

Political Contributions



Role of the Governance Compensation and Nominating Committee (GCN)

The GCN Committee 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.

2017 Campaign Contributions

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.

- 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 2017.
- No corporate funds were used to fund ballot initiative campaigns in 2017.

2017 Corporate Contributions to 527 Organizations

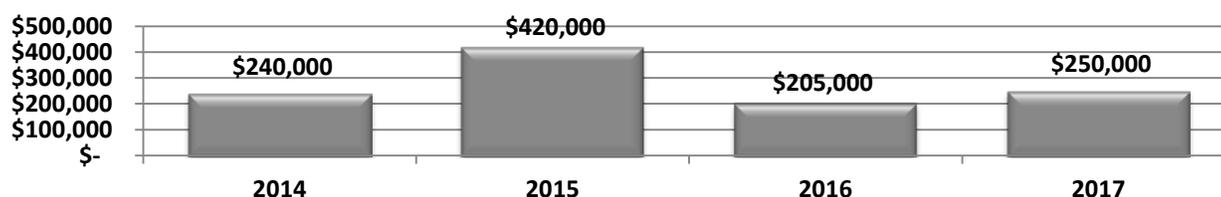
Xcel Energy may contribute to groups organized and operating under Section 527 of the Internal Revenue Code. Contributions to these groups can only be done through the approval process outlined in the Political Contributions Policy and are to be disclosed annually. The 2017 corporate contributions to such organizations are detailed below.

Recipient	Contribution
Democratic Governors Association	\$100,000
Democratic Legislative Campaign Committee	\$25,000
Republican Governors Association	\$100,000
Republican Legislative Campaign Committee	\$25,000
2017 Total Corporate Contributions	\$250,000

Key Takeaways

- Contributions to 527 groups and trade association lobbying are substantially similar to prior years.
- Increased lobbying expenditures reflect engagement on key issues for the company and our customers, including federal tax reform and administrative lobbying costs associated with our multi-year rate plan in Minnesota.
- New statements regarding independent expenditures, ballot measures, and other political activities have been added to this report to enhance transparency.

2014-2017 Contributions to 527 Organizations



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 previous year are not available until spring.

Xcel Energy's Trade Association Dues Subject to §162(e) (2016 data)

- American Benefits Council - \$6,600
- American Gas Association - \$23,744
- American Wind Energy Association - \$18,750
- Association of Electric Companies of Texas - \$75,555
- Colorado Association of Commerce and Industry - \$33,429
- Colorado Competitiveness Council - \$7,100
- Colorado Concern - \$1,100
- Denver Metro Chamber of Commerce - \$3,400
- Edison Electric Institute - \$259,710
- Greater North Dakota Chamber of Commerce - \$1,125
- Michigan Electric and Gas Association - \$13,829
- Minneapolis Regional Chamber of Commerce - \$3,500
- Minnesota Business Partnership - \$25,000
- Minnesota Center for Fiscal Excellence - \$1,280
- Minnesota Chamber of Commerce - \$27,500
- Minnesota Resource Recovery Association - \$3,341
- Minnesota Utility Investors \$93,100
- North American Electric Reliability Corporation - \$4,724
- Nuclear Energy Institute - \$37,581
- South Dakota Electric Utility Companies - \$34,315
- St. Paul Area Chamber of Commerce - \$9,000
- West Associates - \$2,854
- Wisconsin Utility Association - \$6,781
- **2016 Total Trade Association Dues – \$693,318**
- 2015 Total Trade Association Dues - \$675,151

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. In 2016, there were no such contributions.

Presidential Inaugural Committee

Xcel Energy contributed \$25,000 to the Presidential Inaugural Committee (PIC) for the 2017 presidential inauguration. This contribution is also reported by the PIC to the Federal Election Commission on the 90th day following the date of the presidential inaugural ceremony.

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. Increased lobbying expenditures in this year's report reflect the company's engagement on tax reform issues at the federal level as well as our work with Minnesota regulators on a landmark multi-year rate plan in 2016. Other major public policy issues in the last year included nuclear energy policy, renewable energy projects, cybersecurity, and transmission.

Disclosure requirements vary by jurisdiction. Where available, the table below uses publicly disclosed figures which follow the requirements or definitions of lobbying activity in the given jurisdiction.

Lobbying Expenditures

Federal	\$1,910,000	Federal Lobbying Disclosure Act				
Colorado	\$370,113	Colorado Secretary of State				
Minnesota*	\$2,131,459	Minnesota Campaign Finance and Public Disclosure Board				
	<table border="1"> <thead> <tr> <th>Legislative</th> <th>Regulatory**</th> </tr> </thead> <tbody> <tr> <td>\$507,787</td> <td>\$1,623,672</td> </tr> </tbody> </table>	Legislative	Regulatory**	\$507,787	\$1,623,672	
Legislative	Regulatory**					
\$507,787	\$1,623,672					
New Mexico	\$58,335	New Mexico Lobbying Actuals				
North Dakota	\$50,000	North Dakota Lobbying Actuals				
South Dakota	\$45,000	South Dakota Lobbying Actuals				
Texas	\$259,516	Texas Lobbying Actuals				
Wisconsin	\$167,742	Wisconsin Ethics Commission				
2017 Total Expenditures	\$4,992,165					

*Disclosing 2016 numbers, MN Campaign Finance and Public Disclosure Board discloses 2017 actuals in Spring 2018.

**Minnesota requires disclosure of costs related to regulatory work before the PUC, including outside counsel costs, support staff and items such as preparation of materials.

Total Lobbying Expenditures

