,400
American Gas Association	\$17,747
American Wind Energy Association	\$20,000
Association of Electric Companies of Texas	\$75,555
Colorado Chamber of Commerce	\$17,903
Colorado Competitive Council	\$9,750
Colorado Concern	\$1,100
Colorado Oil And Gas Association (COGA)	\$744
Consumer Energy Alliance (CEA)	\$300
Denver Metro Chamber of Commerce	\$6,906
Edison Electric Institute	\$269,973
Grand Forks Chamber	\$214
Minneapolis Regional Chamber	\$3,500
Minnesota Business Partnership	\$51,897
Minnesota Center for Fiscal Excellence	\$1,280
Minnesota High Tech Association	\$1,200
Minnesota Resource Recovery Association	\$2,573
Minnesota Utility Investors	\$46,025
Minot Area Chamber of Commerce	\$296
National Petroleum Council	\$503
North American Electric Reliability Corporation	\$57
Our Colorado Values	\$10,000
Saint Paul Area Chamber of Commerce	\$9,000
South Dakota Chamber of Commerce and Industry	\$440
South Dakota Electric Utility Companies	\$30,434
South Metro Denver Chamber of Commerce	\$16
WEST Associates	\$2,854
Wisconsin Utility Association	\$6,883
2018 Total Trade Association Dues	\$596,240
2017 Total Trade Association Dues	\$662,428

Xcel Energy may contribute to organizations organized under 501(c)(4) of the Internal Revenue Code. To the extent that those contributions are not already included in the trade association list above, we make a good faith effort to identify and disclose any contributions of \$25,000 or more to such organizations that primarily engage in political activities. Due to the timing of accounting and tax issues, we are reporting contributions to 501(c)(4) organizations for 2018 in this report. In 2018, Xcel Energy contributed \$25,000 to Coloradans for Coloradans, a 501(c)(4) organization addressing a healthcare initiative on the ballot in 2018. We will report any 2019 contributions in next years' report.

Lobbying Activity and Expenditures

Xcel Energy has a responsibility to participate in the formation of sound public policies to protect the interests of the company, and our customers, shareholders and employees. We engage with policymakers and regulators at all levels on a wide range of matters, including economic development, tax policy, energy policy and more.

Disclosure requirements vary widely by jurisdiction. The table below uses publicly disclosed figures that follow the requirements or definitions of lobbying activity in a given jurisdiction (where applicable). Due to the differing standards between the states and at the federal level, some activities may be considered lobbying activities for disclosure purposes in one jurisdiction but not another.

Annual Minnesota disclosure filings are due to the Minnesota Campaign Finance and Public Disclosure Board in March. In order to align the Minnesota figures with the reporting period used for the rest of the jurisdictions, this disclosure includes an estimated figure for Minnesota legislative lobbying expenses in 2019. This figure will be finalized in the upcoming filing with the Minnesota Campaign Finance and Public Disclosure Board.

Lobbying Expenditures by Jurisdiction

Jurisdiction	2019	2018	Definitions Uses/Reporting Entity
Federal	\$1,790,000	\$1,680,000	Federal Lobbying Disclosure Act
Colorado	\$406,457	\$360,057	Colorado Secretary of State
Minnesota	\$475,282*	\$489,070	Minnesota Campaign Finance and Public Disclosure Board (Legislative Only)
New Mexico	\$35,101	\$25,099	New Mexico Lobbying Actuals
North Dakota	\$0	\$0	North Dakota Lobbying Actuals
South Dakota	\$0	\$0	South Dakota Lobbying Actuals
Texas	\$258,487	\$246,381	Texas Lobbying Actuals
Wisconsin	\$168,947	\$165,540	Wisconsin Ethics Commission
Total Expenditures	\$3,134,274	\$2,966,147	

**In order to provide 2019 data for this report, we are disclosing estimated legislative, non-regulatory expenses. The full report to the Minnesota Finance and Public Disclosure Board for 2019 is due later this spring. That report will include regulatory expenses in addition to the legislative expenses indicated here. More information, including filed reports, is available at www.cfb.mn.gov.*