Direct Testimony and Schedules
Sangram S. Bhosale

Before the Minnesota Public Utilities Commission
State of Minnesota

In the Matter of the Application of Northern States Power Company
for Authority to Increase Rates for Gas Service in Minnesota

Docket No. G002/GR-23-413
Exhibit___(SSB-1)

Employee Expenses

November 1, 2023

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Schedules

I. INTRODUCTION

1   **I. INTRODUCTION**

3   Q.   PLEASE STATE YOUR NAME AND OCCUPATION.

4   A.   My name is Sangram S. Bhosale. I am employed by Xcel Energy Services Inc.

5   (XES), the service company subsidiary of Xcel Energy, as Vice President of

6   Supply Chain. XES is a wholly owned subsidiary of Xcel Energy Inc. (Xcel

7   Energy) and provides an array of support services to Northern States Power

8   Company (NSPM or the Company) and the other utility operating company

9   subsidiaries of Xcel Energy on a coordinated basis.

11   Q.   PLEASE SUMMARIZE YOUR QUALIFICATIONS AND EXPERIENCE.

12   A.   I have over 25 years of experience in procurement, supply chain management,

13   and operations, including various leadership and management consultant roles.

14   My experience includes successfully architecting and implementing enterprise-

15   wide transformation programs and leading procurement and supply chain

16   organizations. In addition, as a management consultant earlier in my career, I

17   have advised executives and led client engagements related to organizational

18   transformation, strategy development, procurement, supply chain management,

19   operational excellence, and asset optimization at global 500 companies. I joined

20   Xcel Energy in 2020 in my current role. As the Vice President of Supply Chain,

21   I am responsible for managing the supply chain functional areas including

22   Capital & Major Projects Procurement, Category Management, Governance &

23   Enablement, Transformation & Innovation, Procurement Operations, Material

24   Management, Nuclear Supply Chain Management, and Fleet. I also hold

25   responsibility for managing supply chain budgets. My resume is provided as

26   Exhibit___(SSB-1), Schedule 1.

1   Q.   WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

2   A.   I provide support for employee expenses requested for recovery in this rate case

3   as well as the Employee Expense Report (EER) Schedules filed by the Company

4   in compliance with Minnesota law and the commitments made in our prior

5   electric and gas rate cases. In the 2011 test year electric rate case (Docket No.

6   E002/GR-10-971),[1] the Company made several commitments to improve the

7   review, tracking, and documentation of employee expenses. My testimony, the

8   EER Schedules, and data we are providing in this gas rate case comply with the

9   commitments made in the 2011 test year electric rate case and subsequent

10   electric rate cases, Orders of the Minnesota Public Utilities Commission

11   (Commission), and Minnesota Statutes § 216B.16, subd. 17 (Employee Expense

12   Statute). These commitments are similarly applicable to the State of Minnesota

13   Gas Jurisdiction. The EER Schedules are provided in Volume 3, Required

14   Information, Section IV Other Required Information, Tab 2.

15

16   Additionally, my testimony provides support for the Supply Chain business

17   area's fleet capital investments for 2024. The budgeted capital investments for

18   fleet functions are $3.6 million in 2024 for the State of Minnesota Gas

19   Jurisdiction.

20

21   Q.   WHAT IS THE EMPLOYEE EXPENSE AMOUNT FOR THE 2024 TEST YEAR?

22   A.   The Employee Expense Amount for the 2024 test year is approximately $1.0

23   million for the State of Minnesota Gas Jurisdiction. This amount is based on

24   the Company's budgeting process, which is a forward-looking projection of

25   future projects, costs, and operating needs. Employee expenses are part of the

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[1] *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in the State of Minnesota,* Docket No. E002/GR-10-971.

1   overall O&M budgets of our various business areas and the Company does not

2   prepare a separate budget for employee expenses. The Employee Expense

3   Amount of $1.0 million is the combined amount of employee expenses included

4   in the 2024 business area budgets.

5

6   Q. DOES THE COMPANY PROPOSE AN ADJUSTMENT TO THIS AMOUNT?

7   A. Yes, as I discuss in more detail in Section IV, consistent with past electric and

8   gas rate cases, we propose an Employee Expense Adjustment of approximately

9       $0.2 million. As a result of subtracting this adjustment from the Employee

10   Expense Amount, we are requesting recovery for approximately $0.8 million for

11   employee expenses for the 2024 test year. The Employee Expense Adjustment

12   compensates for transactions that may be considered non-recoverable and is

13   representative of such transactions that could occur in 2024. Company witness

14   Benjamin C. Halama reflects this $0.2 million adjustment in his Direct

15   Testimony.

16

17 Q. IS THE METHODOLOGY TO DEVELOP THE 2024 TEST YEAR EMPLOYEE EXPENSE

18   AMOUNT AND EMPLOYEE EXPENSE ADJUSTMENT CONSISTENT WITH PAST

19   PRACTICE?

20 A. Yes. We have used the process of adjusting the Employee Expense Amount by

21   subtracting an Employee Expense Adjustment – which was largely developed

22   through work with the Office of the Minnesota Attorney General, Residential

23   Utilities Division (OAG) – in each of the Company's electric and gas rate cases

24   since 2010, with the exception of the Company's last natural gas rate case,

25   Docket No. G002/GR-21-678, and last electric rate case, Docket No.

26   E002/GR-21-630, where the methodology was adjusted due to the

27   unprecedented impacts of the COVID-19 pandemic. The Company's

1   methodology is also consistent with the Employee Expense Statute that became

2   effective in May 2010 and its requirement to compile EER Schedules based on

3   the most recently completed fiscal year.

4

5   Q.   HOW HAVE YOU ORGANIZED THE REMAINDER OF YOUR TESTIMONY?

6   A.   My testimony is organized in the following sections:

7   • Section II: *Definition and Governance of Employee Expenses.* Discusses the

8   definition of employee expenses; reporting requirements under the

9   Employee Expense Statute; the Company's Travel and Expense Policy

10   (Policy 10.2) (Employee Expense Policy); and commitments made in our

11   past rate cases.

12   • Section III: *Employee Expense Reporting.* Describes the Company's

13   employee expense reporting and provides details of SumTotal, other

14   systems, and internal controls.

15   • Section IV: *Employee Expense Amount, Employee Expense Adjustment, and*

16   *EER Schedules.* Explains the statutorily required EER Schedules, the

17   Employee Expense Amount based on business area budgets, and the

18   Employee Expense Adjustment that removes likely unrecoverable

19   expenses from the test year.

20   • Section V: *Employee Expense Review and Development of EER Schedules.*

21   Explains in detail how the actual 2022 employee expense transactions

22   were reviewed to remove items that are likely not recoverable, including

23   key word search and identification of vague business purposes,

24   transactions inconsistent with the Employee Expense Policy, and

25   transactions not generally needed for the provision of utility service.

26   • Section VI: *Organizational Dues – Corporate Dues and Chamber of Commerce*

27   *Dues.* Explains how the Company continues to provide information

1 about Organizational Dues, in compliance with the Commission's Order

2 in the Company's most recent electric rate case.

3 • Section VII: *Fleet Capital Investments.* Supports the Company's budget for

4 fleet capital investments under Supply Chain's Fleet organization.

5 • Section VIII: *Compliance Item on Lobbying Compensation.* Describes the

6 Company's compensation for employees engaged in lobbying and

7 explains the costs included and excluded in the rate request.

8 • Section IX: *Conclusion.*

9

10 **II. DEFINITION AND GOVERNANCE OF EMPLOYEE EXPENSES**

11

12 Q. HOW DOES THE COMPANY DEFINE EMPLOYEE EXPENSES?

13 A. Employee expenses are those operation and maintenance (O&M) expenditures

14 that are:

15   (1) tracked in our employee expense reporting system;

16   (2) subject to the guidelines in the Company's Employee Expense Policy;

17   and

18   (3) consistent with the categories set forth in the Employee Expense Statute.

19

20 Examples of employee expenses are airfare, hotel stays, car rental, mileage on

21 personal vehicles used for work purposes, parking, meals for business purposes,

22 and recognition for the work performed by Company employees to provide safe

23 and reliable service to customers.

24

25 Q. OVERALL, ARE THE COMPANY'S EMPLOYEE EXPENSES NEEDED FOR THE

26   PROVISION OF UTILITY SERVICE?

1   A.   Yes. At times, Company business requires that our employees work at locations

2   other than their offices or primary work locations, attend training, or meet with

3   our customers and stakeholders. For example, employees incur expenses when

4   they work in the field to ensure the reliability of the Company's facilities and

5   equipment, manage workers across our eight-state service territory, or travel to

6   attend conferences or training to maintain their knowledge base. For these types

7   of activities, Company employees incur expenses as guided by the Employee

8   Expense Policy.

9

10   Q.   WHAT ARE THE STATUTORY REPORTING REQUIREMENTS REGARDING

11   EMPLOYEE EXPENSES?

12   A.   The Employee Expense Statute establishes the primary regulatory reporting

13   requirements for employee expenses. The statute requires the Company to

14   provide, when filing a general rate case, schedules separately itemizing:

15   (1) travel and lodging expenses;

16   (2) food and beverage expenses;

17   (3) recreational and entertainment expenses;

18   (4) expenses (and compensation) for board of directors;

19   (5) expenses (and compensation) for the ten highest paid officers and

20   employees;

21   (6) dues and expenses for memberships in organizations or clubs;

22   (7) gift expenses;

23   (8) expenses related to owned, leased, or chartered aircraft; and

24   (9) lobbying expenses.

25

26   For items (1) and (2), the Company is required to separately provide data for

27   employees who are at the vice president-level and above. Employee expense

1		transaction data must be from the most recently completed fiscal year and
2		include the date, amount, business purpose, and vendor for the expense.
3		
4	Q.	PLEASE DESCRIBE THE COMPANY'S EMPLOYEE EXPENSE POLICY.
5	A.	The Employee Expense Policy provides the guidelines applicable to all non-
6		bargaining-unit and bargaining-unit employees who incur travel or other
7		business-related expenses. The current version of the Employee Expense
8		Policy is provided in Exhibit___(SSB-1), Schedule 2. Since the filing of the most
9		recent gas rate case on November 1, 2021, we have amended the Employee
10		Expense Policy in June 2022 and December 2022. The main revisions in June
11		2022 included increasing the daily spending limit from $65 to $75 per day for
12		meal expenses, updating the international travel section, and clarifying that
13		operational/informational technology should not be purchased using the
14		corporate credit card. The December 2022 revisions updated language for
15		consistency without material changes. A summary of these changes is provided
16		in Exhibit ___(SSB-1), Schedule 3.
17		
18	Q.	SINCE THE ENACTMENT OF THE EMPLOYEE EXPENSE STATUTE, HAS THE
19		COMPANY MADE ANY COMMITMENTS IN PAST RATE CASES REGARDING THE
20		REPORTING OF EMPLOYEE EXPENSES THAT IMPACT THIS NATURAL GAS RATE
21		CASE?
22	A.	Yes. During our 2011 test year electric rate case (Docket No. E002/GR-10-
23		971), we made several commitments to provide more detailed information in
24		Direct Testimony and to improve the quality of employee expense data to
25		facilitate review of employee expenses in our future rate cases. These
26		commitments are summarized in Exhibit___(SSB-1), Schedule 4. Also, in
27		preparing for the 2013 test year electric rate case (Docket No. E002/GR-12-

1   961), we made additional commitments in a meeting with the OAG, which are

2   also included in Schedule 4.

3

4 Q. IN PAST RATE CASES, HAS THE COMMISSION PLACED ANY REQUIREMENTS ON

5   THE COMPANY FOR REPORTING EMPLOYEE EXPENSES IN FUTURE RATE CASES?

6 A. Yes, in various rate cases, including the Company's most recent electric rate

7   case, the Commission has placed certain requirements on the Company that are

8   applicable to requests for cost recovery of employee expenses. The

9   Commission's Orders in the 2013 and 2014 test year electric rate cases required

10   that if the Company seeks recovery for corporate aviation costs in future rate

11   cases, the Company should provide more information, but did not otherwise

12   add any new requirements for employee expenses. These requirements are

13   summarized in Schedule 4.

14

15 Q. IS THE COMPANY SEEKING RECOVERY FOR CORPORATE AVIATION EXPENSES IN

16   THIS CASE?

17 A. No. The Company is not requesting recovery of any corporate aviation

18   expenses in this rate case, and therefore we have not provided any flight log,

19   passenger, or business purpose information. To ensure completeness, we are

20   providing expenses related to corporate aviation in EER Schedule 8, consistent

21   with the Employee Expense Statute. Our 2024 budgeted corporate aviation

22   costs for the State of Minnesota Gas Jurisdiction are approximately $0.3 million.

23   To exclude these amounts from this case, we have made an adjustment of

24   approximately $0.3 million for the 2024 test year. This is reflected in Company

25   witness Halama's Direct Testimony.

26

1 Q. WHAT DID THE COMMISSION'S ORDER IN THE MOST RECENT ELECTRIC RATE

2   CASE (DOCKET NO. E002/GR-21-630) REQUIRE RELATED TO THE EMPLOYEE

3   EXPENSE STATUTE?

4 A. The Commission, at Order Point 41 of its July 17, 2023, FINDINGS OF FACT,

5   CONCLUSIONS, AND ORDER, ordered that the Company "must continue

6   providing information mandated by Minn. Stat. § 216B.16, subd. 17, for all costs

7   of dues it seeks to recover regardless of the type of membership (individual,

8   corporate, or chamber)." Individual dues are those dues that employees

9   individually pay for as part of their employment and have typically been part of

10   the Company's request for recovery of employee expenses. On the other hand,

11   corporate dues are dues the Company pays to organizations where the Company

12   itself is a member. Chamber of Commerce dues are dues the Company pays to

13   various chambers where it is a member, and are accordingly a subset of

14   corporate dues. Individual dues are reflected in EER Schedule 6, as has been

15   the Company's practice in past rate cases and are discussed in Section IV. We

16   address corporate dues and Chamber of Commerce dues in more detail in

17   Section VI, and the Company's actual 2022 corporate and Chamber of

18   Commerce dues are itemized in Volume 4, Workpapers, VIII A2 and VIII A4.

19   We refer to these kinds of Company dues as Organizational Dues.

20

21 Q. HAS THE COMPANY FULFILLED ALL ITS COMMITMENTS AND COMMISSION

22   REQUIREMENTS IN DEVELOPING THE EER SCHEDULES AND THE EMPLOYEE

23   EXPENSE AMOUNT AND ADJUSTMENT?

24 A. Yes. My Direct Testimony, the EER Schedules, the Workpapers, and the

25   actions the Company has taken and continues to take demonstrate our

26   fulfillment of the commitments and requirements established in the prior

27   electric rate cases. Schedule 4 identifies where each commitment or requirement

1		is addressed in this case. Our employee expense compliance and methodology
2		to develop the Employee Expense Amount and Adjustment have evolved for
3		many years in collaboration with the OAG, are compliant with the Employee
4		Expense Statute, and have resulted in just and reasonable outcomes in past cases
5		and will also do so in this case.
6		
7		**III. EMPLOYEE EXPENSE REPORTING**
8		
9	Q.	HOW DOES THE COMPANY TRACK EMPLOYEE EXPENSE TRANSACTIONS?
10	A.	Our main tool to document and manage employee expense transactions is
11		SumTotal. We have used this intranet application system since October 2012.
12		Some employee expenses are also reported through the Company's SAP and
13		TIME applications. These separate applications are described in more detail
14		below.
15		
16		**A. SumTotal**
17	Q.	WHAT KIND OF EMPLOYEE EXPENSES ARE REPORTED THROUGH SUMTOTAL?
18	A.	All bargaining-unit and non-bargaining-unit employees are required to use
19		SumTotal to report and account for expenses that are charged to the Company
20		credit card. This is the required payment method for all expenses that can be
21		paid with a credit card. In addition, non-bargaining-unit employees report
22		through SumTotal cash-out-of-pocket expenses that cannot be charged to the
23		Company credit card. Typically, such expenses may include parking, personal
24		car mileage, taxi/bus/other transportation, and tips/tolls.
25		
26	Q.	HOW DOES SUMTOTAL FACILITATE APPROPRIATE EMPLOYEE REPORTING AND
27		MANAGER APPROVAL OF EMPLOYEE EXPENSES?

1   A. SumTotal requires detailed information from the employee for all appropriate

2   fields to finish an expense report. The system notifies the user of potential

3   inconsistencies with the Employee Expense Policy and prompts the user for

4   missing information. In addition, an electronic copy of all required receipts must

5   be included with the expense report for manager review and approval. All

6   expense reports require approval from at least one next-level manager, who is

7   responsible for reviewing to ensure that all transactions are appropriate and

8   include adequate documentation, correct cost type and accounting, and itemized

9   receipts. Additionally, if information provided in SumTotal is not in compliance

10   with the Company guidelines, the transaction is flagged for further review by a

11   group within Supply Chain with oversight authority.

12

13   In addition, all Company credit card holders are required to reconcile credit card

14   transactions each month using SumTotal. All transactions are monitored to

15   ensure they are reconciled and approved. If expenses are not reported through

16   SumTotal within 60 days, the credit card is suspended until reporting is

17   completed.

18

19   Q. DOES THE USE OF SUMTOTAL ALLOW THE COMPANY TO COMPLY WITH THE

20   REPORTING REQUIREMENTS IN THE EMPLOYEE EXPENSE STATUTE?

21   A. Yes. SumTotal includes all data fields necessary to comply with the Employee

22   Expense Statute reporting requirements. The transaction date, expense type,

23   expense category, business purpose, line comment, transaction amount, and

24   vendor name fields are populated for data review and analysis.

25

1   Q.   PLEASE DESCRIBE THE TOOLS AND SERVICES THAT ARE AVAILABLE TO
2   EMPLOYEES FOR TRAVEL-RELATED NEEDS.

3   A.   The Company contracts with a designated travel agency, Executive Travel Inc.
4   (ETI). ETI provides tools and capabilities for our employees' business travel
5   needs, including an online self-service booking tool called Concur Travel
6   (Concur), a mobile phone app version of Concur, and enhanced reporting tools
7   to monitor employee travel. Employees must use ETI for all travel
8   arrangements (commercial airfare, rental cars, and hotel reservations) and are
9   expected to use Concur to book domestic travel reservations. Employees are
10   required to use preferred providers identified by Concur as well, so that the
11   lowest cost option is selected whenever possible.

12

13 Q.   WHAT TRAINING ON EMPLOYEE EXPENSE REPORTING IS AVAILABLE FOR
14   COMPANY EMPLOYEES?

15 A.   We provide employee training for employee expense reporting through our
16   online Learning Management System (LMS) and via regular virtual live training
17   sessions. All employees are required to complete the *Travel and Expense Policy:*
18   *Appropriate Use of Your Corporate Credit Card* training prior to applying for a
19   Company credit card (attached as Exhibit___(SSB-1), Schedule 5A). We also
20   provide optional *Create and Submit an Expense Report* and *Approving an Expense*
21   *Report* training courses offered regularly via virtual live training. In addition,
22   every SumTotal user is encouraged to take a periodic refresher training on these
23   courses.

24

25 Q.   DOES THE COMPANY PROVIDE OTHER RESOURCES FOR SUMTOTAL USERS?

26 A.   Yes. We maintain an internal website for travel and employee expenses, which
27   is a one-stop place for employees to find more information on travel, Company

1   credit cards, expense reporting requirements and SumTotal. It contains, among

2   other things, links to frequently asked questions, forms, job aid manuals, and

3   reference documents. For example, we have published for employees and their

4   managers detailed job aid manuals *Creating and Submitting Expense Reports*

5   (attached as Exhibit___(SSB-1), Schedule 5B) and *Approving an Expense Report*

6   (attached as Exhibit___(SSB-1), Schedule 5C). We have also attached

7   screenshots from the main sections of our Travel and Expense website as

8   Exhibit___(SSB-1), Schedule 5D.

9

10   Additionally, we use General Notifications, delivered via Outlook email and

11   SumTotal Inbox, to notify all SumTotal users about potential system

12   functionality changes, policy updates, and useful tips.

13

14   Q.   WHAT IS THE GOAL OF EMPLOYEE EXPENSE TRAINING AND INFORMATIONAL

15   MATERIALS?

16   A.   The goal is that our employees understand the Company's Employee Expense

17   Policy and can accurately report their business-related expenses with

18   appropriate documentation. Overall, the training and educational materials are

19   designed to teach employees how to use SumTotal's functionality to enter

20   information into expense reports more efficiently and in conformity with the

21   Employee Expense Policy. These materials also educate expense report

22   approvers of the tools available within SumTotal to facilitate their review and

23   approval.

24

25   Q.   WHAT ADDITIONAL TOOLS AND HELP ARE AVAILABLE FOR EMPLOYEES WHO

26   ARE PREPARING AN EXPENSE REPORT IN SUMTOTAL?

1   A.   There is additional help available if employees have questions or problems when
2   they are preparing an expense report in SumTotal. They can contact the Travel
3   and Expense Reporting team via submission of a Get Assistance Ticket or by
4   calling the Supply Chain hotline. Hotline specialists who answer the phones and
5   Get Assistance ticket specialists can view the expense report that is being
6   prepared and give step-by-step directions on how to finish it correctly.
7   Employees can also use SumTotal's help tool Job Aid. When an employee is
8   preparing an expense report, she or he can point to the Job Aid in SumTotal,
9   which then gives additional information on the specific field.

10

11   Q.   DOES SUMTOTAL ALSO INCLUDE TRANSACTIONS THAT ARE NOT CONSIDERED
12   EMPLOYEE EXPENSES?
13   A.   Yes. Employees are directed to use the Company credit card for minor material
14   and service purchases, which are not considered employee expenses. In the
15   normal course of business, these types of items include office supplies, tools,
16   printing services, subscriptions to magazines and information services, and
17   office furniture. Although these credit card transactions are reconciled through
18   SumTotal, they are typical cost-of-doing business expenses not covered by the
19   Employee Expense Statute or the Employee Expense Policy.

20

21   **B.**   **Other Systems**
22   Q.   WHAT OTHER COMPANY SYSTEMS WERE USED IN 2022 TO REPORT EMPLOYEE
23   EXPENSES?
24   A.   Some 2022 employee expense transactions can also be found in the Company's
25   SAP and TIME applications. These are enterprise-wide systems that perform
26   multiple functions for our business areas, including processing some non-labor,
27   employee expenses.

1

2   Q.   PLEASE DESCRIBE SAP.

3   A.   SAP is a business software package that can integrate all areas of business for

4   financials, manufacturing, logistics, distribution, and so on. The Company uses

5   the SAP software suite for the Company's general ledger as well as work and

6   asset management. SAP applications are used primarily for purchasing,

7   contracts, inventory, accounts payable, and design work management. SAP is

8   also the Company's master vendor management reporting system, containing

9   the Vendor Invoice Management (VIM) application. The VIM application

10   includes some employee expense transactions. In total, approximately 400 State

11   of Minnesota Gas Jurisdiction employee expense-related transactions were

12   reported through SAP's VIM application in 2022.

13

14   Q.   PLEASE DESCRIBE TIME.

15   A.   TIME is the Company's mainframe application used to record time entries for

16   all employees (both those in bargaining units and those not in bargaining units)

17   through 2022. TIME was also used to record 2022 costs other than wages

18   incurred by the Company's bargaining-unit employees across all business areas

19   (TIME Expenses). The 2022 TIME Expenses entries for the State of

20   Minnesota Gas Jurisdiction consisted of meal allowances (68 percent), site

21   allowance (13 percent), special responder fees and location pay (4 percent), per

22   diems (11 percent), and mileage (4 percent). These expenses are processed

23   within the TIME system so that they are properly reported to the Internal

24   Revenue Service and included in the appropriate employees' annual W2

25   statements.

26

1   Q.   HOW DO THE TIME EXPENSES RELATE TO THE EMPLOYEE EXPENSE
2   AMOUNT?
3   A.   Under applicable collective bargaining agreements, we are required to reimburse
4   bargaining-unit employees for certain expenses those employees incur. The
5   TIME Expenses – for per diems, meal allowances, safety shoes, and so on – are
6   for those reimbursements. Because these entries reflect cash payments to
7   bargaining-unit employees made pursuant to collective bargaining agreements,
8   they are somewhat different in nature from the kinds of expenses contemplated
9   in the Company's Employee Expense Policy or the Employee Expense Statute
10   and defined earlier in my testimony. Nevertheless, they are included in the
11   Employee Expense Amount because they are coded as employee expenses in
12   our general ledger system and are recoverable O&M expenses. This is consistent
13   with the Company's approach in its last several electric rate cases, and most
14   recent natural gas rate case.
15
16 Q.   DID THE COMPANY'S EMPLOYEE EXPENSE REVIEW AND PREPARATION OF EER
17   SCHEDULES ALSO INCLUDE A REVIEW OF 2022 VIM AND TIME TRANSACTIONS?
18 A.   Yes. We conducted a thorough review of 2022 VIM and TIME data to remove
19   expenses that were considered non-recoverable. Summary data from these
20   systems for 2022 are reported separately in EER Schedules 10 and 11.
21
22   **C.   Internal Controls and Monitoring**
23 Q.   HOW IS THE COMPANY MONITORING COMPLIANCE WITH THE EMPLOYEE
24   EXPENSE POLICY AND APPROPRIATE REPORTING OF EMPLOYEE EXPENSES?
25 A.   We have established several ways to monitor and track appropriate reporting of
26   employee expenses: 1) SumTotal Controls; 2) Compliance and Trend
27   Reporting; and 3) Internal Audits. I will discuss each of these briefly below.

1

2   Q.   DOES SUMTOTAL HAVE SYSTEM-BUILT CONTROLS TO FLAG POTENTIALLY NON-

3   COMPLIANT EXPENSE REPORTS?

4   A.   Yes. SumTotal advises the approving supervisor and a group within Supply

5   Chain when an expense report may not comply with the Employee Expense

6   Policy. Additionally, SumTotal randomly flags a percentage of the daily

7   manager-approved expense reports for audit review by the group within Supply

8   Chain with oversight authority. A Supply Chain Administrator will review each

9   flagged expense report and if appropriate, reject it so that it can be corrected to

10   be in compliance with the Company policy and guidelines. Expense reports

11   resubmitted by employees to correct a noncompliant entry may be routed back

12   to the Supply Chain oversight group to ensure the requested correction(s) have

13   been made to the expense item(s). A second layer of verification is added by

14   monthly check and balance reviews, which monitor whether the Supply Chain

15   Administrators are accurately rejecting or releasing flagged expense reports.

16

17   Q.   PLEASE DESCRIBE THE COMPLIANCE AND TREND REPORTING.

18   A.   The Supply Chain organization has developed separate compliance and trend

19   reporting components and expense report auditing for the Company's

20   Employee Expense Policy. The purpose of the compliance reporting and

21   expense report auditing is to collect monthly statistics and provide more detailed

22   analysis of SumTotal data, such as unclear business purposes or untimely

23   completion of expense reports. Compliance reporting allows us to identify

24   reoccurring problem areas, which may indicate that there is a need to provide

25   more direction and education to our employees. This information also helps us

26   to modify and improve our training materials.

27

1   Trend reporting was established to collect and analyze SumTotal data to identify

2   patterns or issues that would merit changes in the Company's Employee

3   Expense Policy. For example, trend reporting may show that there is a need to

4   add a new expense category or change spending limits for an existing expense

5   category. In addition, we monitor overall spending for certain expenses, for

6   example, meals and hotel fees. Business Units can contact the Travel and

7   Expense Reporting team to obtain credit card spending data for their respective

8   employees, to gain greater visibility to monitor and control credit card use.

9

10   Q.   WHAT DOES THE COMPANY DO AFTER IT IDENTIFIES A NON-COMPLIANCE

11   TREND?

12   A.   We take the opportunity to better educate our employees, typically in two ways.

13   First, and most often, Supply Chain sends informational emails to all employee

14   expense system users. These informational emails offer very specific

15   instructions on how to correct or clarify issues that were identified as a non-

16   compliance trend. Second, Supply Chain may perform supplemental in-person

17   or virtual group training at the request of a Business Unit manager.

18

19   Q.   PLEASE DESCRIBE HOW THE COMPANY HAS USED INTERNAL AUDITS TO

20   MONITOR COMPLIANCE WITH THE EMPLOYEE EXPENSE POLICY AND

21   APPROPRIATE REPORTING OF EMPLOYEE EXPENSES.

22   A.   The most recent Company internal audit relating to the Employee Expense

23   Policy was conducted in 2021 and the Audit Report was issued on October 27,

24   2021.[2] The main objectives for the 2021 audit were to: 1) determine the accuracy

25   of cost allocations and assignments in SumTotal transactions; 2) evaluate the

---

[2] This audit also examined some other Company policies related to the purchase of information technology and operational technology, which are not governed by the Employee Expenses Policy.

1		control structure for the new corporate credit card; 3) assess any fraudulent
2		spending; and 4) develop potential automation for the manual key word search
3		to identify employee expenses that may not be appropriate for rate recovery.
4		
5	Q.	WHAT DID THE AUDIT CONCLUDE AS TO EMPLOYEE EXPENSE COMPLIANCE?
6	A.	In general, the audit found that the SumTotal system and the operational
7		controls in place are functioning well. The audit examined a sample of 2018-
8		2020 transactions and concluded that the transactions had been assigned to
9		appropriate accounts. The audit also assessed the operational control structure
10		for the corporate credit card and found that the controls were adequate and
11		functional. Additionally, Audit Services analyzed transaction data to detect any
12		fraudulent patterns or transactions. No cases of fraud were found.
13		

IV. EMPLOYEE EXPENSE AMOUNT, EMPLOYEE EXPENSE ADJUSTMENT, AND EER SCHEDULES

16		
17	Q.	WHAT IS THE EMPLOYEE EXPENSE AMOUNT FOR THE 2024 TEST YEAR?
18	A.	The Employee Expense Amount for the 2024 test year is approximately $1.0
19		million for the State of Minnesota Gas Jurisdiction. The Company does not
20		prepare a separate budget for employee expenses, but rather derives the
21		Employee Expense Amount from the O&M budgets of its various business
22		areas.
23		
24	Q.	HOW ARE THE BUSINESS AREA BUDGETS PREPARED?
25	A.	The Company's budgeting process is a forward-looking projection of projects,
26		costs, and operational needs. Each business area develops its own budget as
27		part of the Company's overall budgeting process, which is described in more
28		detail in the Direct Testimony of Company witness Christopher R. Haworth. In

1		general, business area budgets are organized using "cost elements," and certain
2		accounts include planned expenditures for the types of expenses that are listed
3		in the Employee Expense Statute. The sum of the amounts budgeted for these
4		accounts constitutes the Employee Expense Amount for the test year period.
5		
6	Q.	DOES THE COMPANY PROPOSE TO RECOVER THE ENTIRE EMPLOYEE EXPENSE
7		AMOUNT IN RATES?
8	A.	No, as mentioned above, the Company adjusts the Employee Expense Amount
9		by subtracting the Employee Expense Adjustment. The remaining amount is
10		what the Company proposes to recover in rates.
11		
12	Q.	WHAT IS THE EMPLOYEE EXPENSE ADJUSTMENT?
13	A.	The Employee Expense Adjustment for the 2024 test year was developed by
14		reviewing the actual employee expense transactions for the most recent full
15		fiscal year, which in this case is 2022. In this review, we identified transactions
16		that are not generally needed for providing utility service and are likely non-
17		recoverable based on our experience in prior rate cases, such as transactions
18		that are inconsistent with our Employee Expense Policy guidelines, related to
19		entertainment or life event celebrations, or have vague business purposes. The
20		amount that is included in the Employee Expense Adjustment is representative
21		of such transactions that could occur in the 2024 test year and is therefore
22		subtracted from the Employee Expense Amount.
23		
24		In most of the Company's rate cases since this methodology was developed, the
25		Employee Expense Adjustment Amount has been the dollar amount of likely
26		unrecoverable expenses from the most recent full fiscal year. For example, to
27		identify the Employee Expense Amount for the 2016 test year electric rate case

1   (Docket No. E002/GR-15-826), we reviewed the 2014 actual employee

2   expenses, determined the amount, in dollars, of those 2014 actual expenses that

3   was likely unrecoverable, and used that dollar amount as the Employee Expense

4   Adjustment to adjust the Employee Expense Amount projected for the 2016

5   test year.

6

7 Q. PLEASE DESCRIBE THE METHOD THE COMPANY USED IN ITS MOST RECENT

8   MINNESOTA GAS RATE CASE FOR CALCULATING THE EMPLOYEE EXPENSE

9   ADJUSTMENT FOR THE 2022 TEST YEAR.

10 A. In our most recent Minnesota gas rate case (Docket No. G002/GR-21-678),

11   the 2022 test year adjustment factor was based on the *percentage* of likely

12   unrecoverable employee expenses from 2020, rather than the *dollar amount* of

13   those 2020 unrecoverable expenses.   Because employee expenses were

14   significantly lower in 2020 compared to previous years due to the COVID-19

15   pandemic, we developed a different method to calculate the 2022 test year

16   Employee Expense Adjustment for that rate case. The 2020 adjustment

17   percentage was calculated by dividing the 2020 adjustment amount by the actual

18   2020 State of Minnesota Gas Retail jurisdictional amount of Employee

19   Expenses. The result of this calculation was an adjustment percentage of -13.7

20   percent for 2020. The adjustment factor of -13.7 percent was multiplied against

21   the 2022 budgeted Employee Expense Amount of approximately $1.3 million.

22   The resulting Employee Expense Adjustment for the 2022 test year was

23   approximately $0.2 million.

24

25 Q. DOES THE COMPANY PROPOSE TO USE THIS METHOD OF CALCULATING THE

26   EMPLOYEE EXPENSE ADJUSTMENT IN THIS CURRENT 2024 TEST YEAR RATE

27   CASE?

1   A.   No. While we considered the method of calculating the employee expense
2   adjustment to be reasonable for our previous rate case, we considered the
3   method of calculating the 2022 test year Employee Expense Adjustment, based
4   on the historical 2020 adjustment percentage, to be only a provisional solution.
5   It was developed and adopted out of necessity because of the significantly
6   reduced level of employee expenses incurred in 2020 as a result of the COVID-
7   19 pandemic. The Company experienced much lower employee expenses in
8   2020-2021 than in past periods because of the COVID-19 pandemic and related
9   peace-time emergency government orders. As explained above, airfare, lodging,
10   other travel-related expenses, and meals have historically made up a significant
11   portion of the Company's employee expenses. In response to the COVID-19
12   pandemic, governmental authorities in many jurisdictions across the U.S.
13   imposed restrictions such as barring non-essential travel, closing restaurants,
14   and limiting gatherings such as conferences. As a result of these restrictions,
15   our employees traveled much less and incurred far fewer business meals at
16   restaurants. Because the travel restrictions and other disruptions caused by the
17   COVID-19 pandemic are no longer occurring, we have returned to the
18   methodology used in previous electric rate cases.
19
20   Q.   IN ORDER TO DETERMINE THE EMPLOYEE EXPENSE ADJUSTMENT IN THIS RATE
21   CASE, DID THE COMPANY REVIEW ITS 2022 EMPLOYEE EXPENSE TRANSACTIONS
22   TO PREPARE EER SCHEDULES AND TO IDENTIFY TRANSACTIONS THAT ARE
23   NON-RECOVERABLE?
24   A.   Yes. The Employee Expense Statute requires us to compile EER Schedules
25   based on the most recently completed fiscal year. We reviewed our 2022
26   employee expenses, and we have provided all required 2022 EER Schedules in
27   this 2024 test year rate case filing. We also reviewed the 2022 employee expense

1   transactions to identify transactions that are not generally needed for providing
2   utility service and that are likely non-recoverable. This amount was used for
3   determining the Employee Expense Adjustment for the 2024 test year.

4

5   Q.   WHAT IS THE AMOUNT OF EMPLOYEE EXPENSES THE COMPANY IS REQUESTING
6   TO RECOVER FOR THE 2024 TEST YEAR?

7   A.   After the Company's proposed Employee Expense Adjustment (approximately
8          $0.2 million) is subtracted from the budgeted Employee Expense Amount
9   (approximately $1.0 million), we are requesting recovery of approximately $0.8
10   million for employee expenses for the State of Minnesota Gas Jurisdiction for
11   the 2024 test year, as shown in Table 1, below.

12

Table 1
**Employee Expense Amount, Employee Expense Adjustment,
and Requested Recovery for 2024
(State of Minnesota Gas Jurisdiction)**

Year	Employee Expense Amount ($ 000s)	Employee Expense Adjustment ($ 000s)	Request for Recovery ($ 000s)
2024	1,010	(248)	762

20   Q.   PLEASE PROVIDE DATA ON THE BUDGETED EMPLOYEE EXPENSE AMOUNTS AND
21   THE ACTUAL EMPLOYEE EXPENSES FOR THE PAST THREE YEARS.

22   A.   The table below provides data on the employee expense amounts (based on
23   business area budgets) and respective actual employee expenses for the past
24   several years for the State of Minnesota Gas Jurisdiction. Employee expenses
25   can be somewhat volatile because of external conditions outside of the
26   Company's control, such as weather and variations in airfare and hotel prices,
27   and also may fluctuate based on unforeseen Company needs and commitments,

1   such as mutual aid requirements to assist other utilities in national emergencies.

2   As a particular extreme example, the 2020 and 2021 employee expenses were

3   significantly affected by the travel restrictions imposed during the COVID-19

4   pandemic, which resulted in the large variances depicted in Table 2, below. The

5   2022 actual employee expenditures more closely reflect the Company's current

6   expectations regarding post-pandemic expenditure levels for employee

7   expenses.

8

9   Exhibit___(SSB-1), Schedule 6 provides additional data by employee expense

10   category.

11

12   **Table 2**

13   **Employee Expense Amount vs. Actual Employee Expenses,**
                2020-2022 (State of Minnesota Gas Jurisdiction)

14

Year	**Budgeted [1] Employee Expense Amount ($ 000s)**	**Actual Employee Expense Amount ($ 000s)**	**Variance Over/(Under) ($ 000s)**	**Variance Over/(Under) %**
2020	1,403	749	(654)	-46.6%
2021	1,148	717	(431)	-37.6%
2022	1,323	1,113	(210)	-15.9%

[1] Amounts are unadjusted (i.e., without any employee expense adjustment).

1   **V. EMPLOYEE EXPENSE REVIEW AND DEVELOPMENT OF EER**
2   **SCHEDULES**
3

4   **A.   Employee Expense Review Process**

5   Q. PLEASE DESCRIBE THE EER SCHEDULES.

6   A. The Employee Expense Statute requires that a rate case filed by a public utility

7   must include a schedule that separately itemizes certain employee expense

8   categories. This employee expense transaction data must be from the most

9   recently completed fiscal year and include the date, amount, business purpose,

10   and vendor for the expense. After we reviewed all actual 2022 employee expense

11   data and removed items that we believed were not recoverable, the remaining

12   transactions were arranged into EER Schedules required by the Employee

13   Expense Statute. A list of the EER Schedules is attached as Exhibit___(SSB-1),

14   Schedule 7. The complete EER Schedules are provided in Volume 3 Required

15   Information, Section IV Other Required Information, Tab 2.

16

17 Q. IN GENERAL, HOW DID THE COMPANY REVIEW EMPLOYEE EXPENSES AND

18   DEVELOP THE EER SCHEDULES?

19 A. We followed the same methodology as was used in our previous five pre-

20   pandemic electric rate cases: 2013 test year (Docket No. E002/GR-12-961),

21   2014 test year (Docket No. E002/GR-13-868), 2016 test year (Docket No.

22   E002/GR-15-826), 2020 test year (Docket No. E002/GR-19-564), and 2021

23   test year (Docket No. E002/GR-20-723), and as was used in our most recent

24   gas rate case (Docket No. G002/GR-21-678). This methodology is just as

25   applicable for the State of Minnesota Gas Jurisdiction as it is for the Minnesota

26   electric jurisdiction.

27

1   Q. WHAT DATA DID THE COMPANY REVIEW AND USE TO PREPARE THE EER

2   SCHEDULES?

3   A. The Employee Expense Statute requires that we provide employee expense data

4   from our last completed fiscal year, which for this case is 2022. We used the full

5   12 months of 2022 data from SumTotal and any other applicable Company

6   systems (e.g., VIM and TIME).

7

8   Q. WHAT FIELDS DID THE COMPANY EXTRACT FROM SUMTOTAL?

9   A. While SumTotal contains many fields, for this case we extracted fields that were:

10   (1) necessary to develop EER schedules that comply with our interpretation of

11   the requirements in the Employee Expense Statute and our commitments in the

12   prior electric rate cases; and (2) helpful in determining if the expense could be

13   allocated to the State of Minnesota Gas Jurisdiction. The raw SumTotal data

14   set includes the corporate credit card transactions and cash reimbursements for

15   all expenses incurred by NSPM and Service Company employees.

16

17   Q. PLEASE DESCRIBE THE PROCESS FOR REVIEWING 2022 SUMTOTAL DATA?

18   A. The process to review SumTotal data is largely manual and involves numerous

19   steps and a line-by-line review of transactions. A detailed explanation of this

20   process is provided in Exhibit___(SSB-1), Schedule 8. After extracting the data

21   set described above, we first removed transactions that have no cost assignment

22   or allocation to the State of Minnesota Gas Jurisdiction (restricting the 2022

23   data set to approximately 78,000-line items) with one noted exception: we

24   preserved all transaction data for non-unrecoverable below-the-line dues even

25   if not allocable to the State of Minnesota Gas Jurisdiction. We did so to remain

26   consistent with the EER Schedules provided in our previous electric rate cases,

27   which included below-the-line dues expense transaction data. We have

1   developed a process that allows us to determine the amount of each

2   transaction's jurisdictional allocation.

3

4   From this point, we identified transactions that are not recoverable and are

5   already accounted for below-the-line or needed to be manually moved below-

6   the-line. Several Company cost element accounts are below-the-line accounts

7   and include expenses related to lobbying, non-recoverable recognition,

8   corporate tickets, and other similar deductions. These non-recoverable, below-

9   the-line transactions were excluded from a further review.

10

11   Q.   WHAT WAS THE NEXT STEP IN THE SUMTOTAL REVIEW PROCESS?

12   A.   Next, we searched the remaining transactions (approximately 74,000-line items)

13   for 120 key words, and we also searched them for vague business purposes and

14   other criteria, to determine if there were transactions inconsistent with the

15   Employee Expense Policy or our prior rate case commitments or that were not

16   necessary for the provision of utility service. Specifically, we included in the

17   adjustment items that were:

18   • Identified by our key word search;

19   • Considered to have vague business purposes;

20   • For meals exceeding $65 per person;

21   • For business meals that included only Company employees;

22   • Inconsistent with the guidelines in our Employee Expense Policy; or

23   • Identified as generally not being needed for the provision of utility

24   service.

25

1   Q.   PLEASE DESCRIBE THE KEY WORD SEARCH.

2   A.   Based on our experience within our past rate cases, we developed a list of 120

3   key words that were used to identify transactions that may not be appropriate

4   for rate recovery. The list was developed specifically to capture expenditures

5   related to sporting and entertainment events, recreation, celebrations,

6   recognitions, life events, international travel, and lobbying. The key word list is

7   provided in Table 2 to Schedule 8. Transactions initially identified through the

8   key word search were manually reviewed, line-by-line, to determine if the

9   transaction qualified as a recoverable employee expense. Some expenses

10   identified through the key word search are "false positives," which means they

11   are appropriate for recovery although they contain a key word. For example,

12   expenses incurred for vendors such as Holiday Inn Express or Holiday Station

13   Store could be recoverable although matching the search word "holiday." We

14   identified approximately 15,000 transactions within the 2022 data set through

15   the key word search. Approximately 55 percent, or 8,500 of these transactions

16   totaling approximately $92,000, were considered likely to be unrecoverable.

17

18   Q.   PLEASE DESCRIBE HOW THE COMPANY SEARCHED FOR SUMTOTAL

19   TRANSACTIONS WITH VAGUE BUSINESS PURPOSES.

20   A.   We first manually reviewed each 2022 transaction to assess if the business

21   purpose field, by itself, provided an adequate description to determine the

22   business purpose. If the business purpose was vague, such as "dinner," "travel,"

23   or "meeting," we manually reviewed other data fields and examined acronyms

24   and abbreviations. If the combined documentation was not enough to

25   determine an adequate business purpose, the transaction was flagged for

26   removal. A representative (non-exhaustive) list of 229 acronyms that are

27   commonly used by our employees is provided in Table 3 to Schedule 8. Within

1   the 2022 data set, we identified approximately $18,000 for transactions

2   considered to have a vague business purpose.

3

4   Q. DID THE COMPANY IDENTIFY EVERY SUMTOTAL TRANSACTION WITH A VAGUE

5   BUSINESS PURPOSE?

6   A. Identifying vague business purposes is somewhat subjective. While we have

7   made our best effort to identify these transactions, there could be transactions

8   with business purposes others might consider vague. Our Employee Expense

9   Policy provides guidelines for the appropriate documentation of employee

10   expenses, and our employees provide business purposes they believe are

11   reasonable. While an approving manager may find a business purpose

12   reasonable based on knowledge of the work being done by an employee, this

13   business purpose may appear vague to an outside party. We believe that there

14   is always some judgment and subjectivity involved in assessing the business

15   purpose, and do not think that perfection is possible, nor should it be the

16   standard applied. In our review of employee expenses, we conducted a thorough

17   search for vague business purposes and reviewed acronyms and abbreviations

18   included in business purposes when necessary. We believe our effort and the

19   resulting identification of likely unrecoverable expenses are consistent with our

20   commitment in the 2011 test year electric rate case.

21

22   Q. ARE THERE MEALS GREATER THAN $65 PER PERSON, PER DAY INCLUDED IN THE

23   EER SCHEDULES?

24   A. No. We are not seeking recovery for these transactions, and the EER Schedules

25   do not include meals in excess of $65 per person per day. While our Employee

26   Expense Policy guidelines specify that the maximum allowance for an

27   employee's meal expense is now $75 per person, per day, this change occurred

1   in June 2022 (about halfway through the 2022 data set) and we maintained the

2   $65 per person per day limit for the EER Schedules in order to be conservative

3   as to recovery for meals for purposes of this rate case. We have continued to

4   improve compliance with this guideline, but we still identified instances where

5   the meal transactions in SumTotal exceeded the previously allowable $65

6   amount. We identified approximately $2,000 of these transactions within the

7   2022 data set.

8

9   Q. ARE BUSINESS MEALS THAT INCLUDED ONLY COMPANY EMPLOYEES INCLUDED

10   IN THE EER SCHEDULES?

11 A. No. Although we believe there are instances where business meals among only

12   employees are necessary, we are not seeking recovery for these transactions and

13   they are also excluded from the EER Schedules, consistent with past practice.

14   We identified approximately $78,000 related to this type of transaction within

15   the 2022 data set.

16

17 Q. PLEASE DESCRIBE THE REST OF THE SUMTOTAL TRANSACTIONS INCLUDED IN

18   THE REVIEW.

19 A. The rest of the amount determined likely to be unrecoverable from the 2022

20   data set is comprised of SumTotal transactions that are otherwise inconsistent

21   with our Employee Expense Policy guidelines; do not pertain to the State of

22   Minnesota Gas Jurisdiction; or we believe are not needed to provide utility

23   service. Based on our experience, we conducted a manual line and field review

24   to identify these types of expenses, and any transactions identified by the review

25   were flagged for removal. We identified approximately $45,000 of these types

26   of transactions within the 2022 data set.

27

1 Q. ARE EXPENSES FOR INTERNATIONAL TRAVEL INCLUDED IN THE EER
2   SCHEDULES?
3 A. Yes, depending on the business purpose. Our Employee Expense Policy
4   recognizes that international travel is sometimes necessary for conducting
5   Company business, for example, to attend industry trainings and vendor
6   supplier meetings; to audit manufacturing processes at vendors' locations; and
7   to ensure safe operation of our facilities. These types of legitimate and necessary
8   expenses are included in the EER Schedules.
9
10 Q. WHAT IS THE TOTAL AMOUNT OF ADJUSTMENT THE COMPANY IDENTIFIED
11   BASED ON ITS REVIEW OF 2022 SUMTOTAL TRANSACTIONS?
12 A. Based on our review, we identified an adjustment amount of approximately $0.2
13   million based on 2022 SumTotal employee expense transactions. A summary
14   table of these adjustments is included in Schedule 8, p. 10.
15
16 Q. HOW DID THE COMPANY REVIEW EMPLOYEE EXPENSES RECORDED IN SYSTEMS
17   OTHER THAN SUMTOTAL?
18 A. As explained in Section III.B above, the VIM and TIME applications include
19   some 2022 employee expense transactions. In these applications, the descriptive
20   fields available are less extensive than those provided within SumTotal. We
21   identified employee expenses by looking at accounting codes, vendor name,
22   description, and other available transactional data fields. For the identified
23   employee expense transactions, we conducted a line-by-line review to remove
24   transactions that we believe are non-recoverable, like the SumTotal review
25   described above. The process to review VIM and TIME expense data is
26   described in more detail in Schedule 8.
27

1   Q. WHAT ADJUSTMENTS DID THE COMPANY IDENTIFY WITHIN THE VIM AND

2   TIME TRANSACTIONS?

3   A. Based on our review, we identified approximately $8,000 of these types of

4   transactions within the 2022 VIM data set. We did not identify any adjustments

5   within the 2022 TIME data set.

6

7   Q. DO YOU THINK THE RESULTING $0.2 MILLION EMPLOYEE EXPENSE

8   ADJUSTMENT FOR THE MINNESOTA GAS JURISDICTION IS REASONABLE?

9   A. Yes. Our process to identify employee expense transactions for exclusion was

10   rigorous and consistent with the commitments we have made in past rate cases.

11   The slightly different methodology we used in our previous gas rate case (using

12   a percentage adjustment rather than a dollar amount adjustment) was reasonable

13   in that case because the most-recently completed year we were working from

14   was 2020, which was profoundly affected by the COVID-19 pandemic.

15   COVID-era restrictions were mostly not in effect by or during 2022, and so we

16   believe it is appropriate, and ultimately more consistent and reliable, to return

17   to the methodology we used in previous cases. In sum, while we believe our

18   employees generally do a good job of complying with our Employee Expense

19   Policy, this adjustment ensures a reasonable and appropriate amount of

20   employee expenses are included in the 2024 test year.

21

22   Q. ARE TRANSACTIONS THAT WERE CONSIDERED UNRECOVERABLE, AS A RESULT

23   OF THE REVIEW DESCRIBED ABOVE, INCLUDED IN THE EER SCHEDULES?

24   A. No. The EER Schedules do not include any of the transactions that were

25   identified as being unrecoverable. Once the expenses identified as being

26   unrecoverable were removed, the remaining data – O&M employee expense

1   transactions – was sorted to create the EER Schedules corresponding to the

2   categories set forth in the Employee Expense Statute.

3

4   **B.   Details Regarding EER Schedules**

5   Q.   PLEASE DESCRIBE THE INFORMATION REPORTED FOR THE TOP TEN HIGHEST

6   PAID EMPLOYEES AND OFFICERS AS REQUIRED BY THE EMPLOYEE EXPENSE

7   STATUTE?

8   A.   EER Schedules 5A-5J comply with the Employee Expense Statute requirement

9   that we provide itemized employee expense information for the ten highest paid

10   officers and employees. We have provided reports of those officers' and

11   employees' employee expenses for 2022, the most recently completed fiscal

12   year.

13

14   The Employee Expense Statute also requires that we provide compensation

15   information for the individuals on the top ten compensated list. EER Schedule

16   5 includes the State of Minnesota Gas Jurisdiction 2022 actual and the 2024

17   budgeted compensation information for the top ten highest paid officers and

18   individuals. The individuals included on EER Schedules 5 and 5A-5J changed

19   from 2022 to 2024 due to reassignment, retirements, or departures. Company

20   witness Michael P. Deselich describes in his Direct Testimony how we propose

21   to recover costs for employee compensation.

22

23   Q.   IS THE COMPANY REQUESTING RECOVERY OF CORPORATE AVIATION

24   EXPENSES?

25   A.   No. EER Schedule 8 provides the 2022 actual expenses related to corporate

26   aviation, as required by the statute. We note that EER Schedule 8 also includes

27   any food, beverage, lodging, and other travel transactions for the corporate

1   aircraft pilots. The budgeted 2024 Corporate Aviation expense is excluded from

2   the 2024 test year amount.

3

4   Q.   IS THE COMPANY REQUESTING RECOVERY FOR ANY RECREATIONAL OR

5   ENTERTAINMENT-RELATED EXPENSES?

6   A.   No, we do not request recovery of any recreational or entertainment-related

7   expenses, and these are excluded from the 2024 test year Employee Expense

8   Amount. Recreational and entertainment expenses are recorded to FERC

9   account 426.5, Other Deductions. Because this FERC account is treated as

10   below-the-line expense, there are no recreational or entertainment expenses

11   included in current rates or in our rate request, and transactions involving

12   recreational, or entertainment expenses are not included in EER Schedule 3.

13

14   Q.   WHAT HAS THE COMPANY DONE TO ENSURE THAT THERE ARE NO

15   RECREATIONAL OR ENTERTAINMENT-RELATED EXPENSES IN THE EER

16   SCHEDULES?

17   A.   Recreational and entertainment-related costs, charged to appropriate cost

18   elements and/or internal order accounts, are recorded as below-the-line

19   expenses and excluded from the EER Schedules. Our key word search also

20   included related words (e.g., sport-related team names, golf, concert, ticket,

21   social, event, celebration, party, etc.) to identify other transactions that might be

22   related to recreation or entertainment and capture them in the Employee

23   Expense Adjustment. The key word list is provided in Table 2 to Schedule 8.

24

25   Q.   IS THE COMPANY REQUESTING RECOVERY FOR ANY LOBBYING-RELATED

26   EXPENSES?

1   A.   No. We do not request recovery of any lobbying or lobbying-related expenses,

2   and these are excluded from the 2024 test year Employee Expense Amount.

3   Lobbying expenses are recorded to FERC account 426.4, Expenditures for

4   Civic, Political, and Related Activities. Because this FERC account is treated as

5   below-the-line expense, there are no lobbying expenses included in current

6   rates, nor our test-year request. Consistent with the reporting in our past rate

7   cases, transactional data is not included in EER Schedule 9.

8

9   Q.   WHAT HAS THE COMPANY DONE TO ENSURE THAT THERE ARE NO LOBBYING

10   OR LOBBYING-RELATED EXPENSES IN THE EER SCHEDULES?

11   A.   Lobbying-related costs charged to appropriate cost elements and/or internal

12   order accounts are recorded as below-the-line expenses and excluded from the

13   EER Schedules.   In other words, our standard accounting process should

14   ensure that no lobbying-related expenses are included in the Employee Expense

15   Amount. But to make sure we catch anything that might have slipped through

16   the cracks, our key word search also included lobbying-related words (e.g.,

17   lobby, legis, political, election, PAC, senat, and repr) to identify other

18   transactions that might be related to lobbying and capture them in the

19   Employee Expense Adjustment. Additionally, for those employees who lobby

20   from time to time, we reviewed each of their transactions and manually removed

21   any transactions that appeared to be for lobbying or lobbying-related activities

22   on behalf of the Company.

23

24   Q.   ARE ANY OTHER CATEGORIES OF EMPLOYEE EXPENSES EXCLUDED FROM THE

25   EER SCHEDULES?

26   A.   Yes. Spending for life events – such as funerals, weddings, and birthdays – is

27   excluded from the EER Schedules. Expenses charged to the Life Event account

1   are reflected in the 2024 test year Employee Expense Adjustment. In addition,

2   our key word search review of transactions included life event-related words

3   (e.g., floral, flowers, funeral, bereavement, birthday, wedding, baby, etc.) to

4   identify other transactions that were not recorded to the Life Event account so

5   that these transactions could be reflected in the Employee Expense Adjustment.

6   Similarly, expenses that were determined to be for career event celebrations –

7   such as meals for retirement, promotion, or anniversary parties – are reflected

8   in the Employee Expense Adjustment.

9

10   Other expense categories that we are not requesting recovery for are alcohol

11   and entertainment expenses. Any alcohol portion of a meal expense must be

12   itemized separately in SumTotal. The key word search also had terms to identify

13   any other expenses that might be alcohol related. These were all excluded from

14   the EER Schedules. EER Schedule 7 lists all gift expenses, and some of these

15   are typically recovered from rates (e.g., performance-based and safety

16   recognition) and some are included in the Employee Expense Adjustment (e.g.,

17   wedding or birth gift, etc.). Finally, mobile device expenses are not subject to

18   the reporting requirements in the Employee Expense Statute and therefore they

19   are excluded from the EER Schedules.

20

21   Q.   ARE CERTAIN EMPLOYEE RECOGNITION EXPENSES INCLUDED IN THE EER

22   SCHEDULES?

23   A.   Yes. We use a vendor-based recognition program branded as Xcelebrate to

24   administer recognition awards, and these expenses are included in the EER

25   Schedules. The Xcelebrate program is used to recognize excellent work

26   performance and accomplishments. Awards must be approved by leadership,

27   and approval levels vary depending on the award value from manager through

1   Director. Xcelebrate awards are received in points, which can be used for

2   merchandise or gift cards through an online catalog. The highest level of award

3   is equivalent to $100, and this level requires both manager and Director

4   approval. A nomination wizard within Xcelebrate is available to help determine

5   the appropriate award level.

6

7   In addition, the Xcelebrate program is used to recognize years of contribution

8   at five-year intervals as well as retirement. Eligible employees are invited to

9   select a gift from the applicable anniversary/retirement catalog. Transactions

10   administered through the Xcelebrate platform were included in our employee

11   expense review. We continue to believe that employee recognition and

12   appreciation help foster a collegial working environment essential to achieving

13   a high level of productivity and customer service.

14

15   Q.   ARE SAFETY-RELATED RECOGNITION EXPENSES INCLUDED IN THE EER

16   SCHEDULES?

17   A.   Yes. Safety-related gifts and other incentives are included in the EER Schedules,

18   consistent with past practice. For example, a business area may recognize a

19   group or plant for a specific achievement, such as successful and safe

20   completion of a large project or reaching a major milestone without an injury.

21   All safety-related recognition awards, incentives, meals, and gifts must be

22   approved by a manager and/or a safety committee. Safety recognition expenses

23   were included in our employee expense review. This review also included any

24   recognition through the Xcelebrate program discussed above, which has been

25   available for safety-related recognition since 2022. The highest level of award is

26   equivalent to $100. Safety recognition is a necessary and reasonable expense to

1   provide utility service – one of the Company's fundamental goals is to ensure

2   and enhance the safety of our employees and customers.

3

4   Q. EER SCHEDULE 6 INCLUDES PROFESSIONAL ASSOCIATION DUES – ARE THESE

5   INCLUDED IN THE EMPLOYEE EXPENSE AMOUNT?

6   A. Professional Association dues are incurred by our individual employees for

7   memberships in professional organizations in their respective fields. The

8   portion of Professional Association dues that is not considered lobbying is

9   recoverable and included in the test year Employee Expense Amount, as shown

10   on the last page of EER Schedule 6. In contrast, Organizational Dues (including

11   Chamber of Commerce dues) are excluded from the Employee Expense

12   Amount. In Section VI, I separately discuss Organizational Dues, which are

13   dues the Company pays to organizations where the Company itself is a member,

14   including Chamber of Commerce dues. We request recovery for the non-

15   lobbying portion of these dues, as supported in Company Halama's Direct

16   Testimony. Another category of dues not included in the Employee Expense

17   Amount is Social Service Dues, which are considered corporate expenses,

18   recorded below-the-line, and excluded from the 2024 test year.

19

20   Q. WHAT EMPLOYEE EXPENSE DATA IS INCLUDED IN EER SCHEDULES 10, AND 11?

21   A. These schedules contain summary employee expense data from VIM (EER

22   Schedule 10), and TIME (EER Schedule 11). Per our commitment in the 2011

23   electric rate case, we have provided summary data instead of complete

24   transaction details.

25

26   Q. ARE THERE ANY LIMITATIONS IN THE PROCESS USED TO DEVELOP THE EER

27   SCHEDULES OR THE TEST YEAR EMPLOYEE EXPENSE ADJUSTMENT?

1 A. We believe our EER Schedules comply with the requirements in the Employee

2   Expense Statute. However, I note that the process we use to develop the EER

3   Schedules, and the associated test year Employee Expense Adjustment is almost

4   entirely manual and requires that our employees analyze and review many

5   thousands of lines of data. SumTotal does not have the functionality to

6   automatically generate reports that comply with the Employee Expense Statute

7   requirements. Therefore, the development of EER Schedules and the associated

8   test year adjustment continues to be a manual effort that requires judgment.

9

10 Q. CAN YOU RECONCILE THE EER SCHEDULES TO THE 2024 TEST YEAR REVENUE

11   REQUIREMENT FOR EMPLOYEE EXPENSES?

12 A. No. The EER Schedules are based on the actual 2022 employee expense

13   transactions. The employee expense test year revenue requirement of

14   approximately $1.0 million is based on the 2024 budgeted expenses by business

15   areas. As a result, a direct reconciliation of the 2022 EER Schedules to the 2024

16   test year amount is not possible because of the different time periods.

17

18 Q. CAN YOU SUM UP THE 2022 EER SCHEDULES SO THAT THEY MATCH THE

19   ACTUAL 2022 EMPLOYEE EXPENSES IN THE COMPANY'S GENERAL LEDGER?

20 A. No, for several reasons. For example, the 2022 transactions that provide the

21   basis for the 2024 test year Employee Expense Adjustment calculation of $0.2

22   million are included in the general ledger but excluded from the EER Schedules.

23   Also, several EER Schedules have duplicative employee expenses. For instance,

24   transactions in EER Schedule 1A (Vice President and Above Travel and Meal)

25   are also included in EER Schedule 1 (Travel and Lodging) and EER Schedule

26   2 (Meal Expenses). Similarly, employee expense transactions in EER Schedules

27   5A-5J (Top Ten Compensated) are also included in the other EER Schedules.

VI. ORGANIZATIONAL DUES – CORPORATE DUES AND CHAMBER OF COMMERCE DUES

Q. WHAT IS THE PURPOSE OF THIS SECTION IN YOUR TESTIMONY?

A. This section discusses "Organizational Dues," which are dues paid by the Company to various utility associations and to Chambers of Commerce. That is, the Company itself (not individual employees) is a member of such organizations, and these dues are not processed through SumTotal as employee expenses typically are, as I previously explained. In past rate cases, the Company has not included the amounts for Organizational Dues in the Employee Expense Amount. Rather, these expenses have typically been treated as general operating expenses and have been reflected in the Company's workpapers in the initial filings for rate cases.

Q. WERE ORGANIZATIONAL DUES ADDRESSED IN A RECENT COMMISSION ORDER?

A. Yes. As I mentioned above, in its July 17, 2023, FINDINGS OF FACT, CONCLUSIONS, AND ORDER in the Company's most recent electric rate case, Docket No. E002/GR-21-630, the Commission required that the Company "must continue providing information mandated by Minn. Stat. § 216.B, subd. 17, for all costs of dues it seeks to recover regardless of the type of membership (individual, corporate, or chamber)."[3]

Q. HOW IS THE COMPANY COMPLYING WITH THIS REQUIREMENT?

---

[3] *In re Application of N. States Power Co., dba Xcel Energy, for Auth. to Increase Rates for Elec. Serv. In the State of Minn.*, Docket No. E002/GR-21-630, FINDINGS OF FACT, CONCLUSIONS, AND ORDER at 158, Order Point No. 41 (July 17, 2023).

1   A.   As in previous rate cases, the Company is providing detailed reports of the actual

2   organizational dues for the most recently completed fiscal year (2022) in

3   Workpapers, specifically Volume 4, Workpapers, VIII A2 and VIII A4. The

4   information in these Workpapers provides all the information required by the

5   Employee Expense Statute.

6

7   Q.   WHAT AMOUNT OF ORGANIZATIONAL DUES DOES THE COMPANY SEEK TO

8   RECOVER IN RATES IN THIS CASE?

9   A.   Through its budgeting process, the Company has developed a budgeted amount

10   of corporate dues for the 2024 test year, and a budgeted amount of Chambers

11   of Commerce dues for the 2024 test year. These budgeted amounts have been

12   adjusted to remove organizational dues that may not be appropriate for

13   recovery in rates. In addition, the Company is not seeking recovery in this case

14   for any of its organizational dues for the Edison Electric Institute (EEI),

15   Electric Power Research Institute (EPRI), the American Clean Power

16   Association (ACPA), or Minnesota Utility Investors (MUI). MUI was removed

17   because in several recent rate cases it has been the Commission's opinion that

18   MUI serves the interests of utility company shareholders rather than customers.

19   EEI, EPRI, and the ACPA were removed because those organizations'

20   activities are arguably more focused on the electric industry. An additional

21   adjustment has been made to remove the estimated amount of organizational

22   dues associated with these organizations. The adjustments are shown in Volume

23   4, Workpapers, VIII A2.

1   **VII. FLEET CAPITAL INVESTMENTS**

2

3   **A.   Overview**

4   Q.   WHAT IS THE PURPOSE OF THIS SECTION IN YOUR TESTIMONY?

5   A.   I support the Company's capital budget for the Supply Chain business area's

6   Fleet organization.

7

8   Q.   PLEASE DESCRIBE THE FLEET ORGANIZATION.

9   A.   The Fleet organization is responsible for planning, procuring, maintaining, and

10   retiring the Company's fleet assets. By fleet assets, I mean the fleet of cars,

11   trucks, trailers, and construction equipment, and related assets such as garages

12   and fuel depots, that the Company uses to support its provision of safe and

13   reliable service. The Fleet organization is responsible for managing the capital

14   fleet budget for all business areas across Xcel Energy's operational companies,

15   including replacement, maintenance, and repairs for existing fleet vehicles and

16   equipment. The Fleet organization works closely with each business area to

17   ensure a strategic approach that provides the appropriate number of safe and

18   reliable Company vehicles and equipment.

19

20   Q.   PLEASE DESCRIBE THE COMPANY'S FLEET FUNCTIONS IN MINNESOTA.

21   A.   The Company could not accomplish our core service – providing natural gas to

22   customers – without reliable fleet assets and equipment. The construction,

23   maintenance, and repair of the natural gas system necessitates constant travel

24   across Minnesota, which in turn requires the use of trucks, construction

25   equipment, and cars. We also rely on a variety of different types of construction

26   equipment to perform our daily work to maintain the safety and reliability of

1   our gas distribution system. Further, our ability to swiftly and safely respond to

2   emergencies hinges on our crews having reliable fleet vehicles and equipment.

3

4   To that end, the Company maintains a fleet of well over 400 vehicles and

5   equipment that serve Minnesota. We also maintain 15 garages in Minnesota,

6   where we inspect and repair fleet vehicles and equipment. Additionally, we own

7   and operate 12 fueling stations in Minnesota. These Minnesota garages and

8   fueling infrastructure serve all fleet assets for both our Electric and Natural Gas

9   businesses, and the costs of these garages and fueling stations are allocated

10   among those businesses. We operate our own fueling infrastructure to enhance

11   crew efficiencies, to ensure access to diesel fuel for emergency operations, and

12   to accommodate vehicles that cannot use commercial retail fueling stations due

13   to size or other restrictions.

14

15 Q.   HOW DOES THE FLEET ORGANIZATION CATEGORIZE CAPITAL INVESTMENTS

16   FOR FLEET?

17 A.   Although some of the Company's accounting records may group fleet capital

18   investments into slightly different groups, we categorize fleet capital

19   investments into the following groups:

20   • *Fleet Asset Replacements*: investments to replace aging and retiring

21   vehicles, trailers, and construction equipment.

22   • *Fleet Asset Additions*: incremental investments in additional fleet units to

23   meet business area needs for additional crews hired or specific unique

24   work tasks.

25   • *Fleet Capital Repairs*: investments to repair existing fleet assets to extend

26   their useful life.

1   • *Fueling Infrastructure*: investments for replacing infrastructure at
2   Company-owned fueling stations.
3   • *Garage Tools*: investments in essential tooling and facilities infrastructure
4   needed to inspect and repair fleet assets, such as lifts, lubrication
5   systems, exhaust systems, diagnostic equipment, and other mechanical
6   tools.
7
8   These groups differ in some respects from categories used in various places in
9   the Company's accounting records, but we believe the categories are most
10   useful when describing Fleet's operations.
11
12   Q. WHAT ARE THE BUDGETED CAPITAL INVESTMENTS FOR THE FLEET
13   ORGANIZATION FOR THE 2024 TEST YEAR (STATE OF MINNESOTA GAS
14   JURISDICTION)?
15   A. Table 3 below shows, by business area, the actual fleet capital investments for
16   2020-2022; forecasted capital investments for 2023; and budgeted capital
17   investments for 2024. The budgeted capital investments for the Fleet
18   organization total $3.6 million in 2024 for the State of Minnesota Gas
19   Jurisdiction. I will discuss the reasons for the changes in these fleet investments
20   as compared to historic investments in the next section of my testimony.
21

Table 3
Actual and Budgeted Fleet Capital Investments
(State of Minnesota Gas Jurisdiction)

($ 000s)	2020	2021	2022	2023	2024
	Actual	**Actual**	**Actual**	**Forecast**	**Budget**
Gas Distribution	$5,878	$3,208	$4,510	$6,644	$3,109
Common *Fleet, materials, outdoor lighting, facilities…	$104	$185	$247	$215	$441
Total	**$5,982**	**$3,393**	**$4,757**	**$6,859**	**$3,550**

Q. PLEASE PROVIDE AN OVERVIEW, BY COST CATEGORY, OF THE MAJOR PLANNED CAPITAL INVESTMENTS FOR THE FLEET ORGANIZATION FOR THE 2024 TEST YEAR.

A. As Table 4 below displays, Fleet Asset Replacements and Additions are by far the two largest categories of capital investments, comprising together approximately 88 percent of the annual budget for 2024 for the State of Minnesota Gas Jurisdiction. As discussed in greater detail below, we are increasing capital investments to replace aged fleet assets to decrease maintenance costs and to improve performance. We are also investing in additional fleet assets to meet business area needs. Exhibit___(SSB-1), Schedule 9 provides further details of Fleet capital investments by account for the State of Minnesota Gas Jurisdiction.

Table 4
Actual and Budgeted Fleet Capital Investments by Cost Category
(State of Minnesota Gas Jurisdiction)

($ 000s)	2020	2021	2022	2023	2024
	Actual	**Actual**	**Actual**	**Forecast**	**Budget**
Fleet Asset Replacements	$5,951	$3,244	$4,673	$2,565	$2,049
Fleet Asset Additions	-	-	-	4,168	1,177
Fueling Infrastructure	-	57	7	1	155
Fleet Capital Repairs	11	35	3	12	13
Garage Tools	20	57	74	113	156
Total	**$5,982**	**$3,393**	**$4,757**	**$6,859**	**$3,550**

B.   Fleet Capital Investments by Category

1.   Fleet Asset Replacements

Q. WHAT INVESTMENTS ARE PLANNED FOR THE FLEET ASSET REPLACEMENTS
CATEGORY FOR THE 2024 TEST YEAR?

A. We have budgeted $2.0 million for Fleet Asset Replacements in 2024 for the
State of Minnesota Gas Jurisdiction. These budgeted amounts for 2024 include
the replacement of four light duty vehicles, eight medium duty / heavy duty
trucks, and three other items of construction equipment.

Q. ARE ANY OF THESE FLEET VEHICLES BEING REPLACED WITH ELECTRIC
VEHICLES?

A. Yes. Two light duty vehicles that will be replaced in 2024 will be replaced with
a battery electric vehicle (BEV) or a plug-in hybrid electric vehicle (PHEV).
Replacing our current gas-only powered sedans with BEV or PHEVs will
provide benefits in terms of helping to cut carbon emissions and lowering fuel

1   and maintenance costs. Further, as we seek to reduce our carbon footprint, a

2   key component to electrifying our internal fleet is investment in charging

3   infrastructure. Similar to our private fueling stations, charging infrastructure

4   builds resilience into our business and eliminates reliance on a fragmented

5   public charging network. While we wait for the market to present EV

6   alternatives that more closely match our use case and specifications, we intend

7   to focus our time and capital on the prudent deployment of charging

8   infrastructure in support of our Gas business.

9

10   Q.   HOW DOES THE COMPANY DETERMINE WHICH OF ITS FLEET ASSETS NEED TO

11   BE REPLACED IN A GIVEN YEAR?

12   A.   The Fleet organization makes decisions on replacing fleet assets across the

13   Company's operational companies using the total cost of ownership model,

14   which considers the following inputs: age, the number of miles, total hours,

15   repair costs, maintenance costs, the costs of repair parts, and labor costs for

16   repairs of each fleet unit. These inputs track all costs associated with owning,

17   operating, repairing, and maintaining our fleet vehicles during their entire life

18   span.

19

20   Q.   HOW IS THE TOTAL COST OF OWNERSHIP MODEL USED TO DEVELOP THE

21   BUDGET FOR FLEET ASSET REPLACEMENTS?

22   A.   Each year, the Company examines the total cost of ownership for each of our

23   existing fleet assets to determine which fleet needs to be replaced in that year.

24   In particular, a fleet unit is identified for replacement when the costs of owning,

25   operating, repairing, and maintaining a fleet unit exceed the average cost of

26   replacing that unit or when customer service is negatively impacted due to

27   increased instances of breakdowns. This condition-based assessment process

1   means that in one year, the most need for replacing fleet assets may be within

2   one operational company or within one business area. As a result, the annual

3   budget for Fleet Asset Replacements for a Company jurisdiction may fluctuate.

4

5   Q.   WHAT IS DRIVING THE CURRENT LEVEL OF INVESTMENT IN FLEET ASSET

6   REPLACEMENTS?

7   A.   Again, the amounts that we have budgeted for Fleet Asset Replacements for

8   2024 were developed based on the results of the total cost of ownership model.

9   The total cost of ownership model determines the optimal financial age to

10   replace aged fleet assets before they fail or cause unnecessary repairs to a fleet

11   unit that is past its ideal replacement age. The current average age of Minnesota

12   Gas Operations fleet units is 6.5 years. Based on the total cost of ownership

13   model and industry benchmarking, we have determined that the optimum

14   average age of our fleet assets should be 5.7 years. In order to lower the average

15   age of our fleet, we are continuing to make investments in fleet asset

16   replacements in 2024. Additionally, as noted above, the Company is replacing

17   certain vehicles with BEVs and PHEVs.

18

19   Q.   WHY IS IT IMPORTANT TO REPLACE AGING FLEET ASSETS WHEN THE TOTAL

20   COST OF OWNERSHIP MODEL CRITERIA ARE MET?

21   A.   Replacing our fleet in accordance with these criteria reduces the total overall

22   cost to operate and maintain the Company's fleet while maintaining and

23   maximizing the reliability and safety of our fleet assets – both for Company

24   employees and for our customers.

25

26   Older fleet assets are less reliable than newer fleet assets, and this can impact

27   customer service since our crews rely on these vehicles and equipment to

1   perform their work. Further, older fleet assets are sometimes not as safe for our

2   employees or the general public as newer assets because they may not be

3   equipped with the latest safety technology or may have a higher risk of

4   catastrophic component failures. Newer fleet assets also have improved fuel

5   economy as compared to older vehicles, thus providing fuel savings and

6   environmental benefits.

7

8   Moreover, age is the single biggest driver of maintenance and repair costs for

9   fleet assets. The cost to repair and maintain older fleet assets is much higher

10   than for newer assets, as the older assets tend to require more frequent and

11   more extensive maintenance and repairs. As a result, it is important to track the

12   maintenance and repair costs of aging fleet assets to make sure that we replace

13   fleet when the costs of these repairs exceed replacement costs.

14

15   *2.   Fleet Asset Additions*

16   Q.   WHAT INVESTMENTS ARE PLANNED IN THE FLEET ASSET ADDITIONS

17   CATEGORY FOR THE 2024 TEST YEAR?

18   A.   We have budgeted $1.2 million for Fleet Asset Additions in 2024 for the State

19   of Minnesota Gas Jurisdiction. These budgeted amounts for 2024 include two

20   light duty vehicles, three medium duty / heavy duty trucks, and one trailer. Two

21   vacuum excavation or "vac" trucks drive the majority of capital spend for Fleet

22   Asset Additions.

23

24   Q.   HOW DOES THE COMPANY DETERMINE IF IT NEEDS TO INVEST IN ADDITIONAL

25   FLEET UNITS IN A GIVEN YEAR?

26   A.   The business units that operate the fleet assets submit requests with their

27   business justification for additional fleet assets required to complete their work.

1   These requests require Senior Leadership approval prior to the Fleet

2   Organization purchasing the additional fleet.

3

4   Q.   WHAT IS DRIVING THE CURRENT LEVEL OF INVESTMENT IN FLEET ASSET

5   ADDITIONS?

6   A.   The Gas Organization requested additional fleet assets in 2024 for the following

7   reasons. First, the Gas Organization is currently renting two large vac trucks to

8   complete new installations and respond to gas emergencies. Purchasing and

9   owning, instead of renting, the needed vac trucks will reduce costs. Second, a

10   headcount increase in the Gas Organization in recent years requires two pickup

11   trucks and one trailer. Third, the Company's Rice Street Service Center requires

12   a dump truck to accommodate a workload increase. Fleet Asset Additions were

13   paused for 2020 – 2022 to complete a fleet asset utilization study to ensure

14   assets are fully optimized. The study results validated the need for these

15   incremental fleet additions, and the majority of the asset additions suggested by

16   the study were ordered in 2023 resulting in higher forecast for capital additions

17   in 2023 compared to 2024.

18

19   *3.   Fueling Infrastructure*

20   Q.   WHAT INVESTMENTS ARE PLANNED IN THE FUELING INFRASTRUCTURE

21   CATEGORY FOR THE 2024 TEST YEAR?

22   A.   An initial investment in EV charging infrastructure is planned in preparation

23   for EVs replacing internal combustion engine (ICE) vehicles in the Minnesota

24   Gas fleet. This investment includes level 2 EV chargers and ancillary costs for

25   supporting infrastructure like transformers, panels and conduit at our garage

26   and operations centers across Minnesota. The 2024 budgeted amount is higher

1 than the actual costs for 2020-2022 and the 2023 forecast because of the new

2 capital investments in EV charging infrastructure.

3

4 Q. HOW WAS THE BUDGET FOR FUELING INFRASTRUCTURE FOR 2024

5 DETERMINED?

6 A. The budget for these charging systems was developed in conjunction with our

7 fleet replacement plan and associated projected EV deployments and in support

8 of the Company's carbon reduction commitments. Budget development

9 includes input from electric distribution and site design teams, based on

10 historically incurred previous costs for installing similar charging systems.

11

12 *4. Fleet Capital Repairs*

13 Q. WHAT INVESTMENTS ARE PLANNED FOR FLEET CAPITAL REPAIRS FOR THE 2024

14 TEST YEAR?

15 A. Fleet Capital Repairs are capital investments to repair existing fleet assets to

16 extend their useful life. They represent a small portion of the total amount of

17 repair and maintenance work done on our fleet; most of that work is considered

18 operations and maintenance, rather than a capital investment. Typically, engine

19 replacements and transmission replacements are the only repairs treated as a

20 capital investment.

21

22 The amount of Fleet Capital Repairs forecasted for the 2024 test year, for the

23 Minnesota Gas Jurisdiction, is approximately $13,000. For the 2024 test year,

24 the Fleet Capital Repairs were planned based on a recent three-year history of

25 actual repair costs. These costs fluctuate annually and are somewhat

26 unpredictable, because they depend on the number and type of vehicles and

1   equipment, in any given year, which fail in a manner that requires a capital

2   investment to repair.

3

4   *5.   Garage Tools*

5   Q.   WHAT INVESTMENTS ARE PLANNED FOR GARAGE TOOLS FOR THE 2024 TEST

6   YEAR?

7   A.   For Garage Tools, our 2024 capital investments will be related to the

8   construction of new fleet service centers, maintaining and replacing garage lifts,

9   safety related equipment, and other tools.

10

11   Q.   WHY IS THE BUDGET AMOUNT FOR GARAGE TOOLS FOR 2024 HIGHER THAN

12   ACTUALS FOR 2023 AND EARLIER?

13   A.   We have budgeted additional capital in 2024 to support the construction of new

14   fleet service centers. Capital is used to purchase and install cranes, air

15   compressors, and other infrastructure at these service centers needed for

16   employees to do their jobs safely and effectively.

17

18   Q.   WHAT DO YOU CONCLUDE ABOUT THE 2024 CAPITAL INVESTMENT FORECASTS

19   FOR FLEET?

20   A.   I conclude that our capital forecasts for Fleet represent an accurate and

21   reasonable picture of our investments for the 2024 test year. Therefore, these

22   forecasts can be relied on to set just and reasonable rates for our customers.

23

VIII. COMPLIANCE ITEM ON LOBBYING COMPENSATION

Q. DO YOU PROVIDE COMPENSATION INFORMATION FOR EMPLOYEES ENGAGED IN LOBBYING?

A. Yes. In its 2011 test year electric rate case (Docket No. E002/GR-10-971), the Company agreed to include in its next rate case a report of the total compensation for employees engaged in lobbying, with an explanation of the costs included and excluded in the rate request. Although that requirement is not binding here, the Company voluntarily continues to provide this information and it is provided in Volume 3, Required Information, Section IV Other Required Information, Tab 3. The scope of the information presented in this schedule and EER Schedule 9 is consistent with the approach taken in our past rate cases.

IX. CONCLUSION

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. Our 2022 EER Schedules contain the employee expense information required by the Employee Expense Statute. We have conducted a rigorous review to ensure that employee expense costs included in the test year are consistent with the Employee Expense Statute, the commitments in our prior rate cases, and the guidelines in our Employee Expense Policy.

For employee expenses, we have made a 2024 test year rate case adjustment of $0.2 million. For corporate aviation, we have made a 2024 test year rate case adjustment of $0.3 million. This adjustment ensures that reasonable and appropriate costs are included within the 2024 test year.

1

2   We are requesting recovery of approximately $0.8 million for employee

3   expenses for 2024. We have budgeted $3.6 million in 2024 for Fleet capital

4   investments to maintain reliable, high quality utility trucks and other equipment.

5

6 Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

7 A. Yes, it does.

Statement of Qualifications

Sangram S. Bhosale

Sangram Bhosale is the Vice President and Chief Supply Chain Officer for Xcel Energy Services Inc. At Xcel Energy, Sangram is responsible for leading the supply chain and fleet organization that manages all external spending on material, equipment, and services except for fuels, all capital spares, consumables, and parts inventories across 71 warehouses and 7,500 vehicle assets across eight states.

Sangram has over 25 years of experience in procurement, supply chain management, and operations, including various leadership and management consultant roles. Sangram's experience includes successfully architecting and implementing enterprise-wide transformation programs and leading procurement and supply chain organizations. In addition, as a management consultant earlier in his career, Sangram advised executives and led client engagements related to organizational transformation, strategy development, procurement, supply chain management, operational excellence, and asset optimization at global 500 companies. Sangram joined Xcel Energy in 2020 in his current role.

Sangram graduated from the College of Engineering, Pune, where he earned a Bachelor of Science degree in Mechanical Engineering. He earned a Master of Science in Industrial Engineering and Management from Oklahoma State University. He also earned a Master of Business Administration from the University of Chicago Booth School of Business

Travel and Expense Policy

XcelEnergy®

Policy 10.2

Purpose

This policy sets forth expectations regarding the use of the corporate credit card for approved business-related expenses and the expense statement filing requirements. It also outlines the requirements for business travel, meals, entertainment, recognition and more.

Applicability

The Travel and Expense Policy ("Policy") applies to all employees of Xcel Energy Inc. and its subsidiaries and affiliates ("Xcel Energy").

Consultant travel and business-related expenses should be managed in accordance with a negotiated contract and the Contractor Guidelines for Expenses. Business related expenses must be reimbursed through Professional Service Agreements established with consultant or consulting firm.

Staff Augmentation Contractor travel and business-related expenses must be invoiced by contracting agency under the terms of its Master Staff Augmentation Services Agreement with Xcel Energy. The agency is responsible to reimburse the agency's workers expenses.

Policy Highlights

- Employees should make cost-effective and policy-compliant decisions.
- Leaders should carefully review and approve all expense reports.
- Call the Supply Chain Hotline Support at 303-628-2644, Option 1 with questions.

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Administrative

- Corporate Credit Card
- Expense Statement Filing
- Receipts and Records

Travel, Meals, Entertainment and Recognition

- Business Meetings and Events
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- Mobile Devices
- Personal Protective Equipment Allowance

If you have questions regarding this Policy, please contact the Supply Chain Hotline at 303-628-2644, Option 1.

Requirements and Responsibilities

General Statement Regarding Travel & Expense Reimbursement

Upon leader approval, Xcel Energy will reimburse employees for reasonable travel and business-related expenses that the company normally considers deductible under the Internal Revenue Code and regulations for deductible business expenses. Employees are expected to use sound business judgment and plan travel and other business-related expenses to minimize costs.

Corporate Credit Card

Employees who incur travel and other related business expenses will be issued, and are required to use, a company-sponsored corporate credit card. Use of the corporate credit card must be in accordance with this Policy and the Buying Matrix. If you have questions about expenses not covered in this Policy or in the matrix, please contact the Supply Chain Hotline.

For procurement purchases using a, corporate credit card see the Procurement of Normal Goods and Services policy (4.10).

Card Request and Eligibility

Employees must submit an application and meet the following criteria to be issued a card:
- Receive approval from their leader and Supply Chain
- Be an active full-time employee
- Read and sign the Cardholder Agreement
- Complete required online corporate credit card training prior to receiving the card. If training is not completed, the employee's card may be subject to closure. Approval from Supply Chain management will be required to obtain a new credit card.

Staff Augmentation Contractors are not eligible for a corporate credit card. Staff Augmentation Contractors can seek reimbursement for expenses through their contract agency or invoice based on the Professional Service Agreement.

Card Transaction Limits

The Xcel Energy standard corporate credit card transaction limits will apply unless other limits are requested and approved or deemed suitable by the Corporate Card Admin team.

If an employee is required to make a purchase that is greater than the assigned limits, they must complete and submit either a Corporate Credit Card Request - Corporate Credit Card Limit Increase - MCC Unblock Request, which will require a higher level of approval. Splitting transactions that are greater than the assigned limits is not allowed.

Card Security
   Corporate credit cards are assigned to individual employees and must be used only by the employee whose name is on the credit card. The assigned employee is responsible for the physical security of their corporate credit card at all times. Employees are required to adhere to the following:
   A. Usage of the corporate credit card by an employee other than the assigned employee, is strictly prohibited and will result in card termination and potential discipline.
   B. For anything other than an online or phone purchases, employees must not share their card information including the card number, expiration date, security code or PIN.
   C. Lost, stolen, compromised, or damaged cards must be reported to US Bank (800-344-5696) and internally through a Get Assistance Ticket submission immediately.
   D. Any updates to personal information including legal name, home address must be updated internally via a Personnel Action Form.

Employees can utilize mobile pay as a payment method, which provides the convenience of a touchless payment transaction. Mobile pay offers security by digitally encrypting your card information at the transaction level while stored in your mobile device. Additionally, a password or fingerprint will be required to unlock your device.

Employees can opt-in for fraud alerts via US Bank Access Online. It is the employee's responsibility to notify and/or respond to US Bank immediately regarding all fraudulent transactions, retrieve a new card, obtain and return required paperwork, and ensure credits are received and reconciled to offset charges.

Blocked Purchases
US Bank uses merchant category codes to classify merchants and business by the type of goods and services provided. Merchant category codes ("MCC") categorize, track and restrict transactions. Certain category codes will be blocked for Xcel Energy employees. Employees must proactively verify the merchant category code is not blocked before making a purchase. To determine what MCC the merchant falls under, employees can enter the supplier information here and identify if the code is blocked or not assigned to their profile.

If an employee's card gets declined when making a purchase, they should call the Supply Chain Hotline. Blocked purchases must not be made with cash or personal card.

Employees will need to request permission to unblock merchant category codes by submitting a Corporate Card Authorization Request, either as a One-time authorization (1-2 transactions per year) or a Permanent authorization (more than twice per year). For information on Merchant Category Codes, visit this website.

Technology Purchases
Technology purchases are by default considered unsuitable for purchase via the corporate credit card. See Procurement of Normal Goods and Services policy 4.10 for additional details.

Purchasing Travel for Another Employee
Purchasing travel for another employee is discouraged and requires pre-approval by the business area vice president.

Personal Use of Corporate Card
Personal purchases of any type using the corporate credit card are not permitted. In the event that the corporate credit card is used inadvertently for a personal purchase, the employee must mark the expense as "personal" on the expense report, notify their leader and reimburse the Company. Personal use expenses are monitored to ensure the corporate credit card is used appropriately. The willful intent to misuse the corporate credit card (i.e., knowingly making personal purchases) may be subject to card closure and/or discipline, up to and including termination of employment.

Use of Personal Card or Cash Out of Pocket

The use of personal card or cash out of pocket for business purposes should be rare. Unless otherwise noted in this Policy (e.g. tips, tolls, mobile), it is only appropriate to claim cash out of pocket reimbursement for expenses incurred while traveling when credit cards are not accepted or if an employee inadvertently uses a personal credit card for business travel or business-related expenses. The employee should claim the business expense as "cash out of pocket" on the expense statement and attached the proper detailed itemized receipt documentation. Cash out of pocket expenses should be submitted within 30 days of the transaction date and are monitored to ensure the   corporate credit card is used appropriately.

Expense Advances

Cash advances for travel expenses or reimbursement of travel expenses prior to submitting an expense reimbursement statement are not allowed.

Capital Charges with a Corporate Credit Card

Use of the corporate credit card for capital purchases must ensure alignment with the Capital Charges with Corporate Credit Card Guidelines. Employees should contact the Capital Asset Accounting Group with any questions regarding capital purchases.

Leave of Absence or Employee Termination

Employees are responsible for expensing all card transactions prior to one of the following events:

- Leave of Absence: The employee's leader must immediately complete a Get Assistance Ticket on behalf of their employee to report the leave. The card will remain suspended while the employee is on leave.

- Employee Termination: In the event of termination, the employee's leader must collect the credit card and any other Company owned resources at the time of voluntary or involuntary termination. Leaders are responsible to conduct an inventory of company equipment and personal items to ensure the individual receives their personal effects in a timely manner.

If a terminated or suspended employee continues to use their card, they may be liable to the company for the unauthorized charges. The cardholder employee may also be subject to criminal prosecution.

Expense Statement Filing

Each employee is to include only their expenses on an expense statement. Leaders can include on their expense statements minor expenses for their employees who do not ordinarily use an expense statement. Expenses for special meetings, conferences, conventions, seminars, industry meetings, training classes and travel are reimbursable and may be combined with routine expenses on one expense report. Employees may include on their expense statement, expenses for meetings, conferences, meals, etc. where the leader(s) is in attendance with other staff and charged to a subordinate's corporate credit card.

Proxies

Xcel Energy allows the use of proxies in the expense report process. The term "Proxy" applies to an employee who acts on behalf of another employee (e.g., creates and submits and/or approves expense reports). Proxies can only approve reports if they have the approver role in the Expense Management System. Only supervisor level and above have the approver role in the Expense Management System. Employees/Proxies and Approvers will be held equally accountable for the accuracy of report information.

Expense Report Submission Timing

Employees should submit only one expense report per month within 30 days of the transaction date for both Cash out of Pocket and corporate credit card expenses. Employees can choose a day of the month and submit

their expenses in the Expense Management System each month on that date to maintain the 30-day submission window. Employees will be notified if expenses are not submitted within 30 days of the incurred expense. Daily notifications will be sent for expenses that are not submitted within 45 days of the incurred expense.

Expense statements not submitted within 60 days will cause the employee's corporate credit card to be suspended until the report is in an Approval Complete status and any pending expenses dated greater than 30 days have been reconciled. In accordance with IRS regulations, any employee expenses not claimed within 60 days of when the expense was incurred may be deemed taxable income to the employee.

Expense statements that are 90 days delinquent will cause the employee's corporate credit card to be suspended until appropriate approvals have been obtained. Approval from the Director of the individuals associated business unit must be obtained, and completion of The Travel and Expense Policy Appropriate Use of Your Corporate Credit Card LMS Course will be required to reinstate use of the credit card.

<u>Proper Documentation for Expenses</u>
For Internal Revenue Service (IRS) reporting, proper documentation for expenses is required, including a complete business purpose. Business purposes must adequately describe why the expense was incurred, not what the expense was. For example, an appropriate business purpose for an overtime meal expense while working on a boiler repair would be: "Overtime Meal — Boiler Repair." One-word descriptions such as "dinner" or "tickets" are not considered adequate. Abbreviations may be used in the business purpose as long as the abbreviation is spelled out on the receipt or in the description field.

Employees must allocate expenses to the correct accounting and expense type. Employees must update any predefined/default I/O numbers in the Expense Management System when their accounting codes change (due to a role change, for example). Employees should contact their Business Area <u>Finance Representative</u> if they have any questions regarding the correct accounting or expense type.

<u>Expense Approval</u>
Leaders are required to use discretion based on business needs and approved budget when approving expenses. Leaders and/or Proxies who approve reimbursement for travel and business expenses are ultimately responsible for the overall accuracy and completeness of the expenditures being claimed and must ensure:

- All transactions are adequately documented.
- All transactions are appropriate and comply with all company policies and procedures.
- Any exceptions are warranted and properly documented.
- Correct type of cost and expense type have been assigned.
- Necessary detailed itemized receipts have been included.
- Other necessary documentation has been provided.
- Preferred suppliers were used.

Receipts and Records
The company requires records and detailed itemized receipts to qualify the employee as having "accounted to their employer" for reimbursement of expenses, as defined by the Internal Revenue Code.

The following instances always require a detailed itemized receipt:

- All expenses using a personal credit card or cash, regardless of amount. Exceptions include reasonable tips and tolls.

- All lodging expenses. This is to ensure appropriate accounting for sales and use tax. In addition, the itemized detailed receipt for any expenses charged to the lodging bill must be submitted. Hotels will provide an itemized receipt if requested.

- All purchase-type expenses (such as materials, subscriptions, tangible goods or anything other than typical travel expenses) regardless of amount. This is to ensure appropriate accounting for sales and use tax.

- Authorized invoice payments using the Corporate Card. The invoice must be uploaded into the Expense Management System and the following details are required in the description box: the invoice number and the name of the ultimate seller/vendor if the transacted merchant does not align.

- Airline travel and service fees. The itinerary showing the amount charged is the required detailed itemized receipt.

- Costs associated with alcohol purchases. Alcohol purchases must be broken into separate expense types.

- Meals at or above $25 with tip included. Tips must be properly documented on the receipt or outlined in the description box. The itemized receipt for a business meal must include the specific business purpose, first/last name and title of those in attendance, including affiliation/company of non-employees and business relationship, such as "employee" or "guest." Group meals that exceed 20 people require a sign-in sheet that outlines the group in attendance with names and relationships as supporting documentation.

- All travel type expenses at or above $25.

- Multi-trip mileage requires use of a Mileage Authorization form. Single mileage trip detail (for a one-way or round trip) can be entered in the system. Employees must disclose the point of departure and destination with the exact address, service center name or airport code and the total miles for the trip.

Credit Card Receipts
Machine-produced detailed itemized receipts are required and must be submitted along with the credit card receipt to support documentation. If the employee's credit card number is displayed on the receipt, black out all but the last four digits to protect sensitive information.

Lost Receipts
If a receipt is lost or not available, the employee must complete and sign a Lost Receipt form, verifying the legitimate expense. This documentation then serves in place of a detailed itemized receipt. Employees should add information in the description section of the Expense Management System explaining relevant details for expenses incurred that are not self-evident.

Business Meeting & Events
Whenever possible, business meetings should be held on company property and limited to business requirements.

When off-site business meetings and events are required, every effort should be made to use existing contracted corporate agreements or contracted hotels. The Travel Management Company agent will support the identification of contracted meeting spaces.

Entertainment
Any expenses associated with entertaining employees and/or non-employees are reimbursable only when the principal purpose of the activity benefits the company.

Modest and appropriate meals and/or entertainment may be provided to persons who have business with Xcel Energy. Such meals and/or entertainment given must be in connection with a business discussion and must comply with Xcel Energy's Conflict of Interest guidelines outline in the Code of Conduct.

Entertainment - Travel	Travel expenses related to entertainment events (e.g., airfare, lodging, rental car).

Entertainment - Meal	Meals related to entertainment. Includes non-employees or the combination of employees and non-employees. Any entertainment expenses for employees only should be considered recognition. Refer to the Employee Recognition section.
Entertainment - Tickets	Charges associated with any ticketed sporting event or other ticketed entertainment, as well as costs associated with recreational events (e.g., golfing, fishing, resort activities, etc.). Includes non-employees or the combination of employees and non-employee.

Meal Expenses

Meal expenses includes food, non-alcoholic beverages, alcoholic beverages, and associated taxes and tips. The correct expense type must be used for:

- Travel Meals
- Business Meals
- Entertainment Meals
- Recognition Meals (See Employee Recognition)

The recommended per-meal guidance is breakfast $8-10, lunch $10-20 and dinner $20-45. The maximum allowance is $75 per person, per day, including food, non-alcoholic beverages, alcoholic beverages and associated taxes and tips. If an employee exceeds the $75 per person, per day maximum they must submit written approval from their business unit vice president with the receipt(s).

When two or more employees attend a meal for company business, the highest-ranking employee must submit the costs for reimbursement. However, expenses for large team meetings, where leader(s) attend with other staff, may be charged to a subordinate's corporate credit card and included on the subordinate's expense statement.

Meals related to approved professional organizations, industry or trade associations are reimbursable.

Business Meal (Emp Only)	Business Meals with only employees' present will be reimbursed when the meeting has a valid business purpose and could not have been reasonably conducted during regular business hours. Meals to discuss casual business matters will not be reimbursed. If the business meal occurs while traveling with employees, it should still be classified as a business meal.
Business Meal (Non Emp)	Business Meals with employees and non-employees that principally benefit the company may be reimbursed if the business cannot be reasonably conducted during regular business hours. If the business meal occurs while traveling with non-employees, it should still be classified as a business meal.
Travel Meal	Meals and beverages incurred while traveling for business. If the meal is for a valid business meeting, it must be classified as a business meal and not a travel meal, even if the meal is incurred while traveling. Meals consumed with other traveling employees in which business is not the focus should be classified as a travel meal and separate tabs are preferred.
Entertainment - Meal	Meals related to entertainment. This includes non-employees or the combination of employees and non-employees. Any entertainment expenses for employees only should be considered recognition.

Alcohol Expenses

Employees should consider the appropriateness and the company's liability when serving and/or consuming alcohol. Employees must comply with the company's fitness for duty provisions outlined in the Alcohol and

Drug-Free Workplace Policy (9.3).

All costs associated with alcohol purchases must be broken into separate expense types on the expense report.

Tips and Gratuities

Tips and gratuities should be reasonable in relation to the locale visited, commensurate with the service performed. The amount of percentage of any gratuity paid should not exceed 25% and must be allocated to the Gratuity sub-expense and visible on the receipt.

Air Travel

Before booking any travel arrangements, employees must determine the business need for the trip and consider less costly alternatives, such as teleconferencing or other conferencing options.

Commercial Air Travel

Air travel costs constitute the largest controllable travel expense incurred by Xcel Energy. Employees must use the Travel Management Company's online booking tool when making air travel arrangements to take advantage of negotiated financial savings, track unused or cancelled airline tickets and for employee safety reasons. Booking outside our Travel Management Company is prohibited.

Travel arrangements should not be based on availability of upgrades, frequent flyer awards or bonus points. The Travel Management Company is not authorized to book first-class or business-class air travel and related expenses are not reimbursable. Employees requesting premium seat upgrades must seek approval from their leader (director-level or above). Premium seat assignment is defined as bulkhead, aisle, and exit row or premium economy.

Contact the Travel Management Company to negotiate discounted rates for group travel of 10 or more traveling together. Avoid penalty fares and refundable tickets.

In general, a non-refundable ticket is less expensive than a fully refundable ticket. Non-refundable tickets must be purchased whenever available. Every attempt must be made to book travel at least 14 days in advance of the trip. If plans change and a future trip is anticipated, the ticket can still be used. Last-minute arrangements, changes and/or cancellations should be avoided whenever possible as they substantially increase travel costs and frequently result in penalties.

Employees are responsible for canceling reservations. Employees must notify the Travel Management Company of the unused ticket so the credit information is properly recorded and applied to the next ticket purchased. A change fee and any increase in the non-refundable fare at the time of the ticket change will apply. However, the additional charges are generally still less than the cost of a full coach fare. Employees must submit a copy of the original itinerary and documentation of additional charges with their expenses.

Tickets for air travel will be issued as electronic tickets whenever possible and will be e-mailed, along with an invoice/itinerary, directly to the e-mail address in the employee's profile. Paper tickets will be issued only for airlines that do not offer electronic tickets. Service fees for booking airline reservations are reimbursable.

Early Arrival or Extended Stay

Employees may arrive early or extend their stay at a business destination for up to two days for reimbursement purposes provided the additional stay results in an overall savings to the company. Spousal travel expenses are not reimbursed as part of this program. A travel itinerary provided by the Travel Management Company, substantiating the cost savings, may be required prior to reservation by the approving leader, Corporate Card Team or Audit Services. Other expenses incurred during the extended stay of a personal nature, such as sightseeing or recreational expenses, will not be reimbursed.

The frequency of extended stay for employees traveling on company business is at management's discretion.

Frequent Flyer Miles and Points
Frequent flyer miles and points for hotel stays (or other reward programs) accrued when traveling on company business may be used for upgrades, business or personal travel. Choosing a particular supplier to maximize personal frequent flyer miles or booking through hotel or other internet websites to maximize hotel points is not permitted. Xcel Energy does not reimburse expenses related to frequent traveler programs.

Executive Travel
Restrictions on management levels traveling together are intended to ensure continuity and guard against the loss of senior leadership should an accident occur. The following restrictions apply to air travel:

- Xcel Energy's Chief Executive Officer (CEO) shall travel with no more than two EVPs.
- Xcel Energy's Chief Executive Officer (CEO) shall travel with no more than 50% of their direct reports (excluding executive admin).
- No more than three EVPs or a total of five CEO direct reports shall travel together.
- No more than 50 percent of EVPs or SVPs direct reports can travel with them.

The CEO must approve exceptions to these restrictions prior to travel.

While these travel restrictions focus on executive management levels traveling together, similar guidance should be considered with any team level.

Corporate Aircraft
In order to efficiently transport employees and business associates throughout the United States and Canada, the Company operates corporate aircraft. Corporate aircraft are used to save time and enhance employee productivity.

The priority for use of corporate aircraft is determined by the needs of:
1. Executive Committee Members
2. Vice president level direct report to an Executive Committee Member
3. Other employees

The following are authorized to schedule corporate aircraft:
- Executive Committee Members
- Vice president level direct reports to an Executive Committee Member

A flight may be flown without an Executive Committee Member or vice president level direct report to an Executive Committee Member to either reposition, is deemed cost-effective and approved by an Executive Committee Member.

Commercial travel should be considered first for long distance, single-destination trips requested by executives other than the CEO. CEO and direct reports are permitted to travel business-class on commercial flights when it is more cost effective than using the corporate aircraft.

Open seats on scheduled flights are available to any employee traveling for business at no charge to the business area. Reservations for open seats are made on a first-come-first-serve basis.

Cancellations of confirmed seats must be made well in advance to ensure enough time to clear waitlisted passengers who might otherwise have flown commercially.

Bumping is allowed as a last resort to meet the needs of Executive Committee Members or members of the

Xcel Energy board of directors. A business unit vice president can bump with seven days' notice.

Flights are generally limited to four days per week involving travel between Minneapolis, Denver and Amarillo.

A flight with fewer than five passengers may be subject to cancellation.

Aircraft Schedules and Passenger Schedules can be viewed on the Aviation Services website. The Aircraft Schedule shows all scheduled flights for the next 60 days. The Passenger Schedule shows trip reservations and ground travel requirements for each passenger in the same upcoming 60-day period.

To make a reservation on the corporate aircraft, employees must contact the Aviation Services Travel Scheduler. A description of the business reason for the travel must be submitted with reservation requests.

Passengers must comply with all flight safety rules and procedures. The aircraft pilot-in-command maintains final authority on aircraft operation and safety of flight. Smoking and alcohol consumption is not permitted on board company aircraft. A passenger who appears to be intoxicated will not be allowed on-board. Hazardous materials are not allowed on company-owned or contracted aircraft. Firearms are not allowed on company-owned or contracted aircraft unless approved by the CEO or required by the Transportation Security Administration (TSA) into certain airports.

Flights on corporate aircraft will not be scheduled for personal use. Limited non-business travel for employees and/or their relatives on corporate aircraft will be permitted on business trips only if seats are available and approval is obtained before the flight from the Director, Aviation Services. In accordance with IRS requirements, personal travel may result in additional imputed personal income and additional income taxes to the employee benefiting from the personal travel, based on published U.S. Department of Transportation Standard Industry Fare Level (SIFL) rates.

Non-employee passengers whose flights are supporting Xcel Energy business must have their transport on corporate aircraft pre-approved by an employee at or above the vice president level. In addition, approval must be obtained from the CEO prior to the transport of candidates for public office or elected/appointed public officials on corporate aircraft. Two general rules follow:

- Local, state or federal candidates or their representatives should not be transported during an election campaign in which they are candidates.
- Avoid situations where the transport of any candidate or public official could be construed as an attempt to influence the outcome of an election or any pending or proposed legislation that is of interest to the company.

Charter Air Services
Employees may use charter air services when corporate aircraft are not available and travel by commercial airline is not a feasible alternative, provided that Aviation Services screens and approves charter air services prior to use to ensure the charter operator's compliance with safety procedures, crew qualifications, aircraft airworthiness and adequate insurance coverage. Xcel Energy Aviation Services schedules such charters so that their use can be documented for possible Federal Aviation Administration or legal inquiries and to monitor the quality of service provided.

Travel on Non-Xcel Energy Business Aircraft
The Director, Aviation Services should provide approval to employees before they travel on another company's private aircraft to ensure compliance with standards established for corporate aircraft operations or charter contractors.

Personal Aircraft
Due to liability and insurance coverage concerns, employees are not permitted to travel on behalf of the

company in personal aircraft or aircraft not flown by professional pilots. Personal aircraft refers to aircraft owned, rented or operated by individuals whose primary job function is not that of a pilot.

International Travel

International Business Travel

All international travel must be approved at the business unit vice president level prior to making a reservation, excluding Canada. Employees traveling internationally are required to book travel according to the air travel practices listed in this Policy, with the following additions:

- Submit an International Travel Form, including for Canada, at least two weeks prior to travelling abroad. A member of the Enterprise Security and Emergency Management (ESEM) team will review the form to assess physical and cyber risk, as well as overall threat. Additionally, a member of the legal team will review the form for export controls compliance.

- Call the corporate credit card customer service and Supply Chain Hotline to inform them of the upcoming international trip. This helps ensure that the employee's card is not inactivated for unusual activity.

- If any one particular leg of the flight is greater than six hours in duration and/or crosses an ocean, it is permissible to consider upgrading to business class. Final approval to upgrade to business class must be obtained from the employee's business unit vice president or higher before booking.

- Additional consultations with ESEM and/or Threat Intel may be required or requested prior to the employee's departure.

- A Pre-Trip Advisory (PTA) document may be requested for any destination or provided for destinations with elevated security risk.

International Personal Travel

Employees traveling internationally for personal reasons may choose to submit an international travel form. If the employee is planning on taking Xcel Energy assets (i.e. laptops, thumb drives, cell phones) abroad, they must follow the additional instructions below. Employees are strongly discouraged from taking Xcel Energy assets abroad, regardless of the risk level of the destination.

If an employee intends, or is required, to take Xcel Energy assets abroad, the employee must:

- Receive business unit vice president approval to take the asset(s) on their personal trip.
- Submit an International Travel Form, including for Canada, at least two weeks prior to travelling abroad. A member of the Enterprise Security and Emergency Management (ESEM) team will review the form to assess physical and cyber risk, as well as overall threat. Additionally, a member of the legal team will review the form for export controls compliance.

Foreign Currency Transactions

For expenses incurred when traveling to another country (including Canada), the expenditures recorded on the expense report must be in U.S. dollars, reflecting the proper exchange rate.

When cash expenses are incurred in foreign currency, it is the employee's responsibility to obtain the most favorable official currency conversion rate.

Combined Business and Personal Travel

When combining personal and company business travel, the business trip portion must be booked through the Travel Management Company. The personal travel portion may also be booked with the travel management

company; however, all personal travel costs must be paid for separately.

Employees may arrive early or extend their stay at a business destination. For more information on early or extended stay, refer to the "Early Arrival or Extended Stay" section.

Spousal Expenses

Costs for travel, lodging, meals or other travel expenses for spouses or other family members will not be reimbursed unless the individual has a bona fide company purpose for engaging in the travel or attending the event and the expenses are approved at the senior or executive vice president level. Such travel is generally limited and should be rare.

Non-Reimbursable Travel Expenses

Non-reimbursable expenses include:

- Travel Expenses related to other third-party travel tools which include but are not limited to: Orbitz, Expedia, Hotels.com.

- Incremental expenses incurred as a result of personal stopovers, weekend side trips or other personal travel scheduled within or around the business itinerary.

- Excess baggage charges for personal items (excluding bag fees required by the airline, such as for the first checked bag), personal grooming, laundry services, health-related expenses, guest travel, late payment fees associated with reimbursement for use of personal credit cards, personal travel insurance, loss of cash advance money or personal funds, dependent care expenses and household expenses incurred during an employee's travel.

- Purchase of luggage, clothing or other personal items is not reimbursable. If items are lost in transit, employees should replace items, attempt reimbursement through airlines (or other vendors), then through their homeowners insurance.

- Traffic/parking fines (for both personal and fleet vehicles), court costs, airline club memberships, class upgrade charges for airline (excluding pre-approved premium seat upgrades), personal entertainment expenses, personal gifts, personal reading materials and airline headset rental.

Hotels/Lodging

Employees are required to use the Travel Management Company's online booking tool when making lodging arrangements. Using any other source may cause the company to be out of compliance with security requirements and lose negotiated financial benefits. In addition, by using the Travel Management Company to make lodging arrangements, it allows the Company to quickly locate employees during a security concern.

Xcel Energy has negotiated certain discounted hotel rates at contracted properties. These hotels should be used whenever possible for overnight accommodations on business trips when the contracted property is close to the employee's final destination. Where negotiated discount rates are not available, the Travel Management Company will recommend good quality, moderately priced hotels. Service fees for booking hotel reservations are reimbursable.

When attending a meeting, conference or other event that has a designated booking channel for hotel rooms, please contact the Travel Management Company to make the lodging arrangement.

Employees may be able to secure lower rates by supplying individual travel club information. Employees should include this information on their travel profile to ensure that the Travel Management Company can access those rates at the time of booking.

Lodging in the Local Area
Employees who are attending an off-site meeting and reside in the same local area should commute to and from the meeting rather than stay in a local hotel, unless the length of the meeting or commute time represents an undue burden. If an employee feels this is an undue burden, they should discuss this with their leader (director-level or above), in advance, who may approve other arrangements.

Cancellations
Room reservation cancellations must be made according to instructions on trip itineraries to avoid a "no-show" charge. Employees should contact the Travel Management Company to make cancellations. Employees who must cancel a reservation on their own should note the cancellation number and hotel contact person. Xcel Energy will not reimburse "no-show" charges.

Telephone Charges While Traveling

Employees traveling should make business-related telephone calls from company locations whenever possible, and/or use a calling card or Mobile Device to avoid direct-call fees from hotels or other public locations that charge high rates. While traveling, reimbursement of personal telephone calls of a reasonable duration and frequency is permitted provided the employee uses the most economical means available.

Non-bargaining employees who use their Mobile Device for incidental business or personal telephone calls while traveling, and who do not have a Personal Responsible Account, may request reimbursement as outlined in the Mobile Device Standard.

Vehicle Use
Ground Transportation for Travel
Employees may use their personal vehicle over air travel, provided the expenses are less than the lowest available round-trip airfare that would have been scheduled for the employee by the Travel Management Company. When evaluating costs, the employee must include expenses associated with the trip to and from the airport and any costs associated with vehicle rental or ground transportation at the business destination. When using a personal vehicle, the standard approved mileage rate for the most direct route to and from the business destination, and meals and lodging expenses for the travel time, should be included for comparison purposes.

Approval for selecting ground transportation over air travel must be obtained in advance from your business unit vice president or higher. All expenses must be supported with appropriate detailed itemized receipts and documentation, and reimbursement will be for the employee share only. Documentation of the lowest available round-trip airfare provided by the Travel Management Company must be included with expense filing statement.

Mileage
Personal vehicles driven for Xcel Energy business purposes must be of reasonable value, in good repair and in safe operating condition. Motorcycles shall not be used.

Ground transportation expenses are reimbursable when employees use their own vehicle for required company business and the mileage exceeds the mileage between the employee's home and regular work location(s). For documentation purposes, employees must disclose the point of departure, the destination and the total miles for the trip. Employees should be aware that if mileage is paid, but is not reimbursable under IRS guidelines, that reimbursement to the employee is taxable income per IRS regulations.

The following illustration depicts the rules used to determine if ground transportation expenses are reimbursable.
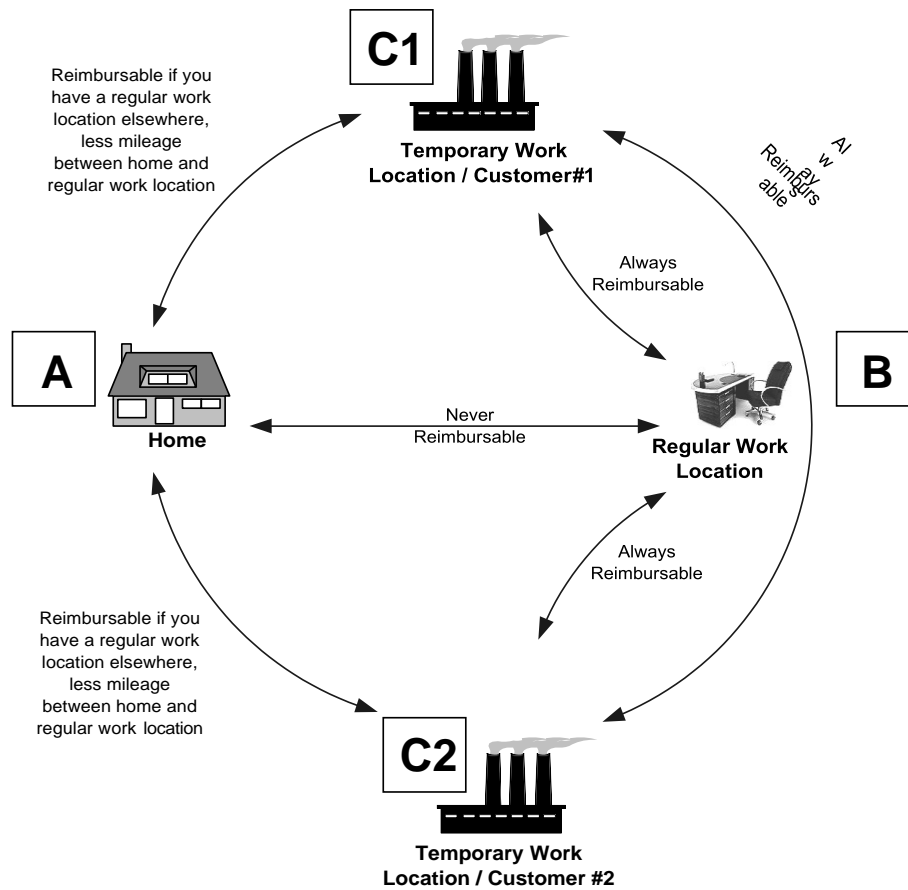
Expense reimbursement scenarios:

- Between home (A) and regular work location (B), whether by car or bus, is never reimbursable.

- Between home (A) and temporary work location/customer (C1 or C2), if you have a regular work location elsewhere, is reimbursable less mileage between home and regular work location. If the normal one-way commute (A to B) is 10 miles and the mileage to the temporary work location (A to C1) is 15 miles, then 5 miles are reimbursable.

- Between regular work location (B) and temporary work location/customer (C1 or C2) is always reimbursable.
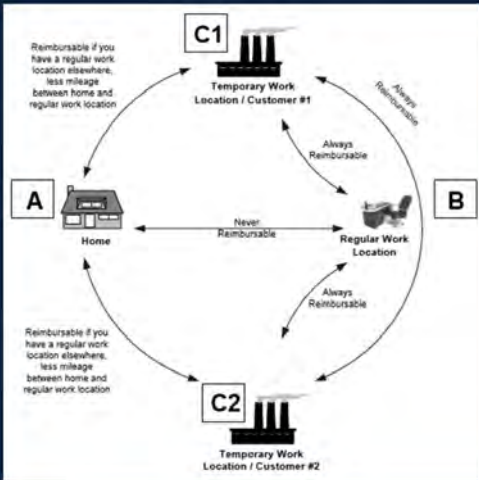
- Between two or more temporary work locations/customers (C1 and C2) is always reimbursable.

Definitions:

Home	The place where you reside. Transportation expenses between your home and your main or regular work location(s) are personal commuting expenses.
Regular work location(s)	Your principal place(s) of business.

Temporary work location	This is not your regular work location, but another company or off-site location to which you travel to perform work-related activities or to attend meetings or events. Travel to this location is for a year or less.

All of the above rules apply on weekends. Therefore, mileage incurred from home (A) to regular work location (B) on the weekend is not reimbursable.

Vehicle Rental
Employees should rent vehicles only when other transportation is more costly or impractical. Mass transit is available in many cities and may be a less expensive and more efficient mode of transportation than a rental vehicle. Likewise, taxis, ride-sharing services (Uber, Lyft) or hotel shuttles may eliminate the need for rental vehicles if additional ground travel is not expected during the trip. In some cases, a limousine service may be more economical or feasible, depending on the employee's final destination. The employee should make all efforts to be flexible and to select the lowest cost option that is reasonably convenient and that does not compromise personal safety.

Xcel Energy has contract rates with specific rental car vendors and limousine providers. Employees are required to use the Travel Management Company's online booking tool when making car rental arrangements to take advantage of negotiated financial benefits. Frequent rental car membership enrollment is available online by accessing the preferred car program through the Travel Management Company.

Rental vehicle size should be requested based on business needs. Intermediate sized cars are standard.

Insurance
Employees should not accept additional vehicle insurance for rentals in the United States. The Xcel Energy self-insurance policy and the bank issuing the corporate credit card provide this coverage. When renting a vehicle outside the United States for business, employees should purchase the liability and physical damage insurance coverage.

If the employee rents a vehicle for both business and non-business travel during the same rental period, they may wish to purchase the additional insurance coverage for the non-business portion of the trip. Employees will not be reimbursed for this expense.

Employees must have personal insurance on their personal vehicle, carried at the minimum level designated by the state where the vehicle is registered, if the personal vehicle is used for company business.

Fuel
Rental vehicles should be refueled before return to avoid high fuel costs, unless it is a greater cost benefit to refuel at the rental company. If it is known ahead of time that refueling will not be possible and considerable driving is expected, an alternative might be to purchase the gas from the car rental company at time of rental pick-up. Advance purchase of the full tank is generally at local gas station rates.

Company Vehicles
Although fleet vehicles may be checked out for shorter travel, business travel of more than 50 miles per day should be conducted in a company pool car, where available, to minimize costs. Refer to the Fleet Department website for related information. Contact the Fleet Department to arrange assignment of a pool vehicle or to add another vehicle to the pool at a specific location.

Refer to the Company Vehicle Assignment and Use Policy (10.3) for details.

Vehicle Accidents
Rental Car Accidents
If an accident occurs while driving a rental vehicle for business, the employee should first handle injuries (such as calling police and medical assistance) and take precautions at the accident scene to minimize harm to

others and then ensure that a police report is filed. A copy of the police report and/or the case number is required by the rental car company and should be obtained for Xcel Energy. The employee also should record all pertinent information about the accident, including other drivers' names, addresses, telephone numbers, insurance carriers and make of cars. The employee should also report the accident to their leader. On return from the business trip, the employee should promptly initiate claim procedures with the corporate credit card provider by calling the number on the back of the card.

Company Vehicle Accidents

If an accident occurs while you are driving a company vehicle, the employee should first handle injuries (calling police and medical assistance) and take precautions at the accident scene to minimize harm to others and then ensure that a police report is filed. A copy of the police report and/or the case number should be obtained for Xcel Energy. The employee also should record all pertinent information about the accident, including other drivers' names, addresses, telephone numbers, insurance carriers and make of cars. The employee should contact the Security Operations Center (SOC), report the accident to Xcel Energy management and complete and send the Initial Report of Motor Vehicle Incident/Damage form to the Claims Department and Fleet Department using the contact information included on the form. For additional information on the reporting guidelines for accidents in a company vehicle, see the Company Vehicle Assignment and Use Policy (10.3).

Personal Vehicle Accidents

If an accident occurs while you are driving a personal vehicle for company business, the employee should promptly initiate claim procedures with their own insurance provider. The employee should also report the accident to their leader.

Vehicle Parking

The lowest-cost alternative should be selected for parking associated with business-related events, including airport parking.

Parking for a business-related activity is reimbursable only if the amount incurred is from:

- A location other than the employee's normal work location

- The employee's normal work location and the parking expense were incurred after the employee paid the initial parking fee. For example, if the employee paid $10 to park at their normal work location, that $10 is not reimbursable. If the employee left their normal work location for business at another location and paid another $10 to return to their normal work location, only the second $10 parking fee would be reimbursable. Efforts should be made to minimize this type of parking expense.

The following parking expenses are not reimbursable:
- Monthly parking or a portion of monthly parking if incurred at normal work location

- Weekend parking if incurred at normal work location

- Parking tickets or expenses associated with towing a vehicle

Bargaining Unit Per Diems

A per diem is a daily allowance given to bargaining unit employees to cover expenses related to meals and/or business travel, as opposed to a reimbursement of actual expenses. Depending on certain circumstances, a per diem payment can be either taxable or non-taxable and must be reported on an employee's W-2 Form in either case. In order to facilitate proper tracking and reporting, all per diem payments need to be processed through the time entry system. Per diems may not be entered in the Expense Management System.

Employee Recognition

XCelebrate Recognition

Employee recognition should be awarded using our XCelebrate tool. Gift card purchases for employee recognition outside of this program are prohibited. Contractors are not eligible for the XCelebrate program. For more information related to employee recognition or specific events, please contact employeerecognition@xcelenergy.com.

Safety Recognition

Safety recognition is addressed through the safety program.

Other Recognition

Additional opportunities are available to recognize one or more benefited employee for work-related accomplishments and/or engagement. Expenses are charged to business area budget, should be paid for using a corporate credit card and must be submitted and reconciled through the Expense Management System.

Career Event	This includes food and/or a gift provided to acknowledge career-related achievements, including receiving certification, years of service, retirement, graduation or promotion.
Life Event Gifts	A Life Event is defined as funeral, major medical situation or the birth or adoption of a child and should be limited to benefited employees and immediate family members.
Recognition-Employee Engagement	This includes employee engagement and team building activities such as plant tours, and incentives/campaigns based on specific department goals, meals, awards and other associated expenses. Meals and other costs related to these events should also be expensed as employee engagement. If non-employees are present, see the Entertainment Events and Meals section.
Recognition-Entertainment	This includes charges associated with any ticketed sporting event or other ticketed entertainment, as well as costs associated with recreational events (e.g., golfing, fishing, resort activities, etc.). Meals and other costs related to these events are also considered recognition entertainment. If non-employees are present, see the Entertainment Events and Meals section.

Gifts for career and life events should not exceed $70 per qualifying event and should be limited to employees only. Meal expenses must follow the per meal and per day maximum guidance. See the Meals and Entertainment section for the recommended per meal guidance and maximum reimbursement. Additional expenses are subject to area vice president, director or manager discretion and budget constraints. Expenses need to be reasonable in amount, have a business purpose and comply with the Code of Conduct.

Employees are encouraged to recognize other events, such as graduations, birthdays, weddings and showers, during breaks and/or lunch hours with business area approval. The company will not reimburse associated expenses such as gifts or catering. Gifts not specifically mentioned in this Policy, given from one employee to another employee, are not reimbursable.

Club or Organization Dues

Employees should seek prior approval by their appropriate business unit vice president or higher for reimbursement of charges associated with club or organization dues and account for these expenses in the appropriate type of cost and expense type.

At the discretion of the CEO, full or partial reimbursement of capital assessments associated with country club memberships or other social organizations may be permitted. Generally, such reimbursement authorization will be afforded only to Xcel Energy board-appointed officers, based on sound business-related rationale and will require a separate type of cost and expense type.

Contributions to Candidates for Office and Elected or Appointed Public Officials
See Policy 3.8, Political Contributions, Lobbying and Government Communications.

Mobile Devices
Xcel Energy business conducted through a mobile device must be done in a secure manner to reduce information security risks that can result in a negative impact on the company. Storing any Company information on a public, cloud-based platform (such as iCloud) is a violation of the Information Management and Protection policy (3.7). If additional storage is needed, employees must submit a request for a site collection here.

Xcel Energy permits two types of reimbursable accounts for mobile devices: Corporate Responsible Account and Personal Responsible Account.

Corporate Responsible Account
A Corporate Responsible Account is in the name of Xcel Energy and Xcel Energy bears payment responsibility to the communication service provider.

Corporate Responsible Accounts may only be used by:
- Bargaining unit employees
- Non-bargaining employees that share mobile devices or pooled-minute plans with other employees

Personal Responsible Account

A Personal Responsible Account is in an employee's name and the employee bears payment responsibility to the communication service provider using personal funds. Employees can use a mobile device to conduct company business under a Personal Responsible Account if the employee:
- Is required to be on-call after normal working hours
- Works in the field or a plant location and it is necessary to be in communication with other employees
- Works in a corporate office but frequently travels and it is necessary to be in communication with other employees
- Is in a leadership role and it is advantageous to Xcel Energy to conduct business when not in the office

The acquisition of, use of and reimbursement of charges associated with mobile devices must be in accordance with the Mobile Device Standard.

Xcel Energy has negotiated discounts with several communications service providers that apply to both Corporate Responsible Accounts and Personal Responsible Accounts. The corporate negotiated discounts are available to all employees, including use that is intended for personal purposes only, and employees are encouraged to take advantage
of corporate discounts and special promotions.

Personal Protective Equipment
For bargaining employees, reimbursement should comply with the collective bargaining agreement. For non-bargaining employees, reimbursement should comply with the Personal Protective and Safety Equipment policy, 12.1.170. Non-bargaining employees must document the frequency of Personal Protective Equipment

purchases in the Expense Management System Description section if the amount is higher than the per-year allowance.

Policy Exceptions

Request for exceptions to this Policy must be made using the Corporate Credit Card Limit Increase Request form and outline each aspect of the event that is an exception to this Policy for which approval is being requested. Approval will be granted by the employee's department leader and the Director Governance and Enablement, Supply Chain through the Corporate Credit Card Limit Increase workflow.

Consequences of Noncompliance

Any employee, regardless of position or title, who violates any provision of this policy, may be subject to discipline, up to and including termination of employment. Contractor violations may result in removal of assignment at Xcel Energy.

Reporting and Protection from Retaliation

We encourage individuals to speak up without fear of retaliation when they see or suspect policy violations. There are several reporting options available. Retaliation is prohibited and will not be tolerated at Xcel Energy. Please refer to Xcel Energy Anti-Retaliation Policy (9.23).

Definitions

Corporate Responsible Account	The type of account for purchasing Mobile Data Services, Mobile Voice Services and/or Mobile Devices that is in the name of Xcel Energy and for which Xcel Energy bears payment responsibility to the communication service provider.
Employee	Legal definition of an employee, not a person who is contracted through an outside agency to perform work for Xcel Energy.
Executive Committee	The CEO and members of his or her Executive Committee
Expense Management System	The expense reporting system the company uses to reconcile employee expenses. It includes all corporate credit card transactions for travel, purchase and approved cash out-of-pocket expenses.

Leader	An employee who supervises other employees (including supervisors, managers, directors, vice presidents and executive officers).
Meal	Food, non-alcoholic beverages, alcoholic beverages and associated taxes and tips.
Mobile Data Service	Services purchased from a communications service provider that provides Internet access and e-mail/calendar access which are accessible through a Mobile Device.
Mobile Device	Consumer-level Mobile Device such as smart phones (including BlackBerries, iPhones and Android phones), tablets (such as iPads and Android devices) and PDAs.
Mobile Eligible User	An employee using Mobile Data Services and/or Mobile Voice Services that is authorized to either 1) use a Corporate Responsible Account or 2) submit reimbursement requests for a Personal Responsible Account.
Mobile Voice Service	Services purchased from a communications service provider that provides telephone service and which are accessible through a Mobile Device.
Per Diem	A daily allowance given to bargaining employees to cover expenses related to meals and/or business travel, as opposed to a reimbursement of actual expenses.
Personal Responsible Account	The type of account for acquiring Mobile Data Services, Mobile Voice Services and/or Mobile Devices that is in the employee's name and for which the employee bears payment responsibility to the communication service provider.
Proper Documentation	An original or official paper, such as a detailed itemized receipt or invoice, showing all items purchased and/or an explanation containing relevant details for expenses incurred that are not self-evident, signed by both employee and approving leader.
Proxy	An employee who creates and submits and/or approves expense reports on behalf of another employee.
Staff Augmentation Contractor	A person supplementing the company's work force who is employed by a staffing agency. The person is an employee of the contracted agency and receives wages or salary and benefits from that employer and not Xcel Energy. Xcel Energy pays the agency based on the contracted terms and conditions for the person's services. The use of 'Staff Augmentation Contractor' is synonymous with 'contingent workers or contract workers.'
Travel Management Company	Contracted travel provider utilized for commercial airfare, rental cars and hotel reservations when planning travel.
Type of Cost	An accounting classification used to categorize costs by separate object accounts. This categorization drives internal reporting and external financial statement presentation.
Xcel Energy	Xcel Energy Inc., its subsidiaries and affiliates. The use of "we," "ours" or "the company" is synonymous with Xcel Energy.

References
Code of Conduct
Alcohol and Drug-free Workplace policy (9.3)
Company Vehicle Assignment and Use policy (10.3) Mobile Device Standard
Personal Protective & Safety Equipment Policy (12.1.170)
Buying Matrix
XCelebrate website

History of Revisions
December 20, 2022
      Policy Effective Date – 1/1/2023
June 1, 2022
March 15, 2021
February 28, 2020
January 2, 2020
December 17, 2016
December 9, 2015
December 19, 2013
March 18, 2013
October 5, 2012
May 4, 2011
January 21, 2011
June 9, 2010
February 5, 2010
August 19, 2009
March 6, 2009

Approval
This Policy was approved by the EVP, Chief Legal & Compliance Officer and the SVP, Chief Audit and Financial Services Officer.

**Xcel Energy Corporate Policy Changes –
Travel and Employee Expense Reimbursement (Policy 10.2)
Changes Since November 1, 2021**

Since the filing of the most recent gas rate case on November 1, 2021 (Docket No. G002/GR-21-678), the Company has made changes to the Employee Expense Policy in June 2022 and December 2022. The June 2022 revisions included: increasing the daily spending limit from $65 to $75 per day for meal expenses, updating the international travel section, and clarifying that operational/informational technology should not be purchased using the OneCard. The December 2022 revisions did not include any material changes.

Date	Summary of Content Changes	Reasons for the Changes
06/01/2022	- Revised some language and terminology for consistency. - Clarified that operational/informational technology should not be purchased using the corporate credit card. - Added a 30-day timeframe for submitting reimbursement requests. - Added new requirements for reinstating a suspended credit card. - Increased the daily spending limit from $65 to $75 per day for meal expenses to reflect cost increases due inflation. - Clarified the necessary sub expense types for itemizing tips and gratuities. - Added a requirement to use the online booking tool to arrange car rentals. - Included additional consultation requirements for international travel to address current security risks, depending on destination. - Added details on safeguarding Company assets while traveling abroad.	- Improve consistency in terminology used. - Clarify language to ensure that the Employee Expenses Policy is easily understood by all employees. - Increase employee understanding on eligible business expenses and expense reporting.

Xcel Energy Corporate Policy Changes –
Travel and Employee Expense Reimbursement (Policy 10.2)
Changes Since November 1, 2021

12/20/ 2022	- References to OneCard and Corporate Card Admin team were replaced with current terminology. - Daily and monthly maximum credit card limit amounts were removed from the policy to a separate document maintained by Supply Chain, with a link provided in the policy. - Gender specific pronouns were replaced with gender neutral terms. - The requirement to contact the legal team before international travel was removed as redundant.	Improve consistency in terminology, update language to reflect diversity and inclusion.

Employee Expense Commitments

The Company's two most recent Minnesota natural gas rate rate cases were filed in 2009 (Docket No. G002/GR-09-1153) and in 2021 (Docket No. G002/GR-21-678). Between these two cases, the Minnesota Statutes § 216B.16, subd. 17 (Employee Expense Statute) was implemented, the Minnesota Public Utilities Commission issued Orders in electric rate cases that contain direction for employee expenses, and the Company made commitments in electric rate cases regarding employee expenses. We believe all these requirements and commitments apply equally to a gas rate case and accordingly provide a list of commitments below, upated to also reflect the Commission's Ordrer in the Company's most recent electric rate case E002/GR-21-630.

Source	Commitment	Where Addressed in TY 2024 Rate Case
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Provide direct testimony in future rate cases which explains all employee expense data in the Company's technical systems.	Bhosale Direct, Section III, Employee Expense Reporting, and Bhosale Direct, Section V, Employee Expense Review and Development of EER Schedules, discuss employee expense data in SumTotal, SAP, and TIME applications. EER Schedules 10 and 11 provide a summary of employee expenses processed in systems other than SumTotal.
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Provide direct testimony in future rate cases which explains the process used by the Company to create the EER Schedules, including any limitations.	Bhosale Direct, Section V, Employee Expense Review and Development of EER Schedules, discusses the process used to develop the EER Schedules and limitations of this process. Bhosale Direct, Schedule 8 provides the details of the process used to develop the EER Schedules.

Source	Commitment	Where Addressed in TY 2024 Rate Case
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Provide direct testimony in future rate cases which explains the types of employee expenses the Company is not seeking to recover in rates.	Bhosale Direct, Section V, Employee Expense Review and Development of EER Schedules, describes the types of transactions that the Company is not seeking to recover in rates. This Section also describes what expenses are included in the Employee Expense Adjustment. Bhosale Direct, Schedule 8 provides process details for what is included in and excluded from the EER Schedules as well as the development of the Employee Expense Adjustment.
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Provide direct testimony in future rate cases which explains the progress made to improve the reporting of employee expenses and compliance with the Employee Expense Policy.	Bhosale Direct, Section III A, SumTotal, discusses SumTotal characteristics and training. Bhosale Direct, Section III C, Internal Controls and Monitoring, describes how the Company is monitoring compliance with the Employee Expense Policy and appropriate reporting of employee expenses.
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Provide direct testimony in future rate cases which explains the findings of any recent internal audits regarding employee expenses.	Bhosale Direct, Section III C, Internal Controls and Monitoring, discusses the Company's most recent completed 2021 internal audit of employee expense reporting.
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Provide EER Schedules in a manner that facilitates review and quantification of categories.	EER Schedules are provided in Volume 3, Required Information, Section IV Other Required Information, Tab 2. Concurrent with this rate case filing, we are providing the OAG and the Department of Commerce live Excel spreadsheets of the EER Schedules to facilitate their review.

Source	Commitment	Where Addressed in TY 2024 Rate Case
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Update the OAG and the Department of Commerce of changes the Company intends to make to the Employee Expense Policy, employee expense reporting systems, or other changes that will affect the Company's future reporting under the Expense Statute.	Since we implemented the significantly revised Employee Expense Policy and SumTotal in October 2012, there have not been major plans to change the Policy or employee expense reporting systems. Bhosale Direct, Section III A, SumTotal, discusses current SumTotal features and any planned improvements. Bhosale Direct, Schedule 2 provides the current Employee Expense Policy and Schedule 3 presents a summary of changes made since the filing of the most recent natural gas rate case (Docket No. G002/GR-21-678).
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Meet with the OAG prior to filing future rate cases to discuss how to streamline regulatory review of employee expenses.	In September 2023, offered to meet with the OAG and stated that the Company intended to report employee expenses in same manner as in previous cases; OAG responded that if so, no meeting was needed.
February 22, 2012 ALJ Findings of Fact (GR-10-971)	Include a report of the total compensation for employees engaged in lobbying, with an explanation of the costs included and excluded in the rate request.	Bhosale Direct, Section VIII, Compliance Item on Lobbying Compensation, discusses compensation for employees engaged in lobbying. The total compensation for employees engaged in lobbying, with an explanation of the costs included in and excluded from the rate request, is provided in Volume 3, Required Information, Section IV Other Required Information, Tab 3.

Source	Commitment	Where Addressed in TY 2024 Rate Case
June 20, 2012 Meeting with OAG	Provide direct testimony describing how we will implement SumTotal, including safeguards which are in place so no bulk information is missing, whether all fields will map similar to Concur, and whether we will have problems updating data.	SumTotal has been in place since October 2012, and the Company has discussed its roll out and initial implementation in several prior electric rate cases. Bhosale Direct, Section III A, SumTotal, discusses the characteristics of SumTotal.
June 20, 2012 Meeting with OAG	Provide direct testimony describing how we will preserve data from Concur after SumTotal is in place.	While we have preserved old Concur data (prior to October 2012 implementation of SumTotal), it was not used for preparing this rate case.
June 20, 2012 Meeting with OAG	Provide direct testimony comparing budget to actual data and trending data for employee expenses.	Bhosale Direct, Section IV, Employee Expense Amount, Employee Expense Adjustment, and EER Schedules, provides 2020-2022 budget to actual data and trending data for employee expenses.

Bhosale Direct, Schedule 6 provides the budgeted and actual employee expense data by expense category for 2020-2022. |
| June 20, 2012 Meeting with OAG | Provide direct testimony describing whether Concur has been used increasingly to track employee expenses and whether other Company systems are processing fewer employee expense transactions as a result. | Bhosale Direct, Section III B, Other Systems, discusses employee expenses in systems other than SumTotal, which replaced Concur in October 2012.

EER Schedules 10 and 11 provide a summary of employee expenses processed in other systems than SumTotal. |

Source	Commitment	Where Addressed in TY 2024 Rate Case
June 20, 2012 Meeting with OAG	Provide direct testimony addressing improvements made in reporting to show compliance.	Bhosale Direct, Section III A, SumTotal, discusses SumTotal features. Bhosale Direct, Section III C, Internal Controls and Monitoring, describes how the Company is monitoring compliance with the Employee Expense Policy and appropriate reporting of employee expenses.
June 20, 2012 Meeting with OAG	Provide direct testimony regarding training to address entry of meal expenses in SumTotal.	Bhosale Direct, Section III A, SumTotal, discusses SumTotal training and other resources provided to our employees to accurately document and approve employee expense transactions in SumTotal. Bhosale Direct, Schedules 5A, 5B, and 5C provide copies of SumTotal training materials and job aid manuals, which also address entry of meal expenses.
June 20, 2012 Meeting with OAG	Provide direct testimony regarding how recognition issues (including gift cards) are handled.	Bhosale Direct, Section V B, Details Regarding EER Schedules, discusses employee recognition expenses.
June 20, 2012 Meeting with OAG	Prior to the next rate case filing, check with the OAG to confirm best way to present EER Schedules.	Offered to meet with the OAG, which responded no meeting was necessary, as set forth above.
June 20, 2012 Meeting with OAG	EER Schedules to contain the gross amount as well as the NSPM company amount.	Bhosale Direct, Schedule 8 provides details of the data and process used to develop the EER Schedules. The EER Schedules contain the gross amount as well as the NSPM company amount.

Source	Commitment	Where Addressed in TY 2024 Rate Case
September 3, 2013 Commission Order (GR-12-961), (superseded by the May 8, 2015 Commission Order, GR-13-868)	Provide flight data reports for the most recent 12-month operational period, including charged employee, each employee passenger and their assigned operating company, other passengers and their reason for use, and primary purpose for using the flight.	Bhosale Direct, Section II, Definition and Governance of Employee Expenses, states that the Company is not requesting recovery of any corporate aviation expenses in this rate case. This section also states that therefore we have not provided the flight log information.
September 3, 2013 Commission Order (GR-12-961)	Provide information for the calculation of the requested recovery amount of corporate aviation.	Bhosale Direct, Section II, Definition and Governance of Employee Expenses, states that although the Company is not requesting recovery of any corporate aviation costs in this rate case, EER Schedule 8 provides expense data related to corporate aviation to ensure completeness.
May 8, 2015 Commission Order (GR-13-868)	In future rate cases seeking recovery of corporate aviation, provide more detailed, accurate records of the actual business purpose for flights that are scheduled, rather than reducing all flights to a generic "code."	The Company is not requesting recovery of any aviation expenses in this rate case and consequently, is not providing more detailed records of the actual business purpose for flights.
July 17, 2023 Commission Order (GR-21-630)	Xcel must continue providing information mandated by Minn. Stat. § 216B.16, subd. 17, for all costs of dues it seeks to recover regardless of the type of membership (individual, corporate, or chamber).	Bhosale Direct, Section V B, Details Regarding EER Schedules, discusses Professional Association Dues incurred by individual employees for memberships in professional organizations in their respective fields. The required information for Professional Association Dues is included in EER Schedule 6. Bhosale Direct, Section VI, Organizational Dues – Corporate Dues and Chamber of Commerce Dues, discusses Organizational Dues, which are dues paid by the Company to various utility associations and to Chambers of Commerce. The required information for Organizational Dues is included in Volume 4, Workpapers, 2 of 3, VIII A2 and VIII A4.

The Travel and Expense Policy: Appropriate Use of Your Corporate Credit Card
(LPN L0042C-220)

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policy topics

Click each box next to the topic on the right to learn more.

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- [✓] New Credit Card Changes / Merchant Category Codes
- [ ] Appropriate Use of Corporate Credit Card
- [ ] Commercial Air Travel, Hotel and Rental Vehicles
- [ ] Approved Parking and Mileage Expenses
- [ ] Meal and Tip Limits
- [ ] Other Approved Employee Expenses
- [ ] Required Receipts
- [ ] Expense Filing Requirements

The Travel and Expense Policy: Appropriate Use of Your Corporate Credit Card

merchant category codes

Visa uses default merchant category codes (MCC) to classify merchants and businesses by the type of goods and services provided.

Merchant category codes are used to categorize, track and restrict transactions. Selected merchant category codes will be blocked for Xcel Energy employees, preventing employees from making certain purchases.

Click the button below to view a list of travel and expense related merchant category codes associated with Xcel Energy's Credit Card.

OPEN CATEGORY CODES

Proactively plan purchases to avoid declines. For guidance see here. If your card gets declined when making a purchase, call the Supply Chain Hotline at 303-628-2644 and select option 1. You can also complete a get assistance ticket here. Blocked purchases must not be made with cash or personal card. Employees will need to seek business area and Supply Chain approval to unblock merchant category codes by submitting a Permanent or One Time Authorization request form here.

list of open merchant category codes

- Airlines
- Hotels, Motels and Lodging
- Car Rentals
- Transportation
  (railways, bus, taxi, Uber/Lyft, bridges, tolls, parking)
- Fuel
- Meals
  (restaurants, groceries, bakeries, caterers)
- Entertainment
  (sporting camps, bowling alleys, tourist attractions, etc.)

Create an account with US Bank Access Online to receive alerts for potential fraud, account activity and purchases

Click here to view a list of MCCs on the Travel and Expense SharePoint site

The Travel and Expense Policy: Appropriate Use of Your Corporate Credit Card

TRUE OR FALSE QUESTION

When using your personal vehicle, Xcel Energy will reimburse for all miles traveled when the travel is from your home to a temporary work location?

- True
- False

The Travel and Expense Policy: Appropriate Use of Your Corporate Credit Card

MULTIPLE CHOICE QUESTION

If you're working from home for pandemic or other telecommuting reasons and you have to travel, you may expense:

- Your trip from your home to your assigned Xcel Energy business location (e.g. your normal commute).
- Miles that exceed your normal commute.
- You cannot expense any miles.

Xcel Energy® RESPONSIBLE BY NATURE™

Corporate OneCard Department

Procedure Name:	SumTotal Reconciliation— Creating and Submitting Expense Reports

Responsibility:

Primary:	Card Holders
Backup:	SumTotal Admins

Frequency / Due Date:	Monthly, Every 30 days

Summary / Background:

A detailed process of how to create and submit an expense report, for expenses incurred on the Corporate OneCard.

Required Tools and System Access:

(1) SumTotal
(2) XpressNet
(3)

Contacts:

Name	E-Mail Address	Phone Number	Department / Title
Supply Chain Hotline		303-628-2644, Option 1	Corp Card Department
Get Assistance Ticket	Supply Chain Get Assistance (Sharepoint.com)		Corp Card Department
Travel and Expense SharePoint Site	Travel and Expense - Home (sharepoint.com)		Corp Card Department

Date: 07/31/2023

High Level Process Summary

Specific Details

Detailed Process
Step One-- Log into SumTotal (2 ways to access SumTotal)

1. From **XpressNet**, click on **Expenses** from the Main Menu:
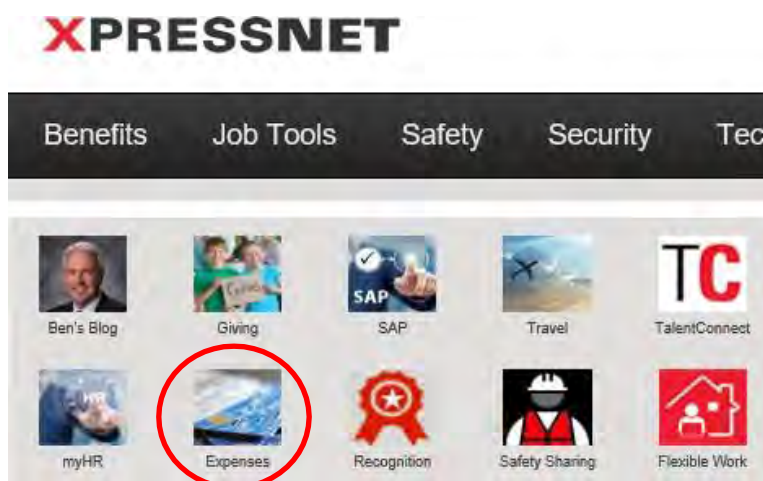
Or, from Travel and Expense SharePoint Site, click on **SumTotal**:
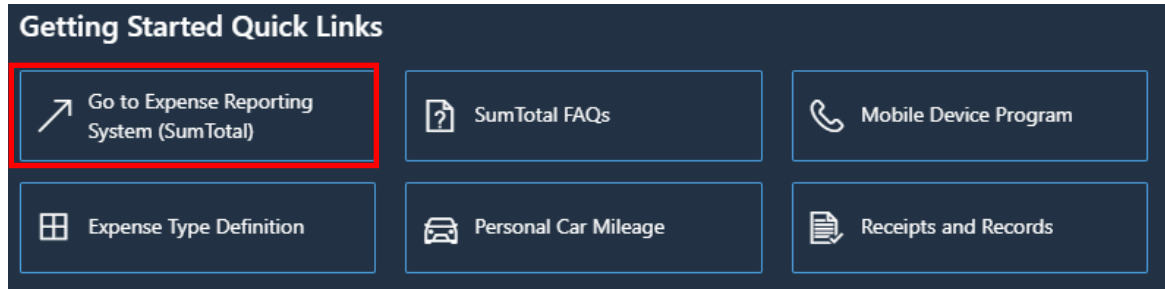
➢ SumTotal is a single sign-on application and will not require a separate login information.

2. SumTotal Home Page-
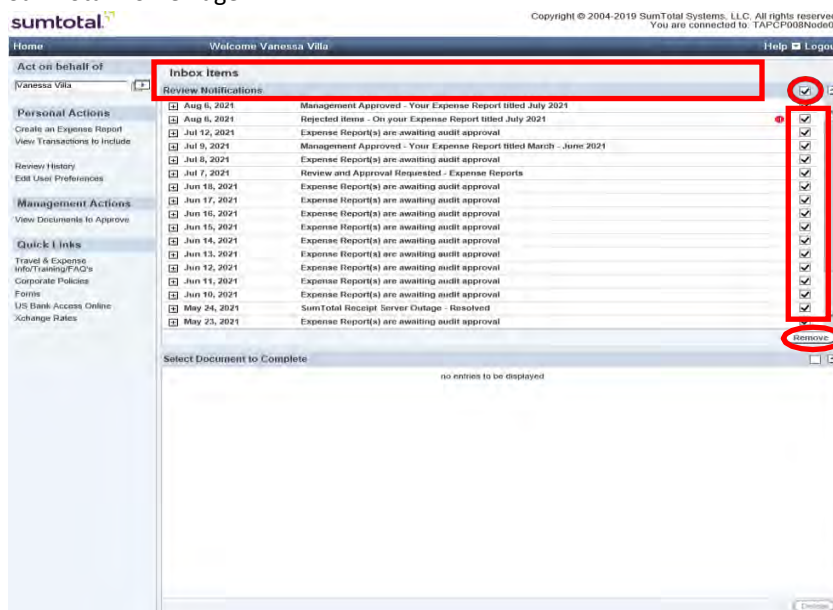
➢ To remove notifications, select the check box to the right of the notification, or to select all, click the check box on the title bar and click **Remove**.
➢ This will clear all the notifications.

Step Two- Create an Expense Report

1. Under the **Personal Actions** list, select **Create an Expense Report**.

➢ Employees will submit one expense report per month.
➢ Credit card transactions must be reconciled at least every 30 days. Pick a day to always complete your expense reports and do so every 30 days. A 15-day grace period exists before notifications will be sent regarding delinquency of transactions based upon transaction posting date. Day 46 spender and manager will receive delinquency notifications daily until the transaction is included in an expense report. 60-day delinquencies will cause card to be suspended and 90 days, card will be closed.
➢ **Example**: If the spender picks the 15th of each month to prepare expense report – on that expense report the spender should include all transactions prior to the 15th of that respective month to be included in the expense report. The spender will get a 15-day courtesy notice to complete an expense report based upon transaction date.
➢ Employees who are on Short Term Disability (STD) or Long-Term Disability (LTD) will not be able to use their Corporate OneCard. **Managers should notify Supply Chain Hotline to temporarily suspend card until further notice.**
➢ For more information on the policy please access the 10.2 Travel and Employee Expense Reimbursement.

Step Three- Create a Report Header

1. **Expense Report Header Screen**-
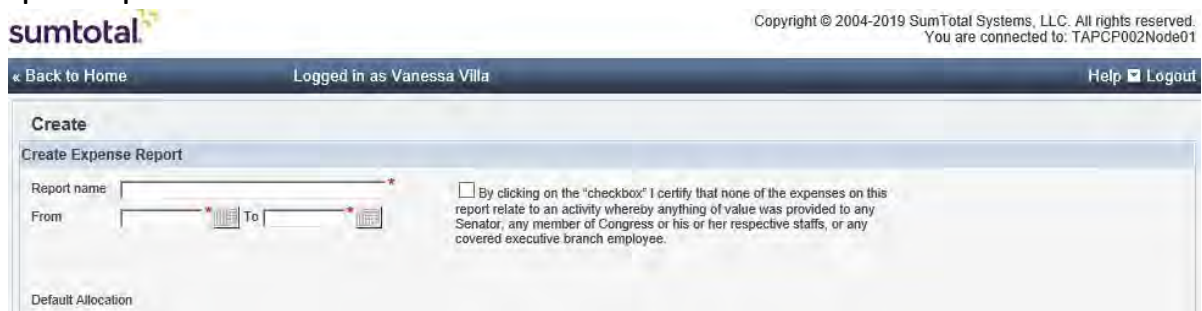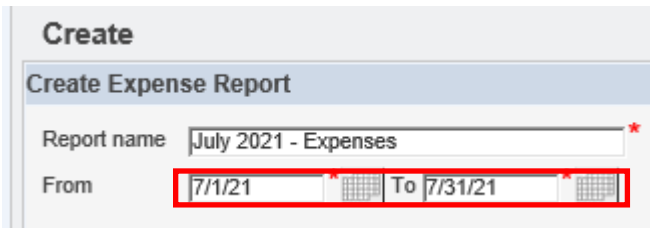
2. **Report Name**- Include Month/Year of expenses (i.e., July 2021 Expense Report). The name should be descriptive of time frame of expenses included in report.
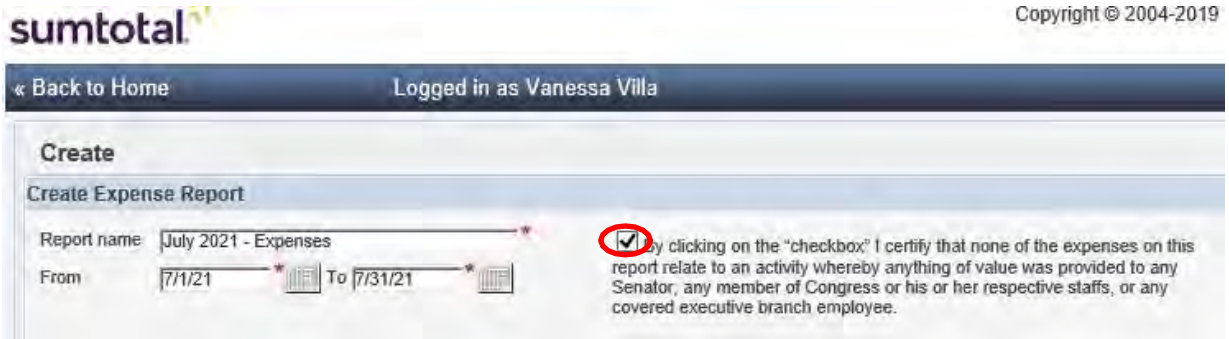
3. **From**- The first date will be the first date of expense items on your report and the second date will be the last date

of expense items. To select a date, click on the calendar icon and click on the specific date.
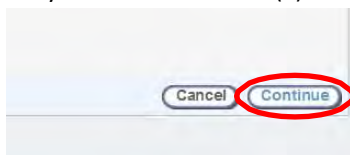
- ➢ If your expenses do not fall within that date range, it will flag the report as being not policy compliant and will route to audit after manager approval.
- ➢ Once the report has been submitted, the user cannot change the date range even if it has been rejected back to the employee.

4. **Certify Compliance**- Click the empty box next to the compliance message to check mark that you have read and understand the compliance message.

- ➢ Managers will reject expense report(s) if compliance checkbox is not checked.
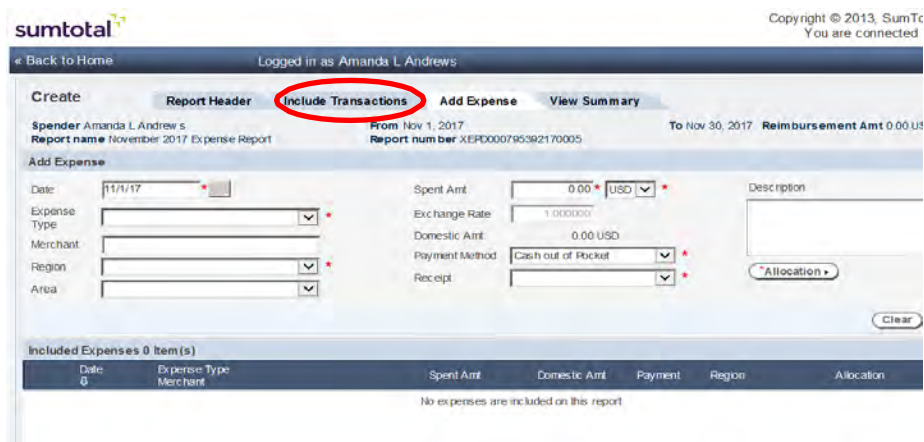
5. Verify all fields with a red (*****) are filled out completely and efficiently, and then click on the **Continue Button**.

- ➢ This will take the user to the Add Expenses Screen.

Step Four- Add Credit Card Transaction(s) to Expense Report

1. Click on the **Include Transactions** tab.

- ➢ If the expense(s) do not display in the include transactions tab, **do not go to the add expense tab and enter them as Cash out of Pocket.** All credit card transactions will be uploaded into the system within approx. 1-2

days of posting date.

2. A list of all credit card transactions to be included in an expense report will be displayed.

3. To add a **SINGLE** transaction to the expense report, click on the box next to the individual transaction in the list and then click on **Include**.

4. To add **ALL** of the transactions listed in the include transactions tab, click the check box on the title bar.

5. Once the transactions have been selected, click on the **Include** button towards the bottom right.

➢ If disputing fraudulent charge(s), contact US Bank directly to open a fraud case. After review, a credit may be issued to offset the fraudulent charge(s).

6. The selected transaction(s) have moved to the **Included Expenses** section on the **Edit Expense Report** in the **View Summary tab**.

➢ The **Red** icon to the left of expense indicates the expense is missing required information and will not allow you to submit until all information is entered.
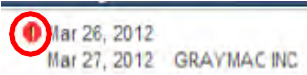
7. Double click on the expense item to edit.

8. System displays transaction information on the **Edit Expense View** pane.

9. Bank transaction information populated in gray (user **cannot** edit):
➢ **Date**-The Date the expense incurred from merchant.
➢ **Posting Date**-The Date that the transaction(s) are received from Visa.
➢ **Merchant** -The name of the merchant where the expense was incurred.
➢ **Spent Amt.**-Credit Card Transaction Amount.
➢ **Currency**- USD, SEK, CAD, etc.
➢ **Payment Method**-USB Visa Card, Cash Out of Pocket, etc.

10. Populate all fields including those which are required (*)
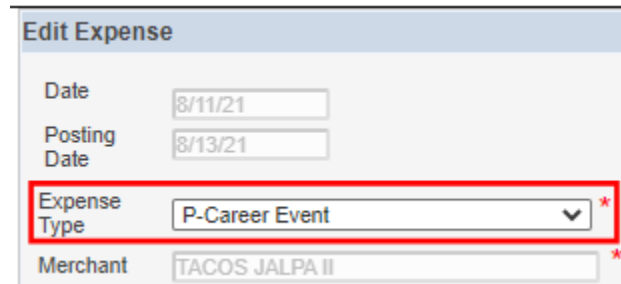
- **Expense Type**- Select the correct expense type from the drop-down options, refer to definitions posted on SharePoint for further guidance.
- **Region**- State where the expense was incurred.
- **Area**- City where the expense was incurred.
- **Receipt**- Select Not required, Receipt Included, Lost or VAT Receipt Included.

➢ Receipt field will default based on expense type selected. Per 10.2 Policy- Itemized Receipts are required for all expense type =>$25.

➢ Itemized receipts are required to substantiate expense reimbursements. An Itemized receipt details items and amounts, sales tax paid and total amount. The credit card slip that is signed for Visa is **NOT** an itemized receipt.

➢ Users can scan the credit card receipts along with the itemized receipt. However, both the Itemized receipt and credit card slip are required documentation.

➢ The credit card receipt indicating the tip amount and total amount is required along with the itemized receipt.

➢ Users and approving managers are required to ensure itemized receipts are provided with expense report(s). If receipt is lost, user is required to mark the Receipt field as "Lost" and fill out the "Lost Receipt Form", then scan and upload with expense report.
  - If you are using a Lost Receipt Form, it must contain the specific details of items purchased and totals just like the receipt would have and it must be on the current Lost Receipt Form only, any other version will be rejected.
  - Lost Receipt Forms are meant to be used occasionally and not on a regular basis. We are finding that during rate cases we have difficulty using the Lost Receipt Forms for justification.
  - Lost Receipt Forms will not be accepted for hotel expenses or invoiced expenses. The vendors must be contacted to provide a copy of the actual receipt.

➢ PII = Personal Identifiable Information- review the receipt if the full credit card number is legible, black out all but the last 4 digits prior to scanning. Also, if you owe money to Xcel Energy and you scan a check in, please make sure you black out the acct. number, routing number and address.

Step Five- Select Purchase Expense Type and Fill in Required Fields

Expense Type is a required field that defines the expense and what Type of expense was incurred.
  1- A complete list of all Expense Types with their scope and definitions can be found here
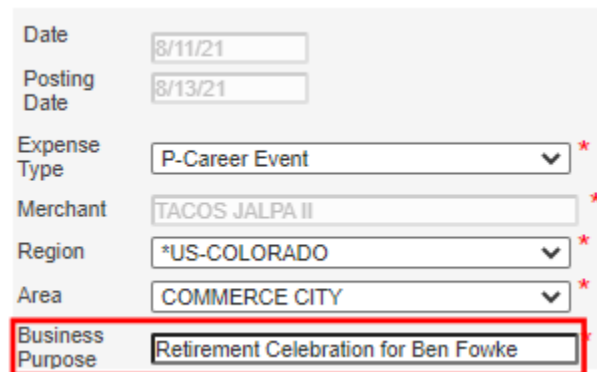
2-All Meal Type Expenses Require itemization using the Itemize tab at the line item level. This breaks out meal cost plus tax, gratuity and alcohol. Also add Nbr of Persons and Attendees if more than one person was included.
3-Hotel expenses require the itemized break down of Nightly Room Rate, Nightly Tax and any other additional charges such as Meal(must include itemized meal receipt) and Nightly Parking that were added to the hotel receipt at time of check out.
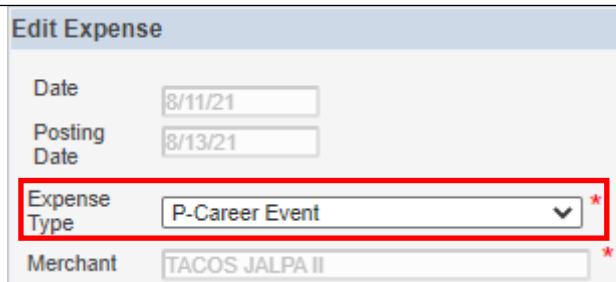
> The business purpose is a detailed description of the business reason for the expense item. It must specifically describe why the expense was incurred, not what the expense was. Do not use acronyms.

> Examples of acceptable Business Purpose:
  -Fork Lift Training Denver
  -SAP Training Denver
  -EEI (Edison Electric Institute)

> The Description field (box) can be used for further explanation for expense if required. With certain Expense Types Description is required and the system will prompt the user.

Edit Expense

Date	8/11/21
Posting Date	8/13/21
Expense Type	P-Career Event ▼ *
Merchant	TACOS JALPA II *

3. Enter Business Purpose
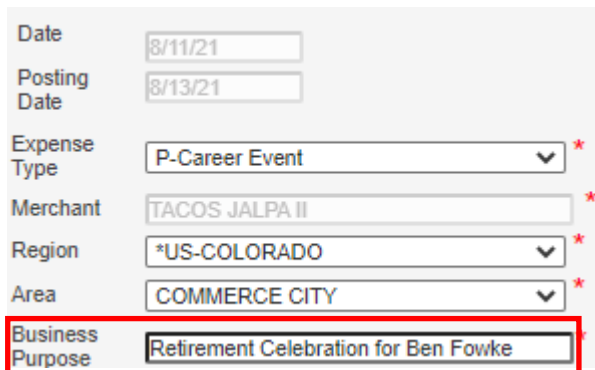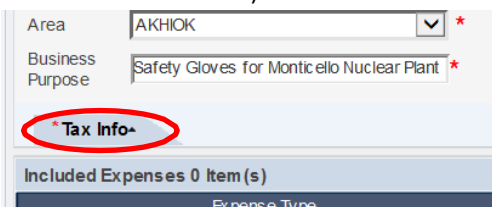
Date	8/11/21
Posting Date	8/13/21
Expense Type	P-Career Event ▼ *
Merchant	TACOS JALPA II *
Region	*US-COLORADO ▼ *
Area	COMMERCE CITY ▼ *
Business Purpose	Retirement Celebration for Ben Fowke *

➢ The business purpose is a detailed description of the business reason for the expense item. It must adequately describe why the expense was incurred, do not use acronyms. For example:

Examples- Fork Lift Training in Denver

SAP Users Training in Denver

➢ The Description field (box) can be used for further explanation for expense if required.

➢ When using expense types **Other Purchase** and **Other Travel** a description is required.

4. Click on **TAX INFO** tab to enter the sales tax information as they will **NOT** manually pull in. (this may be under Itemized in some cases)

Area	AKHIOK ▼ *
Business Purpose	Safety Gloves for Monticello Nuclear Plant *

* Tax Info▲

Included Expenses 0 Item(s)

Expense Type

Step Six- Enter Sales Tax for Purchase Expense Type

1. Merchants should charge tax on all credit card transactions. Sales tax will need to be manually entered by Cardholder:

Add Expense

Tax Info▼

Sales Tax Paid [Yes ▼] * Amt of Sales Tax Paid [4.16] * Facility Code [114 - Materials Distribution Center ▼] *

Clear   Add Expense

➢ **Sales Tax Paid**- Yes or No

➢ **Amt. of Sales Tax Paid**- this will be the amount of tax paid to vendor.

➢ **Facility Code**- Should automatically populate.

2. Click on **Sales Tax Paid** drop-down arrow and Select Yes if sales tax was paid **per receipt**.

Tax Info▾

Sales Tax Paid Yes ▼ *

3. Click in **Amt of Sales Tax Paid** to enter amount based on the itemized receipt.

Amt of Sales Tax Paid   4.16 *

4. Change Facility Code, if applicable.

➢ Facility Code defaults facility from user profile. Facility Code is used to identify where you took possession of item(s) purchased or expects to use. Select appropriate facility code if material was shipped/used at a location different than the users' facility.

➢ All facility codes are loaded. You may need to scroll down and/or select the **Next** button for additional facilities.

5. Some Expense Types that do not require tax are:

P-Charitable Contribution	P-Dues - Gas Utility Assoc	P-License/Fees/Permits
P-Civic & Political	P-Dues - Professional Assoc	P-Mail/ Frt/ Postage
P-Community Sponsorships	P-Dues - Social Service	P-Permits/Fees - Environ
P-Directors Fees	P-Dues - Utility Assoc	P-Permits-Temporary Cap Construction
P-Dues - Chamber of Commerce	P-Job Postings	P-Personal Communication-Service
P-Dues - Elect Utility Assoc	P-Lawn Care	

➢ Expense types that do not require tax will not have the tax tab.

6. If no sales tax was paid, click on the **Sales Tax Paid** drop-down arrow, and select no.

Tax Info▾
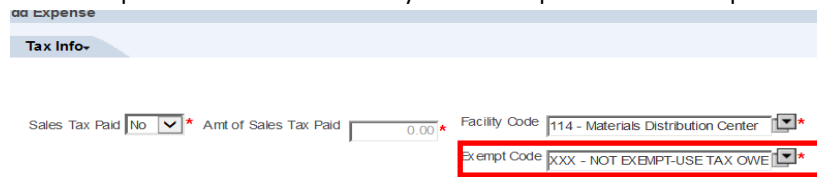
Sales Tax Paid No ▼ * Ar

7. The amount of sales tax will automatically be set at 0.00.

Amt of Sales Tax Paid   0 *

8. Change Facility Code, if applicable (see #4 above).

9. Select Exempt Code that describes why tax wasn't paid from the drop-down menu.
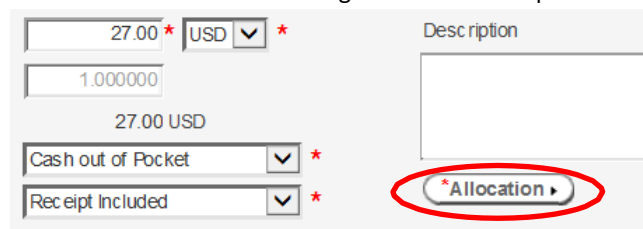
➢ If sales tax should have been paid but was not, select reason code "XXX-NOT EXEMPT-USE TAX OWED." This code informs the Tax Department to accrue and pay tax.

10. Click **TAX INFO** tab, a second time, to exit tax panel.

11. Once all tax information is added, allocate expense to the appropriate accounting.

12. Click **Allocation** button to navigate to Allocation pane.
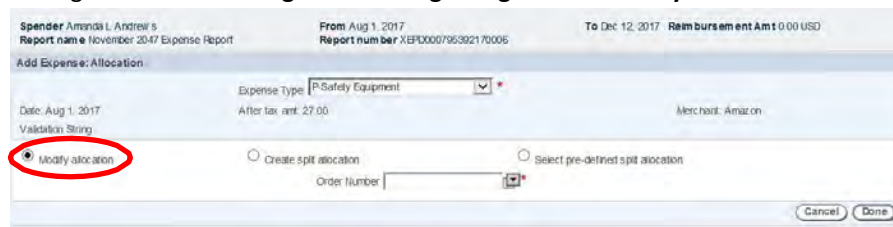
Step Seven- Allocate Expense to Single Accounting String
1. There are 3 ways to allocate an expense:
   ➢ **Allocate Single Acct**
   ➢ **Split Allocations**
   ➢ **Add Split Allocation to Preferences**
   ➢ **Pre-Define Split Allocation**

2. To begin allocation to **single accounting string** click on **Modify Allocation.**

3. Click on the drop-down arrow next to **Order Number**.

4. Either select the correct order number from the drop-down options or type in the order number in the search box and click search.

5. Click on the correct options and it will populate in the Order Number field.

  ➢ User can use wild card (*) to narrow search results. Enter first 2 or 3 digits of account segment (Business Unit, Sub ledger, etc.) and add (*) then click search.
  ➢ If IO number or allocation is unknown reach out to your manager.

6. Users have the ability to define and save split allocations to preferences.

7. Click on the **Create Split Allocation** radial.

8. Put in the percentage that you want to go to that **Allocation Order Number** in the percentage field.

9. Make sure your Order Number is correct for where you want this to be charged to, and then click on the **Add Split Item** button.

10. This will bring the **percentage** and the **Allocation amount** under the **Allocation Summary**.

11. To Save the formula to your preferences click on **Add Formula to Preferences.**

12. In this screen you will fill out all the fields with a red (*).

> ➢ **Name-** Name of the Preference
> ➢ **Start Date-** When you want this preference to start.
> ➢ **Order Number-** The Order number you want to charge to.

13. Once you have filled in all the required fields, click **done**.

14. **Pre-Defined Split Allocation Option** is a saved option that has been saved from a previous report.

15. To Delete Split Allocations; click on the box next to the specific split allocation that needs to be deleted.

16. Click on the **Delete** Button.

17. Click on the radial next to **Select Pre-Defined Split Allocation**.

18. There will be a drop-down field option that will populate.

19. Click on the drop-down arrow and select one of the pre-defined options to use.

20. This will automatically populate the percentages and the order numbers that need to be used.

21. After allocating click **Done**.

22. System returns to Expense View on Edit Expense panel.

23. Click the **Save Changes** button or all your information will be lost.

24. System displays **View Summary** tab with expense added to **Included Expenses** section.

25. Hover over the Green Diamond and it will say External Validation Successful.
    ➢ The system will perform the accounting validations and display a green icon and hover over message that states "External Validation Successful" at the expense report line level (main expense)

26. Click on the Save Report button to save report in draft status.
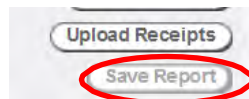
Step Eight- Scan and Upload Receipts

1. *PII = Personal Identifiable Information- review the receipt if the full credit card number is legible, black it out so that it cannot be seen prior to scanning or if a check is being uploaded to receipts. Black out the banking information at the bottom of the check.*

2. Receipts are reviewed during audits- ensure they are legible, and the correct receipts are loaded as these become a permanent record of each expense report.

3. Access the expense report from SumTotal home page.

4. Click on the report that you want to drill into and then it will take you to the '**View Summary**' screen.

5.   Click on **Upload Receipts.**

6.   The **Upload Receipts** screen will pop up.

7.   Click on the **Browse** Option.

8.   Find the document that you have scanned into your documents to upload. **Please keep in mind that the system will only allow you to upload 2MB per file.** If it's more than that you'll have to split them up.
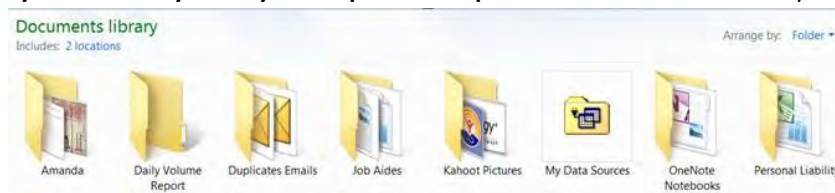
9.   Once the file has been located, click on **Open**.

10. This will bring the file name into the display.

➢ User can browse and upload multiple documents by continuing to click **Browse** button and selecting the applicable document to upload.

➢ Standard upload amount is 20 pages. If more than 20 then break down into two separate scanning groups

11. Click **Upload**.

12. User will get a "Successful" message, if the receipts were uploaded correctly:

13. This will upload the selected receipts to this specific expense report.
    ➢ If unsuccessful the system will advise that the files were not uploaded. Proceed to make the files smaller and upload more than one file.

Upload Receipts

The size of file Creating an expense report.pdf exceeds the 2MB limit.

Choose File(s) to Upload

14. Once the file is uploaded successfully, click **Return**.

15. This will bring the user back to the **View Summary** Screen.

16. User can view receipts by clicking on the **View Summary** Tab, and then clicking on **View Receipts**.

    ➢ It may take up to 5-10 minutes for the file to be viewed. If the receipts have not loaded into the report, please wait a moment, and try viewing them again.
    ➢ The corporate expense system will retain all records in accordance with the corporate record retention policy guidelines

Step Nine- Submit Expense Report

1. After receipts have been successfully scanned and uploaded to expense report, Click **Submit**.

➢ The system validates the accounting string at the time of submittal, once again to ensure the validation is still successful.

➢ Compliance message will appear for all reports submitted, sample message:

➢ I agree all expense items are business related, and all travel related purchases (Hotel, Air, Car) were booked within the Travel Management Company.

➢ Must select 'Yes' or leave a comment if 'No' is selected

➢ Users may receive warnings if there are additional transactions that are ready for inclusion. Select **Continue** if you don't want to add more transactions to your current expense report.

2. System will display a Confirmation window.
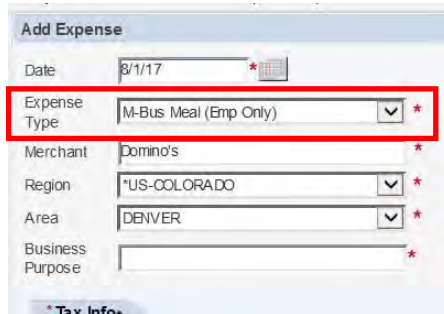
3. Click **OK** and then **Done**.

4. Expense report is now submitted for MA approval (Manager Approval).
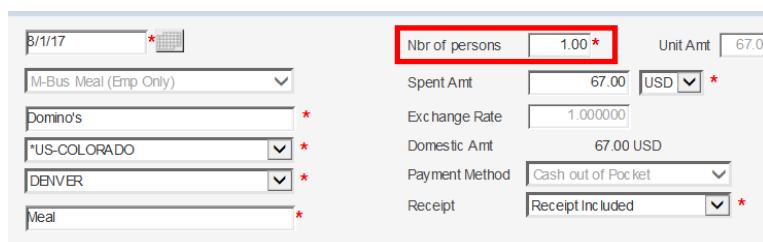
Specific Details

Add Meal Expense Type

1. Click on down arrow in Expense Type field and Select a Meal expense type (preceded by "M").

➢ There are 2 Business Meal Expense Types and 1 Travel Meal Expense Type.
  ➢ **Business Meal Employee Only**- This expense type is to be used if business cannot be reasonably conducted during regular business hours, and only Xcel Energy Employees are in attendance.
  ➢ **Business Meal Non-Employee**-This expense type is to be used if business cannot be reasonably conducted during regular business hours and there are guests. (Contractors, Interns, Business Partners, etc.) Even if there is only 1 guest, Business Meal Non-Employee needs to be used.
  ➢ **Travel Meal**- Travel Meals are generally for each individual while traveling on company business.

2. SumTotal will flag any non-compliant expenses based on 10.2 Employee Expense Reimbursement policy.

3. The expense will be flagged with a yellow icon to the left of an expense when Expense Type exceeds policy spend/cap:
  ➢ System will flag a meal type expense when total amount of all meals per day expensed by spender exceeds $75 Daily Meal Allowance.

4. Users will enter a business purpose for each expense added to an expense report.
  ➢ The Description field can be used for further explanation for expense, if required.

5. Enter the Number of Persons that attended the meal.

  ➢ Make sure that the number of persons matches how many attendees are listed in the attendee tab.
  ➢ Group meals that exceed 20 people require a sign-in sheet that outlines the group in attendance with names and relationships as supporting documentation.
  ➢ System will calculate **Unit Amt**. for each person.

6. Enter any other required information, if not populated.

7. Click on the **Tax Info** Tab.

8. Click on **Sales Tax Paid** drop-down arrow and select **Yes.**

9. Click in **Amt. of Sales Tax Paid** field, highlight the zeros and delete. Then enter amount of sales tax.

10. Click on **TAX INFO** tab to close tax screen.

11. To Allocate Expense Line, user can allocate at the expense level or at the expense line (sub expense) level.

12. Click the **Allocation** button to allocate the expense line.

13. System displays Add Expense: Allocation on Expense View screen.

14. There are 3 ways to allocate an expense: Please see **Step 7** for Allocation instructions.

15. When allocation is completed, click **Done**.

16. System returns to Edit Expense pane on Expense View screen.

17. Next, click the **Attendee** button.

Add Attendees from Global Xcel Employee List

1. System displays **Add Attendees** on **Expense View** screen.

➢ System defaults user as attendee.

2. Click **Add Attendee**.

3. Click on prompt arrow next to blank Attendee name field.

➢ If your attendee list is 20 and under you must enter them in the attendee tab. Group meals that exceed 20 people require a sign-in sheet that outlines the group in attendance with names and relationships as supporting documentation.

4. System displays global list of all employees.

➢ User can search by the Following Criteria:
  ➢ **Attendee Name**-Employees Name
  ➢ **CORP ID**-Employees ID
  ➢ **Company**
  ➢ **Change the Drop-down option to match what you are searching by**

5. Type in the search box the attendee information and click **Search**.

➢ This will bring up all Employees within that search criteria.

6. Select the Attendee by clicking in the check box next to the employee name.

7. Click **Add**.

> ➤ Repeat this process to add as many attendees as necessary until complete.

8. Click **Save and Return** once all the attendees have been added.

9. To Add Non-Employee Attendees, click on the add Attendee button.

10. Enter in Attendees Name.

11. Enter "XXX" in Corp ID Field.

12. Click **Business Relationship** drop-down arrow and select **Guest**.

13. In the **Company field** enter the company that they work for.

14. Click **Save and Return** if no Preferences needed.

15. Adding Attendees to Preferences creates a preferred list of attendees for easy selection on future expenses.

16. Select employee listed under **Add Attendees** by clicking check box to the right of name(s).

17. Click **Add to Preferences**.

   ➢ You can select all on list by clicking on the check box on header section of screen

18. System displays pop up window with message "Are you sure you want to create a new attendee entry in your list?"

19. Click **Yes**.

20. System saves selected employees to your Attendees-Preferences list.

21. Click **Save and Return.**

22. View Preferred Attendees list by Clicking **Add Attendee** and Click on prompt arrow next to Attendee Name field.

23. System displays preferred list of all employees added to Preferences by clicking on the drop-down arrow next to Show and select **Preferred**.

24. Select the Employees and add them to your attendee list.

25. Click **Save and Return** button.

Itemizing Expenses

1. Users are required to itemize all meal type expense(s).

2. Click on the **Itemize** Button.

> All Meal type expenses require itemization at line item level (sub expense) to identify meal vs. gratuity (not to exceed 25%), and any alcohol portion.

3. Meal vs. gratuity and/or alcohol portion must be identified when applicable and account for expenses appropriately.

4. System displays **Add Expense Item** on the **Expense Item View** panel.

5. **Spent Amount** will display from expense.

6. Click on down arrow in **Expense Type** field to display a list of Sub Expense types.

7. Select the Correct Meal Expense type- Business Meal Employee Only, Non-Employee or Travel Meal.

8. If amount is meal only – Enter entire amount in **Spent Amt**. field.

Date: 07/31/2023

9. Click on the **Allocation** button.

10. Refer to **Step 7** for Allocation process.

11. Once Allocation is complete, click **Add Item**.
    ➢ The system displays a "Grey" validation icon with a hover over message stating "Allocations haven't been externally validated" as the sub expenses have not been added to Included Items yet.

12. This will add the item to the Included Items Section.

13. Click on the **Return** Button.

14. Click on **Save Changes** button to save the information added to the expense.

15. If no validation errors occur, the system displays a green icon to the right of the expense line.

16. Click "+" to the left of expense to expand and view sub expense(s).

17. System will display a hover over message that states "External Validation Successful" at the expense report line (sub-expense)

18. Click on the **Save Report** button to save report in draft status.
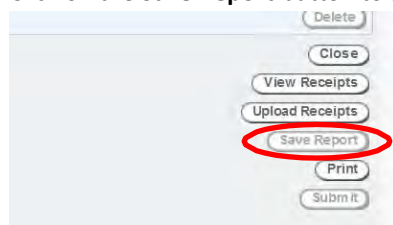
Editing/Viewing Attendee Preferences

1. To access your Attendee preferences, go to your Expenses Home Page.
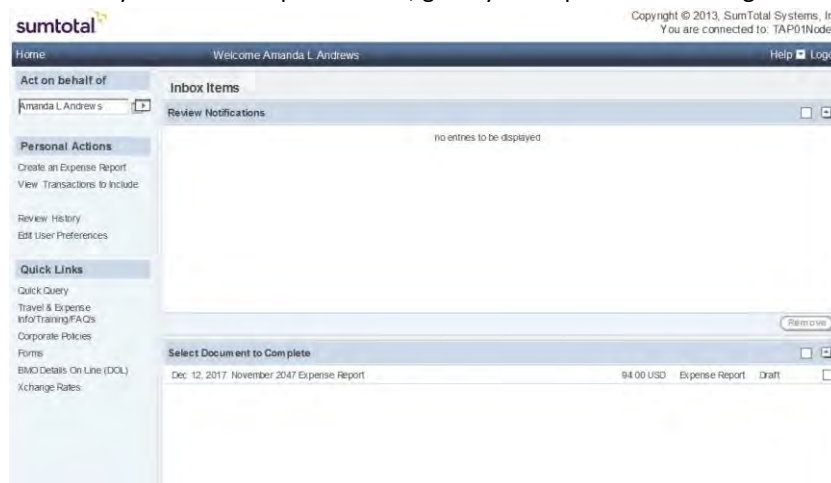
2. Click on **Edit User Preferences.**

3. Click on **Preferences** tab.

➢ System displays list of attendees added to preferences.
➢ User can add additional non-employees on this panel.

4. Click **Add Attendee** button.

5. Enter **Attendee Name**, **Title** and **Company**.

6. Select **Guest** from drop-down arrow of **Business Relationship** field.

7. Click **Save** button.

8. To Remove Attendees from the Preference Tab; click on checkbox next to attendee you wish to delete and click **Delete**.

➢ You can select all by clicking on the check box above the list.

9. System displays pop up window with message "Delete the selected attendee(s)?"
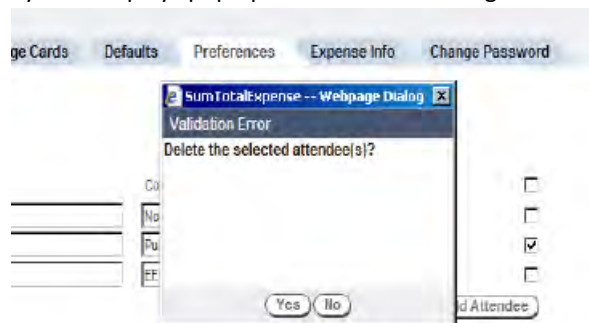
10. Click **YES.**

11. Attendee is removed from Preferences.

12. Click **Save** button to save changes.
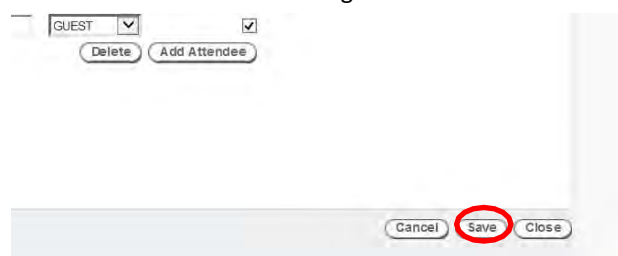
13. Click **Close** button to return to SumTotal home page.

Adding Proxy Submitter's and Approver's

1. Proxies are added to create and submit expense reports on behalf of a user.

2. To Add a Proxy Submitter, click on **Edit User Preferences**
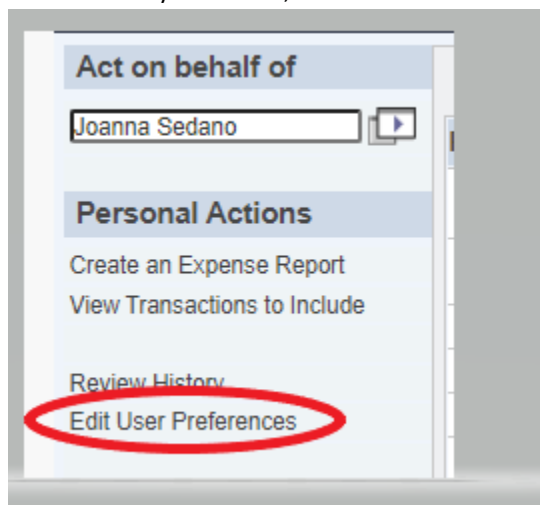
3. Under the **Proxies** tab, click the prompt **arrow** next to the **Submitter** Field.

4. System displays list of all active SumTotal Users.

5. Search for the employee.
   ➤ Easiest way to search is by the employee's last name. Type in the employee's last name in the search box, click on the drop-down arrow, select **Last Name,** and then click on **Search**.

6. This will display all employees within that search criteria.

7. Click on desired employee to add as Proxy Submitter.

8. Selection is added to Proxy Submitter list.

9. Click on the **calendar** next to the Start Date Field to select Proxy submitter **Start Date**, which will display in this field once identified.

   ➢ Enter End Date if proxy submitter will only be a proxy for a limited time.
   ➢ Leave End Date blank if proxy is indefinite.

10. User can have multiple Proxy Submitters.

11. When manager assigns a Proxy Approver, they will include the start and end date for the duration.

12. Once assigned; expense reports submitted for approval will be sent to the proxy approver only.

13. To add a proxy approver, click on the prompt **arrow** next to the Approver field.

14. Follow same steps for searching for an employee.

15. Click on desired employee to add as proxy approver.

16. Selection is added to proxy approver.

17. Click on calendar to select proxy approver Start Date.

18. Enter End Date the proxy approver will no longer need to approve expense reports on your behalf.
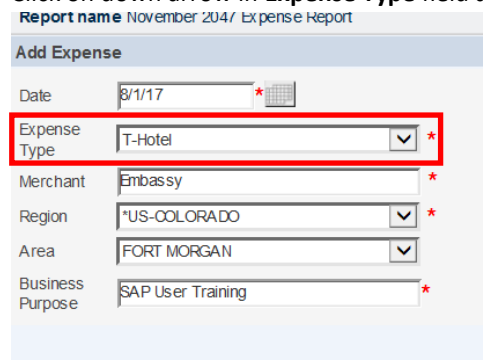
➢ All expense reports submitted for approval will be sent to the proxy approver: (based on Start and End Date)

➢ Be sure to always enter End Date for proxy approver. If no End Date is entered all expense reports submitted will continue to be sent to proxy approver until End Date is entered.

➢ User can have only one proxy approver during a given time
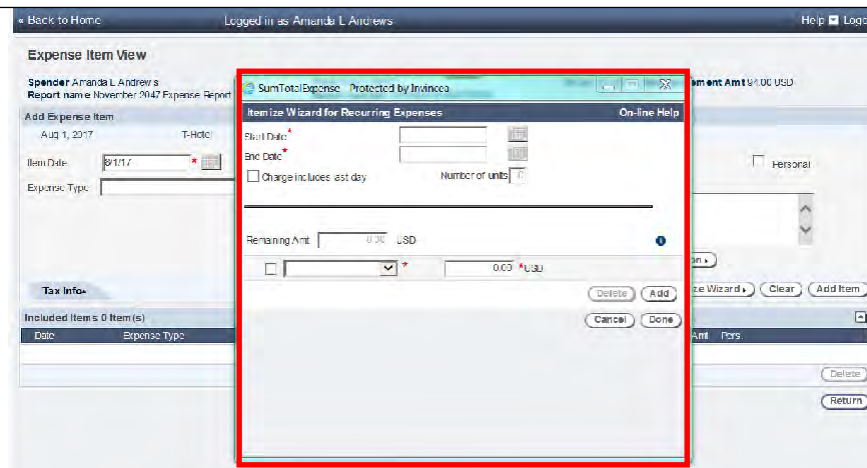
Adding Hotel Expense Allocation and Itemization
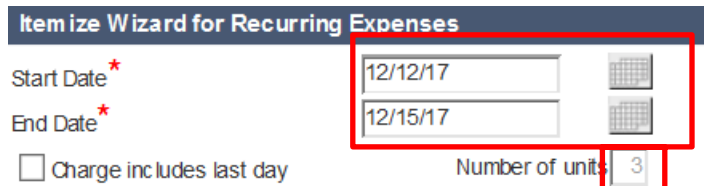
1. Expense types which require pre-approval documentation to be obtained and provided with receipts are:
   ➢ Spousal Travel
   ➢ International Travel

2. Users will enter a business purpose for each expense added to an expense report, and The Description field can be used for further explanation for expense if required.

3. Click on down arrow in **Expense Type** field and select T-Hotel expense type.

4. Enter Business Purpose- Must adequately describe why the expense(s) was incurred.

5. Click Allocation button- Refer to **Step 7** for allocation process.

6. Once the Allocation is complete, click the **Itemize** button.
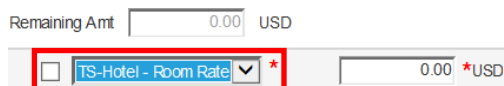
7. System displays **Itemization Wizard** for Recurring Expenses.

8. The Wizard should only be used for reoccurring charges (room rate, taxes, etc.)

9. Enter **Start Date** (first night) and Enter **End Date** (last night), by clicking on the calendar next to each field.
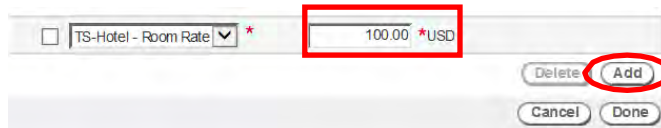
    ➢ System will calculate Number of days

10. Click drop-down arrow to select TS-Hotel-Room Rate Sub Expense
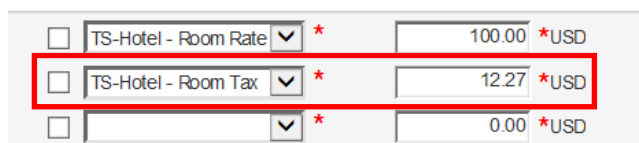
11. Enter the Room Rate Amount and click on add.

12. System displays fields for additional items to be selected.

13. Select TS- HOTEL- Room Tax and enter the amount.

14. Remaining Amt. field will display remaining amount that needs to be itemized, if all is itemized correctly the remaining amount should be 0.00.

➢ Hotel must be itemized out by Room Rate and Tax, per day/night of stay.

15. Once the Room Rate and Tax have been entered, click the **done** button.

16. Expense will show itemization by day in the included Items section.

➢ The system adds a "Grey" validation icon with a hover over message that states "Allocations haven't been externally validated" as the sub expenses have not been saved to "Add Expense" yet.

17. Click **Return** button.

18. Click **Save Changes** button.

19. If no validation errors occur, the system displays a **green icon** to the right of the expense line.

20. System will display a hover over message that states "External Validation Successful" at the expense report line (sub-expense) level.

21. Click **Save Report** button

Credit Card Transaction Marked Personal

1. Per the 10.2 Policy, personal purchases of any type using the Corporate OneCard are not permitted. Personal charges must be handled as separate transactions using your personal card.

   ➢ Mark the expense as Personal in SumTotal. To mark an expense personal in SumTotal:
   - Create an expense report and include the pending expense
   - Open the expense line item. On the right-hand corner by the Description field, there should be a Personal box. Check the box to make Personal.
   - Hit Save Changes. This is all you need to do.

   ➢ If there are no Cash out of Pocket expenses that will cover the cost of the Personal charge, a check/money order for the amount owed will need to be sent to the following address. Check/Money Order should be made payable to **Xcel Energy.**
   - **Corporate OneCard Department 9500 Brighton Road Henderson, CO 80640**

   ➢ If used there will be compliance message pop up, sample message:
   - Reminder – Personal use of the Corporate OneCard is not permitted; personal charges must be handled as separate transactions using your personal card.

   ➢ If personal use occurs; the Money Owed/Personal Use form is required to be filled out and attached as a receipt to the expense report (follow instructions on form if a payment is due to Xcel).

   ➢ Card Admin team will monitor and escalate non-compliant purchases.

Enter Cash Out of Pocket Expense

1. Per the 10.2 Policy, the use of personal card or cash out of pocket for business purposes should be rare. Unless otherwise noted in the policy (i.e., tips, tolls, mobile, mileage), it is only appropriate to claim cash out of pocket reimbursement for expense incurred while traveling when credit cards are not accepted or if an employee inadvertently uses personal credit card for business travel or business-related expenses.

2. Cash out of pocket expenses are monitored to ensure the Corporate OneCard is appropriately used.

3. Cash out of pocket expenses are entered on Add Expense Tab. All subsequent screens will refer to Add Expense.

4. System displays **Add Expense** tab on Edit screen.

5. Click on down arrow in Expense Type field and Select the correct expense type.

6. Enter Information in all required fields.

7. Enter Business Purpose for the expense.

8. Click **Allocation** button.

9. Make sure that the Payment Method is Cash out of Pocket.

10. Enter in the Spent Amount.

11. The receipt field will always say **Receipt Included** because All Cash out-of-pocket expenses require an itemized receipt regardless of amount; exceptions include reasonable tips and tolls.

12. Click on the **Allocation** Tab. Refer to **Step 7** for the 3 Ways to Allocate.

13. Once Allocation is complete, Click **Add Expense** button.

14. System displays Add Expense on **Add Expense** tab.

15. Added expense is displayed in **Included Expenses** section.

- If no errors occur, system displays green icon (right of the expense line) with hover over message, stating "External Validation Successful".

16. Click **Save Report** button to save report in draft status.

Add Mileage expense

1. Per Corporate Policy, Xcel Energy only reimburses mileage for use of personal vehicle for company business. Xcel does not reimburse gasoline as additional expense, gasoline. There are 2 expense types for mileage reimburses; T-Personal Car Mileage – This expense type is selected when single round trip (i.e. MDC to 1800 Larimer and back to MDC); T-Multi-Trip Mileage – This is used when traveling to multiple locations for business related activities. T-Multi-Trip Mileage requires a Mileage Log be attached as a receipt to substantiate the mileage claimed.

Single Trip mileage.

1. From the **Add Expense** tab select **Expense Type** (T-Personal Car Mileage).

2. Enter Required Information.

3. Enter total number of miles for single trip (round trip).

> ➢ System calculates the number of miles entered times the mileage rate stored within the system.

4. To complete required data, click on **Mileage** button.

5. Enter Point of Departure and Destination.

6. Select Round Trip check box.

> ➢ Number of miles entered in previous screen is defaulted in Distance field.

7. Click on **Save and Return** button.

8. Refer to **Step 7** for Allocation Instructions.

9. Click **Add Expense** button.

10. If no errors occur, system displays a green icon (to the right of the expense line). If the user hovers over the "Allocation" the system will display a hover over message that states "External Validation Successful".

11. Expense is added to Included Expenses.

12. Click **Save Report** button to save report in draft status.

Mileage Multi-Trip.

1. From the Add expense Tab, select Expense type T-Mileage- Multi-Trip Expense Type.

2. Enter Required Information. They will all have red (*) next to the required information.

3. Enter total number of miles for multi-trip.

  ➢ System calculates the number of miles entered times the mileage rate stored within the system.

4. Refer to **Step 7** for Allocation Instructions.

5. Mileage button is not required. The mileage log is required documentation and will be used as the receipt. Scan the mileage log and upload to expense report with all receipts.

6. Click **Add Expense**.

7. Expense is added to Included Expenses.

8. If no errors occur, the system displays a green icon to the right of the expense line. If the user hovers over the "Allocation" the system will display a hover over message that states "External Validation Successful."

9. Click **Save Report** button to save report in draft status.

Removing Pre-Defined Allocations

1. From SumTotal home page, Click on Edit User Preferences link under Personal Actions.

2. Click on **Defaults** tab.

3. Click **Delete** button.

4. System removes defined allocation selected.

5. Click **Save** button.
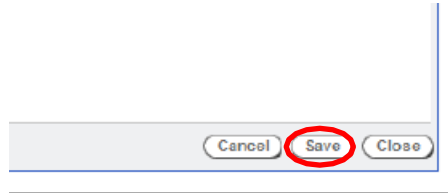
Review Policy Info Tab

1. SumTotal provides the ability to flag an expense based on <u>10.2 Travel and Employee Expense Reimbursement</u>.

2. The expense will be flagged with a yellow icon to the left of an expense when Expense Type exceeds policy spend/cap:
    ➢ System will flag Life Event expense type when amount per person is greater than $70.
    ➢ System will flag is Receipt has been Lost
    ➢ Other Expense Types are flagged to ensure appropriate use.
        • Other Purchase
        • Other Travel
    ➢ The System will also flag Meal expenses that are over the $6 daily meal allowance.

3. All expense reports with flagged expense(s) will be sent for back-office audit review. Non-compliance is monitored and reported monthly.

4. The system will display policy tab on expense which includes policy details of the flagged expense.
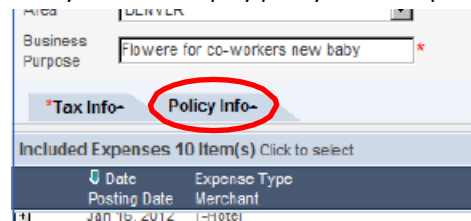
5. The Policy Info tab will explain why the expense is a violation of policy.
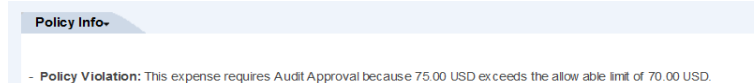
6. Once all the required information has been entered and user clicks on Save Changes. The following message will pop up.

Date: 07/31/2023

7. System displays error regarding policy violations and required action to be taken.

8. Description is required – Enter explanation of why amount exceeds policy limit.

9. User has option to either Ignore for Now or Change Now.

10. Expense is added to Included Expense section with red icon displayed to the left.

11. Grey Icon and hover over message Allocations haven't been externally validated.

12. Double click on expense to open.

13. Enter explanation in the **Description** box as to why amount exceeded policy limit.

14. Click **Save Changes** button.

15. Expense is added to Included Expenses section with yellow icon displayed to the left of expense.

16. The system will perform the accounting validations and display a green icon and hover over message that states, "External Validation Successful".

17. Click Save Report button to save in Draft Status.

18. This will still be sent to Audit for Second Approval.

Lost Receipt

1. Click in Receipt field and in drop-down arrow, select **Lost (more information on Lost Receipts can be found on page 8)**.

2. Click on **Save Changes** button.

3. System displays View Summary tab.

4. Expense is added to Included Expenses section with yellow icon displayed to the left of expense.

5. The system will perform the accounting validations and display a green icon and hover over message, stating "External Validation Successful".

6. Double click on expense to open.

7. Click on **POLICY INFO** tab to review Policy violation message for clarification.

8. POLICY INFO tab opens with message regarding next steps that system will take – expense items submitted with yellow icons will be sent to Audit for second-level review and approval.

Date: 07/31/2023

9. Click on **POLICY INFO** tab to close window.

10. Click **Save Report** to save in draft status.

11. Click **Back to Home** to return to SumTotal Home Page.
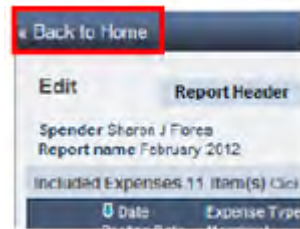
12. Click on **Forms** under Quick Links on SumTotal home page.

13. Click on Lost Form link.

14. Or it can be found here: <u>Lost Receipt Form</u>.

15. Fill out all fields on form.

16. Click on Print Form button to PDF the form.

17. This form must be signed by spender and approving Manager.

18. Scan with other receipts and upload signed version with all receipts.

Date: 07/31/2023

Electronic File Location:	http://xpressteams.xcelenergy.com/sc/reference_home/default.aspx

Changes to Procedure:

Date of Change	Reason for Change	What Changed?	Updated By:
October 2019	System Upgrade	Personal use and compliance messages	Vanessa Villa & Kim Hudson
August 2021	Bank Change/SharePoint Updates	Minor updates to update verbiage from BMO to US Bank, etc.	Vanessa Villa, Karolyn Hedquist, Joanna Sedano
April 2023	Incorrect Contact Information	Removed Vanessa Villa, added Get Assist. Link, Travel and Expense Homepage Link	Susan Weatherly
July 2023	Corrections and clarifications	Lost Receipt, Expense Type, Business Purpose, Meals Personal use instructions. Links: Lost Receipt , Money Owed ,Expense Types	Susan Weatherly

Resource Appendix:

Post Additional Resource location	
Sample output	
Links to resource documents	
Distribution List	

Date: 07/31/2023

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<Enter Name of your Business Unit>

Procedure Name:	SumTotal Approval Approving an Expense Report

Responsibility:

Primary:	Management of Card Holders
Backup:	SumTotal Admins

Frequency / Due Date:	Monthly, Every 30 days

Summary / Background:

This document outlines how the manager of the employee can approve or reject the expense report or an expense item in SumTotal

Required Tools and System Access:

(1) SumTotal
(2) ExpressNET
(3)

Contacts:

Name	E-Mail Address	Phone Number	Department / Title
Supply Chain Hotline		303-628-2644, Option 1	Corp Card Department
Get Assistance Ticket	Supply Chain Get Assistance (Sharepoint.com)		Corp Card Department
Travel and Expense Sharepoint Site	Travel and Expense – Home (sharepoint.com)		

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High Level Process Summary

Step 1 - Log into SumTotal

- o   From **XpressNet**, click on **Job Tools** from the main menu.

- o   Select **Travel and Expenses.**

- o   Select **Employee Expense.**

- o   Select **SumTotal.**
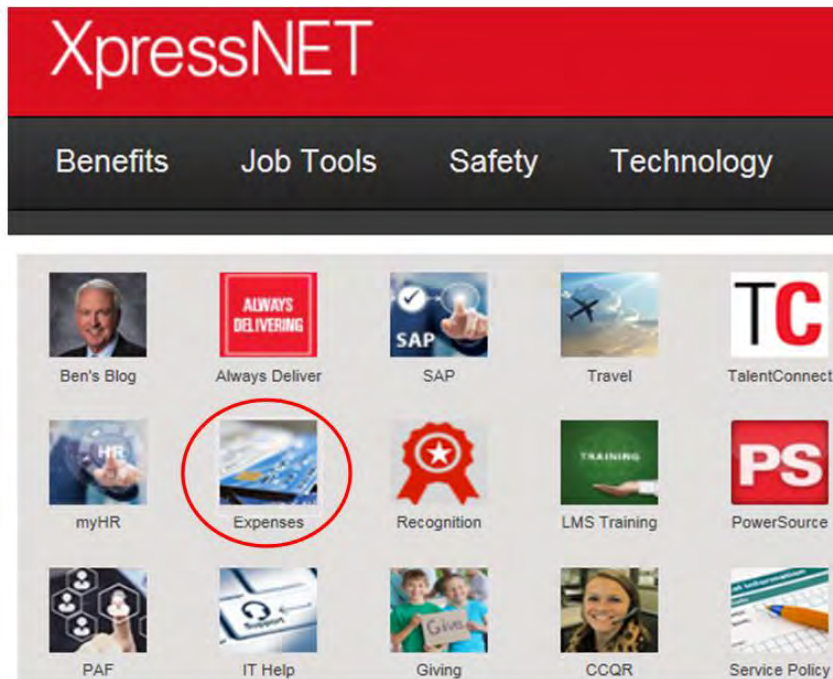
➢   System displays **SumTotal** home page

- o   To Logout of the application, click on **Logout** link in the top right corner of the screen

- o   System closes

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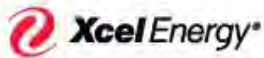
SUPPLYCHAIN

Approving an Expense Report

Step 2 - Review Home Page - The approver can view the expense report(s)

➢ Click the **View Documents to Approve** under **Management Action** list and it will navigate you to all **Approval Items**

 o Approvers will receive an e-mail notification when an expense report has been submitted for review and approval. This notification is also sent to the inbox on the SumTotal home page.

 o The top section, **Approval Items,** displays a list of expense reports that have been submitted for approval.

 o The lower section under the **Included Expenses** tab displays a quick view of all expense(s) included in the above selected report.

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> ➤ **Review the compliance response(s) by hovering over the three "…" on the right of the expense report.**

  o Yellow comment box will appear:

  o The expense(s) with the "**+**" to the left indicates the expense has been itemized to include expense line items (sub expenses).
  o Click the "**+**" to display expense line items

Northern States Power Company
Job Aid: Approving an Expense Report
Xcel Energy

Docket No. G002/GR-23-413
Exhibit__(SSB-1), Schedule 5C
Page 5 of 30

SUPPLYCHAIN
Approving an Expense Report

- ➢ Approver must review all expenses to ensure purchases are in compliance with the Procurement Matrix.
- ➢ The approver can approve or reject an expense item or the entire report.
- ➢ **Note:** A yellow icon to the left of expense report indicates expense(s) within the report that have been flagged as non-policy compliant.
  - ○ Select policy link to review: 10.2 Travel and Employee Expense Reimbursement

Approvers are required to review all expenses within an expense report to ensure they are appropriate and compliant with the 10.2 Travel and Employee Expense Reimbursement policy . Once the approver determines if each expense is or is not an appropriate business expense, the approver can approve or reject accordingly.

If an expense is inappropriate or is non-policy compliant the approver will review and decide to approve or reject.
Rejected expense(s) will be sent back to the spender (employee) to adjust and/or mark personal. Expense(s)
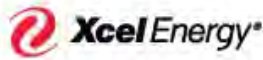
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marked personal will be offset by any cash out of pocket expense(s) in expense report. Any remaining amount will be reimbursed to employee or owed Xcel Energy. Employee must write a personal check/money order payable to Xcel Energy and submit with the Money Owed Xcel form and send to Corporate Card Department – 9500 Interstate 76, Henderson, CO 80640.

The system will display the policy tab indicating which policy details of the flagged expense are non-compliant.

All expense reports with flagged expense(s) will be sent for back office audit review. Non-compliance is monitored and reported on a monthly basis. Personal use of the Corporate Card is not permitted.

➢ Managers will ensure employees follow the guidelines for Personal items on expense reports:

○ Money Owed to Xcel for Personal use form is completed and attached as receipt.

○ Compliance message is Accepted and review comments as to why personal use occurred.

○ Personal expenses (e.g., movies, toiletry articles, etc.) are not reimbursable

○ In instances where the corporate credit card is not accepted, the Employee should claim the business expense as cash out of pocket on the expense report and the approving Leader can approve the expense along with the proper original itemized receipt documentation

Cash out of pocket expenses are monitored to ensure the Corporate Credit Card is used appropriately.

Employees are required to reconcile credit card transactions within 30 days from the posting date and Managers must ensure employees are meeting this requirement.

○ All Credit card transactions are monitored monthly to ensure timely reconciliation

○ Reminder notification is sent to spender 15 days from transaction(s) posting date

○ If the transaction(s) remain unreconciled, delinquency notification will be sent to spender and spender's manager on day 46 and every day thereafter until transaction(s) have been reconciled and submitted for approval

○ Credit card accounts are suspended at 60 days

○ Credit card accounts are closed at 90 days

○ If credit card account is closed due to 90 day delinquency, employee will be required to obtain approval from Director of Supply Chain Process Control to apply for new credit card.

Delinquency is tracked based on the "posting date" of the credit card transaction(s).
➢ We have 5 different notifications in SumTotal. They are set up as follows:
➢ Notify Spender: Stale CC Transactions - This notification is sent to the spender 15 days after Credit Card transaction(s) posting date. This is a reminder that they have CC transactions that have not yet been added to expense report and that transactions must be added to expense report within 30 days of incurred transaction.
➢ Notify Spender and Supervisor: Stale CC Transactions - This notification is sent to the spender and Level 1 approver 45 days after credit card transaction(s) posting date. This email states that spender has cc transactions over 30 days that have not been added to expense report. They must reconcile and submit expenses within 15 days from the date of first notifications (this notification will be sent daily until transactions are added to expense report.
➢ Notify Spender: Document awaiting to be submitted - This notification is sent to the spender has expense report with credit card transactions that are 45 days from CC Transaction(s) posting date. They must submit expense report within 15 days from the date of the first notification (This notification will be sent daily until expense report is submitted for approval)
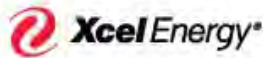
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Approving an Expense Report

- o Notify Approver: Document approval is overdue - This notification is sent to Approver when they have expense report(s) awaiting their approval for over 15 days (This notification will be sent 7 days from date expense report was submitted for approval and again 7 days later, if not approved within 7 day from 2nd notification expense report will skip to level 2 approver)

- o Notify Approver: Approval level has been skipped - This notifies Level 1 approver that approval has been skipped and expense report has been sent to level 2 approver for approval.

Step 3 – Open Expense Report - Approver will select the appropriate expense report.

- o Click on and highlight the report

- o Click **Open** button

- ➢ System displays the **View Summary** tab with details of the expense report document

- o Click on **Report Header** tab

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- ➢ Review Report Name and dates.

- ➢ Ensure the compliance certification checkbox is marked next to compliance message

    - o Note: Approver will reject expense report if compliance message box is not checked **Reject An Expense Report**

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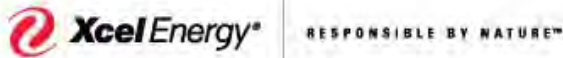
➢ Click on **View Summary** tab to return to the details of the expense report.
➢ From the **View Summary** tab a list of expense(s) included in report to be reviewed will be displayed.

Step 4 – Open & Review Receipts - The receipt images will be reviewed and compared to each expense item on report.

   o To view the receipt packet:

      ▪ Click the **View Receipts** button (circled in the red)

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Approving an Expense Report

- The system will display a scanned image of uploaded documentation.
- There could be multiple images make sure to scroll to view all or click on each item to view all receipts.
- Review and validate appropriate for expense item

- From the **View Summary** panel click on the expense line to open and review.

Step 5 – Review Meal Type Expense – Expense types are grouped by "m" (meal), "P" (purchsing) and "T"(travel) catagories.

- o All meal type expenses require itemization at line item level to identify meal vs. alcohol portion.

- o All meal type expenses require number and list of attendees.

- o Approver reviews the information entered by the Employee. Specific things approver should look at when reviewing **Meal type** expenses include:

  - • Ensure **Expense Type** is accurate for expense
  - • Ensure **Business Purpose** is adequately documented to clearly describe business reason for expense
  - • Ensure **Number of Persons** is correct
  - • Ensure expense line item(s) is **allocated** to the correct accounting string
  - • Ensure List of **Attendees** is included
  - • Ensure meals are **itemized** and meal vs. alcohol portion identified when applicable
  - • Ensure **tax** information is entered as expected
  - • Ensure expense does not exceed **Daily Meal Allowance per person/per day**

Note: The system will flag all meal type expense(s) when total amount exceeds corporate policy.

- o Review and ensure **Expense Type** selected is accurate for expense.
- o Review **Business Purpose** to ensure it provides and adequately documents the business reason for the expense.

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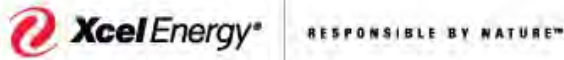
SUPPLYCHAIN
Approving an Expense Report

- o Review and ensure **Number of persons** is accurate.

- o **Spent Amt**, if a receipt is required, verify that the report amount equals the itemized receipt amount.

- o **View Receipt**, if a receipt is required, you need to verify that the receipt(s) matches all of the expense submitted.

- o Meals less that $25.00 do not require a receipt and the field must be changed to show **Not Required.**

➢ Click on **Allocation** button to review accounting allocation(s) are correct – see job aid on how to modify default IO's

➢ Verify **Expense Line** item(s) are allocated to the correct Internal Order.

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➢ Click the **Done** button

➢ Click the **Attendee** button

➢ Review attendee(s) name and information. **Note:** All meal expense types require number and list of attendee(s).
➢ Click **Done**.

➢ Review itemization by selecting the **Itemize** button OR

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➢ Select the "+" to expand and review the itemization

➢ Click on **Tax Info** tab to review sales tax.

➢ The **Tax Info** tab displays the **Sales Tax Paid** and **Amt of Sales Tax Paid** fields.

➢ Review and verification have been completed.

➢ Click on **Tax Info** tab to close

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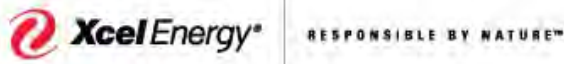
SUPPLYCHAIN
Approving an Expense Report

➢ Repeat steps to continue reviewing additional expense items

OR

➢ Approve An Expense Report

OR

➢ Reject An Expense Report

Step 6 – Review Purchase Type Expense - Expense Types are grouped by "**M**" (Meals), "**P**" (Purchase) and "**T**" (Travel) categories.

➢ Approver reviews the information entered by the Employee. Specific things approvers should look at when reviewing **Purchase Type** expenses include:

- Ensure **Expense Type** is accurate for expense
- Ensure **Business Purpose** is adequately documented to clearly describe business reason for expense
- Expense Line item(s) are **allocated** to the correct accounting string
- Ensure List of **Attendees** is included, if applicable
- **Purchase** expense types that require number and list of attendees/recipients include

    P-Recognition-Entertainment

    P-Recognition-Safety

    P-Recognition-Gifts

    P-Entertainment-Tickets

    P-Life Event-Gifts
- Ensure t**ax** information is entered as expected
    - Ensure correct **Facility Code** is selected

➢ The **Expense View** screen displays the expense details under the **View Expenses** section.

➢ Review and ensure the above listed items are entered correctly (i.e. Expense Type, Business Purpose, Nbr of person etc.)

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➤ Review and ensure **Expense Type** selected is accurate for expense.

➤ Review **Business Purpose** to ensure it provides and adequately documents the business reason for the expense.

➤ Click on **Allocation** button.

➤ Review accounting allocation(s) are correct.

➤ Click the **Done** button.
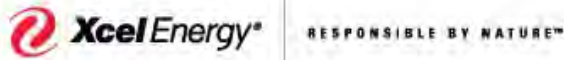
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- ➢ From the **View Expense** panel click on **Tax Info** tab to review and ensure sales tax is entered or exempt.

- ➢ Review and ensure **Sales Tax Paid** is Yes and **Amt of Sales Tax Paid** is entered.

- ➢ If **Sales Tax Paid** field is marked **No** and amount is zero, check to ensure correct exempt code was selected.

- ➢ If tax is owed, but was not charged; ensure the exempt code **XXX-NOT EXEMPT- USE TAX OWED** has been selected. This code informs the tax department to accrue and pay the tax to the appropriate taxing authorities.

- ➢ **Facility Code** defaults from users's profile. **Facility Code** is used to identiy where we took possesionof the item(s).

- ➢ Ensure appropriate facility code is entered for where material was shipped/used.

- ➢ Click on **Tax Info** tab to close window

- ➢ Review and verification have been completed. The approver can repeat steps to continue reviewing additional expense items

    OR

- ➢ Approve An Expense Report

    OR

- ➢ Reject An Expense Report

Step 7 - Review Hotel Type Expense - Expense Types are grouped by "**M**" (Meals), "**P**" (Purchase) and "**T**" (Travel) categories.
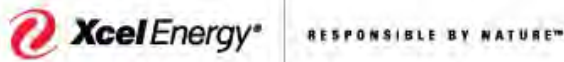
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Approver reviews the information entered by the Employee. Specific things approver should look at when reviewing **Hotel** type expenses include:

➢ Ensure **Expense Type** is accurate for expense.
➢ Ensure **Business purpose** is adequately documented to clearly describe business reason for expense.
➢ Ensure expense line item(s) are **allocated** to the correct accounting string.
➢ Ensure Hotel expense is **itemized** to break out room rate, room tax for each night and any other expense included on hotel receipt.
➢ Ensure **tax** information is entered as expected.
➢ Ensure expense meets Xcel's policy guidelines.
➢ System will flag Hotel expense type when room rate greater than the corporate policy per night.
➢ Review and ensure **Expense Type** selected is accurate for expense.
➢ Review **Business Purpose** to ensure it provides and adequately documents the business reason for the expense.
➢ Click on **Allocation** button.

➢ Review to confirm accounting allocation(s) are correct.
➢ Click **Done** button.

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Approving an Expense Report

➢ Review itemization by selecting the **Itemize** button

OR

➢ Select the "**+**" to expand and review the itemization

➢ Click on View Receipts to compare allocation to receipt.

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SUPPLYCHAIN
Approving an Expense Report

➢ Ensure hotel expense is itemized to break out room rate, room tax for each night and any other expense included on hotel receipt.

➢ Compare the total receipt to verify accurate.

➢ **View Expense** screen displays-Once review and verification have been completed, the approver can:
  o Repeat steps to continue reviewing additional expense items
    ▪ **OR**
  o Approve An Expense Report
    ▪ **OR**
  o Reject An Expense Report

Step 8 – Review Personal Car Mileage (single round trip) Per Policy Xcel Energy only reimburses mileage for use of personal vehicle for company business. Xcel Energy does not reimburse gasoline as additional expense. The required documentation (Departure/Destination and number of miles) is entered in system for Personal Car Mileage.

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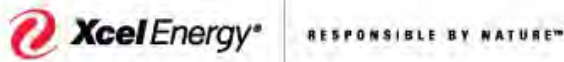
SUPPLYCHAIN
Approving an Expense Report

➢ **There are 2 expense types for mileage reimbursements**

  o T-Personal Car Mileage – This expense type is selected when there is a single round trip (i.e. MDC to 1800 Larimer and back to MDC).

  o T-Multi-Trip Mileage – This is used when traveling to multiple locations for business related activities. T-Multi-Trip Mileage requires a mileage log to be attached to the expense report.

➢ Review and ensure **Expense Type T- Personal Car Mileage** is selected for expense.

➢ Review **Business Purpose** to ensure it provides and adequately documents the business reason for the expense.

➢ Click on **Allocation** button.

➢ Review to confirm accounting allocation(s) are correct.

➢ Click **Done.**

➢ Click on **Mileage** button.

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SUPPLYCHAIN
Approving an Expense Report

➢ Review and ensure correct **Point of Departure** and **Destination** are entered.

➢ Review number of miles is entered accurately.

➢ Click **Save and Return** button to return to **Expense View.**

➢ Personal Mileage (single trip) expense does not require receipts as all documentation is entered in the **Mileage** button.

➢ **Expense view** screen displays - Once review and verification have been completed, the approver can:
  ○ Repeat steps to continue reviewing additional expense items
    OR
  ○ Approve An Expense Report

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　　　　　　　　　OR
　　　　　○　[Reject An Expense Report](#)

Step 9 – Review Mileage Multi-Trip

➢ Review and ensure **Expense Type T – Multi – Trip Mileage** is selected and accurate for expense.

➢ Ensure **Business Purpose** provides and adequately documents the business reason for the expense.

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> ➢ Click on **Allocation.**

> ➢ Review to confirm accounting allocation(s) are correct.

> ➢ Click **Done.**

> ➢ **Mileage** button is not required for multi trip; instead the mileage log is used as the required documentation. Employee must scan the mileage log and upload to the expense report.

> ➢ Review and verification have been completed. The approver can:

> ➢ Repeat steps to continue reviewing additional expense items

> > > **OR**

> ➢ Approve An Expense Report

> > > **OR**

> ➢ Reject An Expense Report

Step 10 – Reject an Expense Approvers have the ability to reject a single expense or all expenses on an expense report.

> ➢ If expense is non-compliant the approver must either:

> > o Approve the expense report/item knowing that it is non-compliant

> > > **OR**

> ➢ Select the item(s) to reject and click Reject

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> ➤ The **Rejection Information** box displays.
>   o Click on drop down arrow and select correct **Reason for rejection** code
>   o Enter information in **Comment** section
>   o Make sure to include enough information to allow the spender to make corrections and resubmit the expense.
>   o Click **Done** button

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Job Aid: Approving an Expense Report   Exhibit__(SSB-1), Schedule 5C
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Approving an Expense Report

➤ The **View Summary** tab displays a list of expense(s) included in report you are reviewing.

➤ Red "**X**" displays next to the reject expense.

Step 11 – Approving an Expense Report After the review and validation process is completed:
  ➤ Click the **X** on the receipt viewer to close.
  ➤ Click **Continue** button.

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Job Aid: Approving an Expense Report   Exhibit__(SSB-1), Schedule 5C
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SUPPLYCHAIN

Approving an Expense Report

- ➢ Click **Submit** to save the report in **Approval Complete** status.
- ➢ The expense report will be retained in the Corporate Expense system in accordance with the Record Retention policy.

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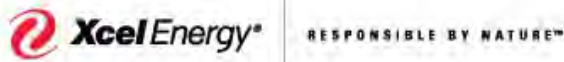
SUPPLYCHAIN
Approving an Expense Report

Approval Summary

Spender Amanda L Ornelas
Report name Test AOrnelas Hotel and Mileage

From May 1, 2019
Report number XETS000795392190052

To May 20, 2019   Reimbursement Amt 853.96 USD

Approved 1 of 2
Included Expenses 1 Item(s)

	Date	Expense Type Merchant	Spent Amt	Domestic Amt	Payment	Region	Allocation	Status
✓	May 1, 2019	T-Personal Car Mileage	14.05 USD	14.05	Cash out of ...	*US-COLORADO		

Comments ▶

Rejected 1 of 2
Included Expenses 1 Item(s)

	Date	Expense Type Merchant	Spent Amt	Domestic Amt	Payment	Region	Allocation	Status
✗	May 11, 2019	T-Hotel Hyatt Regency Hotel	839.91 USD	839.91	Cash out of ...	*US-COLORADO	Itemized...	

Comments ▶

Submit
Cancel

➢ The system will navigate to the **Document to Approve** tab on the **Approve Documents** panel.

➢ Click the **Approval History** tab.

« Back to Home   Logged in as Vanessa Villa   Help ☑ Logout

Approve Documents   Document to Approve   **Approval History**

Approval Items (Click to select)

	Date	Document Name	Domestic Amt		Document Type	Status
☐	Apr 8, 2019	Kimberly Lee Hudson/CR.07 H...	60.00	USD	Expense Report	Submitted for MA
☐	Apr 8, 2019	Kimberly Lee Hudson/CR.09 H...	35.00	USD	Expense Report	Submitted for MA
☐	Apr 8, 2019	Kimberly Lee Hudson/CR.10 H...	80.00	USD	Expense Report	Submitted for MA

➢ **Approval History** displays all reports and status of approver action (approval complete, rejected or partially approved, Submitted for MA, Submitted for Audit).

➢ The expense report will be retained in the Corporate Expense System in accordance with the Record Retention policy.

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                                                  Page 29 of 30

➢ Sort by **Status** to review. Status options include: Approved, Rejected or Partially Approved.

Approve Documents			**Document to Approve**	**Approval History**			

Approval Items   Document Type [All ▾]   Status [All ▾]

Sort by [Submit Date ▾]   [ ] [All ▾]   (Search) (Reset) ▣

	Date	Document Name	Domestic Amt		Document Type	Status
		XETS000535882190001				
☐	Feb 12, 2019	Rajashree Kapre/Test for pa... XETS000535882190013	40.00	USD	Expense Report	Approval Complete
☐	Feb 12, 2019	Rajashree Kapre/Test for pa... XETS000535882190014	50.00	USD	Expense Report	Partially Reviewed
☐	Feb 15, 2019	Rajashree Kapre/Test XETS000535882190018	500.00	USD	Expense Report	Submitted for Audit

Electronic File Location:	S:\MDC-MD\SCPC\SCS

Changes to Procedure:

Date of Change	Reason for Change	What Changed?	Updated By:
October 2019	System Upgrade	No Personal use, compliance Message	Vanessa Villa & Kim Hudson
July 2023	Update Contact Details	Removed individual contacts, added Support Team Contacts. Corrected Links to documents/sites	Susan Weatherly

Resource Appendix:

Post Additional Resource location	
Sample output	
Links to resource documents	
Distribution List	

Northern States Power Company
Employee Expenses Budgeted vs. Actual

Docket No. G002/GR-23-413
Exhibit___(SSB-1), Schedule 6
Page 1 of 2

Employee Expense
Budget and Actual

Table I – Employee Expense
State of Minnesota Gas Jurisdiction

($ 000's)	2020 Actual	2021 Actual	2022 Actual	2023 Forecast	2024 Budget	2024 TY Adj	2024 Test Year
Travel Expense	203	171	271	174	215	(30)	185
Lodging Expense	63	49	119	84	111	(27)	84
Meals Expense	180	185	318	217	232	(107)	125
Misc. Travel Expense	133	139	228	151	234	(66)	168
Travel Expense Subtotal	579	544	936	626	792	(229)	562
Dues & Memberships	20	14	20	28	41	(6)	35
Gifts & Recognition	55	78	78	56	79	(8)	71
Board of Directors	95	81	78	89	98	(4)	94
Total	749	717	1,113	800	1,010	(248)	762

Northern States Power Company
Employee Expenses Budgeted vs. Actual

Docket No. G002/GR-23-413
Exhibit___(SSB-1), Schedule 6
Page 2 of 2

Table II – Employee Expense Actual vs. Budget Comparisons
State of Minnesota Gas Jurisdiction

($ 000's)	2020 Actual	2020 Budget	2020 Variance	2021 Actual	2021 Budget	2021 Variance	2022 Actual	2022 Budget	2022 Variance	2023 Forecast	2023 Budget	2023 Variance
Travel Expense	203	383	-180	171	159	12	271	197	74	174	228	-54
Lodging Expense	63	176	-113	49	64	-15	119	100	19	84	120	-36
Meals Expense	180	138	42	185	62	123	318	67	251	217	268	-51
Misc. Travel Expense	133	393	-259	139	686	-547	228	770	-542	151	235	-85
Travel Expense Subtotal	579	1,090	-511	544	971	-427	936	1,135	-199	626	851	-226
Dues & Memberships	20	51	-31	14	41	-27	20	40	-20	28	40	-12
Gifts & Recognition	55	139	-84	78	51	27	78	67	11	56	72	-16
Board of Directors	95	122	-27	81	85	-4	78	80	-2	89	82	7
Total	749	1,403	-654	717	1,148	-431	1,113	1,323	-210	800	1,046	-247

EER - Schedule 1	Travel Expenses
EER - Schedule 1A	VP and Above
EER - Schedule 2	Meal Expenses
EER - Schedule 3	Entertainment Expenses
EER - Schedule 4	Board of Directors Compensation and Expenses
EER - Schedule 5	Top Ten Compensation
EER - Schedule 5A	Top Ten Expenses - Robert C. Frenzel
EER - Schedule 5B	Top Ten Expenses - Timothy J. O'Connor
EER – Schedule 5C	Top Ten Expenses - Brian J. Van Abel
EER - Schedule 5D	Top Ten Expenses - Brett C. Carter Sr.
EER - Schedule 5E	Top Ten Expenses - Amanda J. Rome
EER - Schedule 5F	Top Ten Expenses - Christopher B. Clark
EER - Schedule 5G	Top Ten Expenses - Patricia Correa
EER - Schedule 5H	Top Ten Expenses - Frank P. Prager
EER - Schedule 5I	Top Ten Expenses - Jeffrey S. Savage
EER - Schedule 5J	Top Ten Expenses - Timothy G. Peterson
EER - Schedule 6	Dues
EER - Schedule 7	Gifts
EER - Schedule 8	Aviation
EER - Schedule 9	Lobbying
EER - Schedule 10	SAP-VIM Transactions
EER - Schedule 11	TIME Transactions
EER - Summary Report 1	2024 Test Year

Employee Expense Reporting
Report Preparation, Rate Case Adjustment Summary, and Analysis Overview

This schedule describes the detailed steps taken to develop the EER Schedules, and the efforts taken by the Company to analyze and review transactions processed within SumTotal, Vendor Invoice Management (VIM) and TIME in order to provide a summary of employee expenses found in those technical systems. The Company's proposed test year adjustment for employee expenses is also summarized in this schedule.

Creation of EER Schedules

The Company took the following steps to create the EER Schedules provided in Volume 3, Required Information, Section IV Other Required Information, Tab 2.

1. The Supply Chain organization provided employee expense information for 2022 corporate credit card transactions, as well as reimbursements for other expenses, such as mileage, that were processed within the Company's primary expense reporting system, SumTotal. The data included transactions that were incurred by employees of the 1) Xcel Energy Service Company (XES), and 2) the Northern States Power Minnesota Operating Company (NSPM). The raw data file contained the transaction lines assigned to employee-related expense accounts that were required in the analysis. While SumTotal has many fields, only those fields that would (1) determine whether the transaction was allocable to Minnesota gas ratepayers, and (2) determine whether the transaction was within the scope of the Employee Expense Statute were included.

2. Transactions were sorted based on the Company's accounting general ledger "Systems, Applications and Products in Data Processing" (SAP) software's "Internal Order" account field to limit the size of the raw data set to be analyzed to approximately 143,000 transactions by including only those costs that were either direct assigned, or that were allocated in part as operating expense to the NSPM Operating Company. Specifically, transactions assigned to Company Code "10" (NSPM) and Company Code "50" (XES) were retained due to the likelihood the entire transaction cost, or a portion of the cost, could be allocated to NSPM. All other transactions, directly assigned to other Xcel Energy legal entities, were eliminated as being outside of the scope of analysis related to rate cases and reporting required for jurisdictions residing within NSPM.

3. Several columns were added to facilitate analysis of the data and creation of the EER Reports. Examples of these analysis fields include: "EER Summary Cost Element" (Employee Expense Report), "EER Schedule #", "Required EER Report Transaction", "Year", "Above / Below the Line", "Board of Directors", "VP & Above", "Employee's Company", "Compensation Level", "Ten Highest Paid Employees", "Executive + Assistant's Transactions", "Executive / Assistant", "Tag", "Keyword", "Vague Business Purpose Desc.", "Meals > $65 per Attendee", "Life Events", "Business Meals - Employee Only", "Flagged Transaction", and "Rate Case Adj. Transaction".

4. Data fields (columns) were also added to the file to manually calculate the amount of each transaction's total that was allocated to the NSPM Company, NSPM Company Gas Utility and to the State of Minnesota Gas Retail jurisdiction. The allocations were derived by matching the accounting used for the SumTotal transaction against tables of the Company's SAP general ledger accounting system data and then assigning the associated allocation factors using Microsoft Excel VLookup functions. The analysis was then

restricted to approximately 78,000 transactions which ultimately allocated above-the-line expense to the State of Minnesota Gas Retail jurisdiction, or as a below-the-line expense to the NSPM Company.

5. Of this data set, the Company's employees who were Vice Presidents and above and their executive assistants during 2022 were identified.

6. Employee expense transactions for our employees with a title of Vice President, or higher were identified. For each transaction of a Vice President or higher employee title, the field "VP & Above" was populated as "Yes". This field was coded as "No" for other employees' transactions. The "Executive / Assistant" field was then populated as "Executive" for executive (having a title of Vice President, or higher) employees' transactions.

7. The executives' Executive Assistants' transactions were identified and coded with their respective executive's name within the "Executive + Assistant's Transactions" field. The "Executive / Assistant" field was then populated as "Executive Assistant" for the Executive Assistants' transactions. The other employees' transactions were populated as "No".

8. Transactions of the ten highest compensated employees were identified. These transactions were coded with the employee's full name within the "EER Report #'s (5A – 5J) Ten Highest Paid Employees" field. This field was left blank for other employees' transactions.

9. Transactions of the top (ten) highest compensated employees were identified as "Ten Highest Paid Employees" within the "Compensation Level" field. Other employees' transactions were labeled as "Not in 10 Highest Paid Group" within this field.

10. Xcel Energy Board of Director-related transactions were identified through the SAP "Internal Order" account field. Transactions coded to "850001936606 - CEO Board of Directors" and a few other internal order accounts were identified to be Board of Director related. In addition, a few other Board of Director-related transactions were coded to the SAP cost element account "5600656 - Fees – Directors". These transactions were coded as "4 - Board of Directors Compensation and Expenses" within the "EER Schedule 4 Board of Directors" field. Other transactions were coded as "No" within this field.

11. Aviation and Travel Services transactions were identified through the SAP "Internal Order" account field. Transactions coded to "850001904397-35000127-Cessna Sovereign MN", "850001904398-35000128-Cessna Sovereign 680-0266 CO" and "850000007001-30144783-Ops 110-110- Executive (Corp)" were identified to be related to corporate aviation. These transactions were coded as "EER Schedule 8 - Aviation" within the "EER Schedule 8 Aviation" field. Other transactions were coded as "No" within this field.

12. Company employees who lobby on behalf of NSPM and Xcel Energy were identified. Their transactions were coded "Lobbyist Employee" within the "Lobbyist Employee" field.

13. Employee expense transactions incurred by employees who lobby from time to time on behalf of NSPM or Xcel Energy were identified and coded as "Lobby Time to Time" within the "Lobbyist Employee" field. This field was coded as "No" for other employees' transactions.

14. The "Posting GL Acct Desc" field was reviewed for the SAP "Cost Element" account codes identified in Table 1 to this Schedule "EER Cost Element Accounts (SAP)". Whenever a transaction was found with a matching code, the "EER Summary Cost Element" field was populated with a "Yes". Transactions coded to all other accounts required for the EER reporting were identified as "No" within this field.

15. For all transactions identified (in Step 14 above), we populated the "Required EER Report Transaction" field as "Yes". In addition, all other transactions required for the Top Ten Compensated Employees, Board of Directors, Corporate Aviation and Lobbyist Employees were coded as "Yes" in the "Required EER Report Transaction" field. Other transactions not required to be included on the employee expense reports were coded as a "No." The "Required EER Report Transaction" field would be used at the end of the process to help develop the EER Reports. This field was used to sort-out only those transactions that would ultimately be included on the various EER Schedules.

16. Transactions coded to "Below-the-Line" FERC accounts based on the SAP "Cost Element" accounts (5600286 Non-Recoverable Recognition, 5600606 Dues – Lobbying, 5600626 Contributions - Charitable, 5600631 Contributions - Community Sponsorships, 5600641 Contributions - Economic Development, 5600636 Contributions - Civic and Political, 5600616 Dues - Chamber of Commerce, 5600621 Dues - Social Service, 5600696 Deductions - Corporate Tickets, and 5600701 Deductions Other) were identified. These transactions were coded as "Below" within the "Above / Below the Line" field. For all other transactions, their respective FERC account assignment determined whether they were coded as "Above" or "Below" within this field.

17. Lobbyists' transactions coded to "Below-the-Line" FERC accounts based on the SAP "Internal Order" accounts 200002781193-NSPM OpCo Regulatory_Gvmt Affs-4264, 200002781198-NSPM OpCo Comm Rel NSPM- 4264, 850001908622-35053156-Pol_Grassroots-SC-409, 850001908624-35053164-VP_Pol_Fed_Aff-SC-409, 850001908626-35053170-Gvmt_Aff-SC-409 and a few other internal order accounts were identified. These transactions were coded as "Below" within the "Above / Below the Line" field.

18. Based on the SAP "Cost Element" accounts included on the Company's EER reports, the combined total number of SumTotal system above the line transactions reviewed was 73,611.

19. Life Event-related transactions that were posted to the SAP "Cost Element" account "5600276 - Life Events" were identified and coded with the word "Yes" in the "Rate Case Adj. Transaction" field.

20. A list of "key words" used to search the data set for transactions which may not be appropriate for rate recovery was developed. The key word list was formed from our experience in past electric rate cases and was designed to identify expenditures related to sporting and entertainment events, life events, recreation, celebrations, recognition, international travel, and lobbying. The key word list contains 120 words and is provided as Table 2 to this Schedule.

21. The key word search was performed on transactions coded both as having the "Required EER Report Transaction" field populated with a "Yes" and the "Above-The-Line" field populated as "Above" on the following SumTotal transactional fields: "Expense Type Name", "Sub Expense Type", "Business Purpose", "Line Description", "Report Name and "Merchant".

    a. Alcohol-related transactions were labeled "Alcohol" within the "Key Word" analytic field. In addition, key word searches were performed to identify any other alcohol-related transaction that was incorrectly coded, or that was not itemized and reported within the "Sub Expense Type" field as being alcohol-related. Alcoholic beverage-related transactions were coded with the word "Yes" in the "Rate Case Adj. Transaction" field.

b. International travel related transactions were identified and labeled as "International" within the "Key Word" field, except for international travel alcohol-related expenses which were labeled "Alcohol." Transactions coded under the "Expense Type" as "Travel-Airfare International" were labeled "International" within the "Key Word" field. Other transactions of those employees who assigned airline costs to "Airfare – International" were reviewed to identify the related lodging, meals and other costs associated with their international travel. These transactions were also labeled as "International" within the "Key Word" field. Finally, other transactions of those employees having traveled abroad were searched based on the "Expense Incurred Date", "Business Purpose", "Line Description", "Report Name" and "Merchant" to identify any remaining transactions associated with their international travel. These transactions were labeled as "International" within the "Key Word" field.

c. Transactions that were not posted to the SAP "Cost Element" account "5600276 - Life Events" but that were later identified by key words associated with life events such as "Funeral", "Bereavement", "Flowers", "Floral", "Wedding", "Birthday", "Baby", etc. were coded with the word "Yes" in the "Rate Case Adj. Transaction" field.

d. Gift-related transactions processed to merchant OC Tanner using the corporate recognition program Xcelebrate were identified and coded as "Corp Recognition" in the "Recognition Expense" field and were not included in the 2024 test year employee expense adjustment. Corporate-related recognition gifts presented under the Xcelebrate program were coded as "Recognition (Gift)" within the "Key Word" field.

e. Gift related transactions that were not previously identified by the key word search process and that were coded under the "Expense Type" of "Recognition - Safety" were identified and labeled as "Recognition (Safety)" within the "Key Word" field.

f. Gift related transactions that were not previously identified by the key word search process were identified and labeled as "Gift" within the "Key Word" field if not coded under the "Expense Type" of either "Life Event Gifts", or "Recognition - Safety".

g. Other gift-related transactions were identified and labeled as "Gift" within the "Key Word" field if they were not previously identified by the various key words (other than "Gift") but were coded under the "Sub-Expense Type" of "Career Event-Gift", "Engagement-Gift", or "Recognition-Gift".

h. Recognition related transactions were identified and labeled as "Recognition (Meals)" within the "Key Word" field if not identified by the various key words (other than "Recognition") but coded under the "Sub-Expense Type" of "Recognition - Meals", "Career/Life Event-Meal", or "Engagement-Meal".

i. Recognition-related transactions were identified and labeled as either "Recognition (Gift)", or "Recognition (Meals)", within the "Key Word" field if not identified by the various key words (other than "Recognition") but were coded under the "Sub-Expense Type" of "Engagement-Event".

j. Recognition related transactions were identified and labeled as "Recognition (Safety)" within the "Key Word" field if not identified by the various key words (other than "Recognition") but that were coded under the "Expense Type" of "Recognition - Safety."

      k.   Recognition related transactions were identified and labeled as "Recognition (Gift)" within the "Key Word" field if not identified by the various key words (other than "Recognition") but were coded under the Expense Type "Recognition-Employee Engagement" and the Sub-Expense Type "Engagement-Gift".

      l.   The Business Purpose field of transactions that were identified by searching for the recognition-related key words "Appreciation", "Award", "Event", "Thank You", "Gift" and "Recognition" was inspected to determine whether the transaction pertained to safety. The safety-related transactions were assigned "Recognition (Safety)" within the "Keyword" field.

      m. Key word searches often included any conceived common abbreviations of words, such as "Tckt" or "Tix" for "Ticket", "Avs" for "Avalanche", "T-Wolves" or "Wolves" for "Timberwolves", etc. The identified 2024 test year adjustment transactions do not include transactions related to retirement "workshops / seminars", "Retiree Broker Finalists," nor "Reach Retirement," etc., that were identified by searching for the key word "Retirement." The identified 2024 test year adjustment transactions do include the celebration/appreciation/meals/gift-related and specific travel-related expenses associated with "Retirement" events.

22. Transactions initially identified through the key word search process, or other cursory review, were subsequently reviewed, line by line, to confirm whether the transaction should be included in the rate case adjustment. Examples of transactions identified as part of the key word search but appropriate for rate recovery could include those incurred with vendors such as Holiday Inn Express, or Holiday Station Store when searching for the word "Holiday", etc. Transactions identified through the key word search process, or other cursory review, but that are not a part of the identified rate case adjustment were coded as "FALSE / OK" within the "Rate Case Adj. Transaction" field.

23. Transactions for Meals > $65 per Attendee were identified. Meal transactions having costs exceeding $65 per attendee were identified as "Meals > $65 per Attendee" within the "Tag" field. These transactions were identified based on review of the SumTotal systems' "Cost Per Attendee" data field. The entire amount of the excluded transactions' total cost that was allocated to the State of Minnesota Gas Retail jurisdiction was included in the identified 2024 test year adjustment by coding the "Rate Case Adj. Transaction" analytic field with the word "Yes".

24. Transactions that are not a reasonable cost of service, based on our experience, including large transaction amounts for airfare or lodging, etc. were identified. This was a line-by-line, field-by-field review. Transactions that would have more appropriately been recorded "below the line" were identified by populating the "Tag" analytic field with the word "Flagged". Non-recoverable transaction costs were coded with the word "Yes" in the "Rate Case Adj. Transaction" field.

25. Transactions that could have a "vague" business purpose were reviewed. A line-by-line review of the "Business Purpose" field of all remaining above the line EER-related transactions that had not previously been assigned the word "Yes" within the "Rate Case Adj. Transaction" field was completed. If the "Business Purpose" field, in isolation, could not convey enough detail about the purpose of the transaction, the word "Vague" was placed within the "Vague Business Purpose" field. Examples include single-word entries such as "Dinner," "Airfare," "Travel," and "Meeting." A line-by-line review of all transactions was performed using a combination of the Business Purpose and Line Description fields to determine if the business purpose remained vague. Since many of the initially flagged transactions contained only acronyms, the acronyms were reviewed in

conjunction with other transaction data fields. A list of 229 acronyms that are commonly used by our employees was developed. It is not intended to be a complete list of every acronym found in the Business Purpose field. It demonstrates that hundreds of industry acronyms are used by our employees and are not necessarily vague descriptions of their activities and costs. The acronym list is provided as Table 3 to this Schedule.

26. If the combined documentation properly supported the transaction, the transaction cost was coded as "FALSE / OK" within the "Rate Case Adj. Transaction" analytic field. The respective cost for each of the remaining transactions identified as having a "vague" business purpose were coded with the word "Yes" in the "Rate Case Adj. Transaction" analytic field.

27. Transactions that were not otherwise identified by the various key words and line-by-line review that pertained to business meals involving only employees were identified. Except for some safety-related functions, all remaining XES and NSPM employees' transactions processed with the Expense Type of "Business Meals - Employee Only" were subsequently coded with the word "Yes" in the "Rate Case Adj. Transaction" field.

28. The employee expense adjustment identified for SumTotal transactions was estimated by selecting all the transactions with "Yes" in the "Rate Case Adj. Transaction" field and summing the amounts that were allocated to the State of Minnesota Gas Retail jurisdiction to quantify the appropriate aggregate adjustment.

29. The "EER Summary Report 1" which reflects the State of Minnesota Gas Retail jurisdiction adjusted 2024 budget test year amount was developed. The summary report provides the employee expense-related costs in the following categories that are identified in accordance to the related detail EER Schedule number that have also been provided to report the Company's 2022 actual expenditures:

    Schedule1 - Travel and Lodging Expenses
    Schedule 2 - Food and Beverage Expenses
    Schedule 3 - Recreational and Entertainment Expenses
    Schedule 4 - Board of Director Expenses
    Schedule 6 - Dues and Memberships Expenses
    Schedule 7 - Gift Expenses
    Schedule 8 - Owned, Leased, or Chartered Aircraft Expenses
    Schedule 9 - Lobbying Expenses

Note: Schedule 5 is a sub-report that provided all transactions of the Company's ten highest compensated employees and is therefore not included in the list above.

The detailed EER Schedules of 2022 actual expenses were developed:
1. Travel and Lodging Expenses
1A. VP and Above Travel and Meal Expenses
2. Food and Beverage Expenses
3. Recreational and Entertainment Expenses
4. Board of Director Expenses
5. EER Schedule 5 provides the transactions of each of the Ten Highest Compensated Employees
6. Dues and Memberships Expenses
7. Gift Expenses
8. Owned, Leased or Chartered Aircraft Expenses

9. Lobbying Expenses
10. SAP Vendor Invoice Management (VIM) Applications Expenses
11. TIME Application Expenses

Each Schedule was given a Line Reference Number. Schedules 1 through 7 include the following SumTotal system data fields:
1. Application
2. Company
3. Expense Incurred Date
4. Expense Category
5. Expense Type
6. Sub Expense Type
7. Business Purpose
8. Line Description
9. Merchant
10. Approved Amount
11. NSPM Company Total Amount
12. NSPM Gas Utility Total Amount
13. State of Minnesota Gas Retail Amount

The following additional data fields are provided on EER Schedules 1A, 2, 5A-5J and 7:
1. Attendees Count
2. Cost Per Attendee

Analysis of Other Company Systems

There may be employee expenses in Company systems other than SumTotal, so an analysis was performed on the transactions processed in the SAP Vendor Information Management (VIM) and TIME payroll systems.

SAP-VIM:
1. In 2022, there were 5,015 transactions processed by the Xcel Energy Service Company (XES) and the NSPM Operating Company (NSPM) to the cost element accounts included in the employee-related expense analysis. Of these, the vast majority, 85.3%, pertain to 4,279 reimbursement request transactions entered by NSPM Company Time Keeper employees to re-fund their respective corporate petty cash accounts for non-labor expense entries incurred by the NSPM union work force across all business areas which are reported within the TIME system. Examples of these entries are per diems, meal allowances, mileage, site allowance, and safety shoes, uniforms, and other similar charges. These expenses are processed within the TIME system so that they are properly reported to the Internal Revenue Service and included in these employees' annual W2 wage statements.
2. Data was queried for XES and NSPM transactions coded to the accounts included on the Company's EER reports, as provided in Table 1 "EER Cost Element Accounts (SAP)". This was done to focus only on transactions that were either direct assigned, or that were allocated in part to the NSPM Operating Company. Transactions that did not directly assign or allocate any costs to the NSPM legal entity were excluded from the data set. The

results of the query were exported to a Microsoft Excel worksheet for further analysis and to enable sharing the information with others.

3. Data fields in the Microsoft Excel file include: "Company Code", "Merged Vendor", "Document Date", "Item Text", "Document Type", "G/L Account", "Internal Order – Key", "Internal Order Type" and "Amount".

4. Data fields were added to track, analyze, and summarize the detailed transactions: "EER Report #", "Record ID", "Year", "Vendor Category", "Above / Below the Line", "Transaction Sort" and "Rate Case Adj. Transaction".

5. Data fields (columns) were added to the file to calculate the amount of each transaction's total that was allocated to the NSPM Company, NSPM Company Gas Utility and to the State of Minnesota Gas Retail jurisdiction. The allocations were derived by matching the accounting used for the transaction against tables of the Company's SAP general ledger accounting system data and then assigning the associated allocation factors using Microsoft Excel VLookup functions. The analysis was then restricted to 576 transactions which ultimately allocated to above-the-line expense to the State of Minnesota Gas Retail jurisdiction, or as a below-the-line expense to the NSPM Company.

6. Transactions coded to "Below-the-Line" FERC accounts based on the cost element accounts 5600286 Non-Recoverable Recognition, 5600606 Dues – Lobbying, 5600626 Contributions - Charitable, 5600631 Contributions - Community Sponsorships, 5600641 Contributions - Economic Development, 5600636 Contributions - Civic and Political, 5600616 Dues - Chamber of Commerce, 5600621 Dues - Social Service, 5600696 Deductions - Corporate Tickets, and 5600701 Deductions Other were identified. These transactions were coded as "Below" within the "Above / Below the Line" field. For all other transactions, their respective FERC account assignment based on the SAP internal order used determined whether they were coded as "Above" or "Below" within this field.

7. The "Vendor Category" field was used to identify whether the transactions pertained to a vendor, Board, or Time Keeper/Employee reimbursement "Request For Payment" (RFP) processed in SAP-VIM, and then distributed to various time-keeper employees to re-fund their respective corporate petty cash accounts. These transactions are excluded from the EER Schedule 10 - SAP Vendor Invoice Management (VIM) Application Expenses, since these payments are captured through the TIME system (as taxable payments on these employees' W2 tax forms). These transactions were coded as "In TIME System per Time Keeper (=Petty Cash Reimb.)" within the "Vendor Category" field.

8. Xcel Energy Board of Director-related transactions were identified through the SAP "Internal Order" account field. These transactions were coded as "Board of Directors" within the "Vendor Category" analytic field.

9. Vendor-related transactions were coded as "Outside Vendor" within the "Vendor Category" analytic field.

10. Based on the cost element accounts included in the analysis, there were 409 transactions that allocated costs to the State of Minnesota Gas Retail jurisdiction during 2022. There were 13 employee expense-related transactions processed within the SAP-VIM system by employees of the Xcel Energy Service Company (XES) and the Northern States Power Minnesota Operating Company (NSPM). There were 89 transactions related to Xcel Energy Board of Directors payments and reimbursements, and 307 transactions related to outside vendors.

11. Transactions that would have more appropriately been recorded "below-the-line" were identified. For transactions identified as such, we populated the "Transaction Sort"

analytic field with the word "Flagged". These transaction costs were coded with the word "Yes" in the "Rate Case Adj. Transaction" analytic field.

12. The employee expense adjustment for the SAP-VIM system's transactions was estimated by selecting all the transactions with "Yes" in the "Rate Case Adj. Transaction" field and summing the amounts that were allocated to the State of Minnesota Gas Retail jurisdiction to quantify the appropriate aggregate adjustment.

TIME:

1. The TIME payroll system's data was queried for the Xcel Energy Service Company (XES) and the NSPM Company employees' non-labor transactions coded to the cost element accounts included on the Company's EER reports, as provided in Table 1 "EER Cost Element Accounts (SAP)". This provided transactions that were direct assigned to the NSPM Operating Company. The results of the queries were exported to Microsoft Excel files and combined for further analysis and to enable sharing the information with others.

2. The total number of TIME system 2022 transaction lines reviewed was 96,530. Of these transactions, 15,055 assigned cost to the State of Minnesota Gas Retail jurisdiction.

3. Data fields in the TIME file include: "CO" (Company), "WORK.DT", "ERNCD DESCR" (Earnings Code Desc), "SAP GL ACCT" (SAP General Ledger Account), "SAP IO WO" (Internal Order), "LVL2 DESCR" (Business area), "LVL3 DESCR" (Sub-Business area), "DEPT DESCR", "UNION" (employee's category - assigned as 'Yes', or 'No'), "Period" and "Amount".

4. Analytic data fields (appended in the spreadsheet's columns following the raw data) were added to track, analyze, and summarize the detailed transactions: "EER Summary Cost Element", "EER Report #", "Utility", "Above / Below the Line", and "NSPM MN Gas Test Year Adj. Transaction".

5. Data fields (columns) were added to the file to manually calculate the amount of each transaction's total that was allocated to the State of Minnesota Gas Retail jurisdiction. The allocations were derived by matching the accounting used for the TIME system transaction against tables of the Company's SAP general ledger accounting system data and then assigning the associated allocation factors using Microsoft Excel VLookup functions.

6. The transactions having activity in 2022 against the accounts included on the Company's EER reports were coded to "Above-the-Line" accounts.

7. The non-labor transaction lines identified within the TIME application were associated with NSPM union employees' tax reportable reimbursements.

8. The TIME application "Earnings Codes" are summarized in Table 4 "TIME Earnings Codes" located at the end of this document.

9. Transactions were reviewed to find any employee expenses that may be "below the line" type transactions. No transactions that would have more appropriately been recorded "below the line" were identified.

10. No TIME application costs from 2022, allocated to the State of Minnesota Gas Retail jurisdiction, were included as an adjustment to the 2024 test year.

Test Year Adjustment

The analysis described above resulted in the following employee expense-related adjustment, reducing the 2024 Budget Test Year cost of service request included in the 2023 State of Minnesota Gas Utility rate case filing:

Based on Service Company & NSPM Company employees' 2022 transactions	Total Amount	NSPM Total Amount	NSPM Gas Utility Above the Line Amount	State of MN Gas Retail Adjustment Amount
SumTotal				
Keyword	$ 1,973,689	$ 970,211	$ 100,817	$ 91,884
Bus Meal (Emp Only)	$ 963,027	$ 674,804	$ 88,632	$ 78,125
Flagged	$ 2,329,127	$ 988,626	$ 50,806	$ 44,612
Vague Business Purpose	$ 195,505	$ 123,944	$ 19,380	$ 17,645
Life Events	$ 145,545	$ 63,601	$ 5,682	$ 5,254
Meals > $65 per Attendee	$ 68,733	$ 27,924	$ 2,264	$ 2,001
Subtotal	$ 5,675,627	$ 2,849,110	$ 267,581	$ 239,522
SAP-VIM				
Flagged Transactions	$ 370,878	$ 149,274	$ 9,516	$ 8,427
TIME (Non-Labor)				
Flagged Transactions	$ -	$ -	$ -	$ -
	$ 6,046,505	$ 2,998,384	$ 277,097	$ 247,949

Exhibit___(SSB-1), Schedule 6 shows the recent annual employee expenses and the 2024 budgeted employee expenses. It also shows the 2024 test year adjustment amount we've estimated. The following tables summarize the historical and test year employee expense results.

Table I – Employee Expense
State of Minnesota Gas Jurisdiction

($ 000's)	2020 Actual	2021 Actual	2022 Actual	2023 Forecast	2024 Budget	2024 TY Adj	2024 Test Year
Travel Expense	203	171	271	174	215	(30)	185
Lodging Expense	63	49	119	84	111	(27)	84
Meals Expense	180	185	318	217	232	(107)	125
Misc. Travel Expense	133	139	228	151	234	(66)	168
Travel Expense Subtotal	579	544	936	626	792	(229)	562
Dues & Memberships	20	14	20	28	41	(6)	35
Gifts & Recognition	55	78	78	56	79	(8)	71
Board of Directors	95	81	78	89	98	(4)	94
Total	749	717	1,113	800	1,010	(248)	762

Table II – Employee Expense Actual vs. Budget Comparisons
State of Minnesota Gas Jurisdiction

($ 000's)	2020 Actual	2020 Budget	2020 Variance	2021 Actual	2021 Budget	2021 Variance	2022 Actual	2022 Budget	2022 Variance	2023 Forecast	2023 Budget	2023 Variance
Travel Expense	203	383	-180	171	159	12	271	197	74	174	228	-54
Lodging Expense	63	176	-113	49	64	-15	119	100	19	84	120	-36
Meals Expense	180	138	42	185	62	123	318	67	251	217	268	-51
Misc. Travel Expense	133	393	-259	139	686	-547	228	770	-542	151	235	-85
Travel Expense Subtotal	579	1,090	-511	544	971	-427	936	1,135	-199	626	851	-226
Dues & Memberships	20	51	-31	14	41	-27	20	40	-20	28	40	-12
Gifts & Recognition	55	139	-84	78	51	27	78	67	11	56	72	-16
Board of Directors	95	122	-27	81	85	-4	78	80	-2	89	82	7
Total	749	1,403	-654	717	1,148	-431	1,113	1,323	-210	800	1,046	-247

Table 1 - EER Cost Element Accounts (SAP)

EER Summary Cost Element Account Grouping	Description	Posting GL Acct Desc
1 - Travel and Lodging Expenses	Travel and Lodging Expenses	5600191 - Employee Expenses Airfare
		5600196 - Employee Expenses Car Rental
		5600201 - Employee Expenses Taxi and Bus
		5600206 - Employee Expenses Mileage
		5600231 - Employee Expenses Parking
	Lodging Expenses	5600216 - Employee Expenses Hotel
	Misc. Travel Expenses	5600211 - Employee Expenses Conf Seminar Trng
		5600236 - EE Expenses Per Diem
		5600246 - Employee Expenses Other
2 - Food and Beverage Expenses	Meal Expenses	5600221 - Employee Expenses Meals
		5600226 - Employee Expenses Meals Non-Employee
3 - Recreational and Entertainment Expenses	Tickets and Other Entertainment Expenses	5600286 - Non - Recoverable Recognition
		5600696 - Deductions - Corporate Tickets
		5600701 - Deductions - Other
4 - Board of Directors Compensation and Expenses	Director Fees and Expenses	5600656 - Fees - Directors
6 - Dues	Professional and Social Dues	5600591 - Dues - Professional Association
		5600606 - Dues - Lobbying
		5600616 - Dues - Chamber of Commerce
		5600621 - Dues - Social Service
7 - Gifts	Recognition and Rewards	5600246 - Employee Expenses Other
		5600271 - Safety Recognition
		5600276 - Life Events
		5600281 - Employee Performance Recognition
9 - Lobbying	Civic and Political Expenses (FERC 426.4)	5600636 - Contributions - Civic and Political

Table 2 - Key Word Search List

Search Order	Keyword	Keyword Lookup	Search Order	Keyword	Keyword Lookup
1	Alcohol	Alcohol	61	Election	Election
2	Drinks	Drinks	62	Legislation	Legis
3	Liquor	Liquor	63	Birthday	Birth
4	Cocktails	Cocktails		Birthday	Bday
5	Holiday	Holiday		Birthday	B-Bay
6	Christmas	Christmas	64	Wedding	Wedding
7	XMAS	XMAS	65	Bridal	Bridal
8	Party	Party	66	Shower	Shower
9	Retreat	Retreat	67	Baby	Baby
10	Gala	Gala	68	Get Together	Get Together
11	Social	Social	69	Rotary	Rotary
12	Recreation	Recreat	70	Club	Club
13	Entertainment	Entertain	71	Spouse	Spouse
14	Golf	Golf	72	Flower	Flower
15	Avalanche	Avalanche	73	Floral	Floral
	Avalanche	Avs	74	Florist	Florist
	Avalanche	Av's	75	Funeral	Funeral
16	Broncos	Broncos	76	Bereavement	Bereavement
	Broncos	Bronc's	77	PAC	PAC
	Broncos	Broncs		PAC	XPAC
17	Gophers	Gophers	78	Senate	Senat
18	Nuggets	Nuggets		Senate	Sen.
	Nuggets	Nugs	79	Repr	Repr
19	Rockies	Rockies	80	PUC	PUC
20	Saints	Saints	81	Team Building	Team Building
21	Timberwolves	Wolve	82	Gift	Gift
22	Twins	Twins	83	Prize	Prize
23	Vikings	Vikings	84	Trinkets	Trinkets
24	Wild	Wild	85	Celebration	Celebrat
25	Game	Game	86	Award	Award
26	Hockey	Hockey	87	Event	Event
27	Tennis	Tennis	88	Appreciation	Appreciat
28	Final Four	Final Four	89	Thank You	Thank You
29	Tournament	Tournament	90	Anniv	Anniv
30	WCHA	WCHA	91	First Day	First Day
31	Super Bowl	Super Bowl	92	Welcome	Welcome
32	Pepsi	Pepsi	93	New Employee	New Employee
33	Field	Field	94	Farewell	Farewell
34	Stadium	Stadium	95	Going Away	Going Away
35	Allianz Field	Allianz	96	Last Day	Last Day
36	Coors Field	Coors	97	Retirement	Retire
37	U.S. Bank Stadium	U.S. Bank Stadium	98	Coach	Coach
	U.S. Bank Stadium	US Bank Stadium	99	Sponsorship	Sponsor
38	Target Field	Target Field	100	Brand	Brand
39	TCF Stadium	TCF Stadium	101	Mall of America	Mall of America
40	MN United	MN United		Mall of America	MOA
41	Bowl	Bowl	102	Movie	Movie
42	Lucky Strike	Lucky Strike	103	Video	Video
43	Concert	Concert	104	Bagel	Bagel
44	Curling	Curling	105	Refreshments	Refreshments
45	Motocross	Motocross	106	Snacks	Snacks
46	Skeet	Skeet	107	Brewery	Brew
47	Ticket	Ticket	108	Beverage	Beverage
	Ticket	Tix	109	Fruit	Fruit
	Ticket	Tckt	110	Ham	Ham
48	Ski	Ski	111	Turkey	Turkey
49	Vail	Vail	112	Cookies	Cookies
50	Face Plant	Face Plant	113	Doughnut	Doughnut
51	Hunt	Hunt	114	Donut	Donut
52	Fish	Fish	115	American Gas Association	AGA
53	Lobby	Lobby	116	American Gas Association	American Gas
54	Political	Politic	117	Edison Electric Institute	Edison Electric
55	Casino	Casino	118	Edison Electric Institute	EEI
56	Hooters	Hooters	119	International	International
57	Resort	Resort		International	Intl
58	Chamber	Chamber		International	Int'l
59	Commission	Commission	120	Recognition	Recog
60	Contribution	Contribution			

Table 3 – Commonly Used Acronyms

Count	Acronym	Definition	Definition's Source
1	ACS	"Dues" - American Chemical Society (ACS) is a congressionally chartered independent membership organization which represents professionals at all degree levels and in all fields of chemistry and sciences that involve chemistry.	Internet
2	AGA	American Gas Association	Internet
3	AICPA	"acct assn" - American Institute of CPAs	Internet
4	AIHA	American Industrial Hygiene Association	Internet
5	ANS	"Dues" - The American Nuclear Society (ANS) is a not-for-profit, international, scientific and educational organization. It was established by a group of individuals who recognized the need to unify the professional activities within the diverse fields of nuclear science and technology.	Internet
6	APDA	American Power Dispatchers Association. Founded in 1946 for the purpose of encouraging and promoting the formulation and attainment of higher professional standards among System Operators (Load Dispatchers and Power Dispatchers), and for the purpose of facilitating the interchange of ideas and information, as well as for the development of a spirit of fellowship, the APDA continues to promote excellence in individual education and professional operation of the North American Bulk Electric System.	Internet
7	ARCM	"Travel for Substation Reliability Summit, ARCM kickoff meeting, and various other meetings" - ARCM stands for Adaptive Reliability Centered Maintenance.	Employee
8	ASDSO	ASDSO - Association of State Dams Safety Officials. In addition to being regulated by FERC DDS we also fall under State Requirements for Security and for two of our dams that is our only regulator.	Employee
9	ASME	American Society of Mechanical Engineers	Internet
10	ATV	Accrediation Team Visit, every four years our training programs in the nuclear area need to be Accredited, similar to accrediation for colleges. Without having an accredited training program, nuclear plants are not allowed to operate.	Employee
11	AWA	Alternative Work Arrangements - roll out of the flexible work arrangement program	Employee
12	BART	BART - Best Available Retrofit Technology evaluations (Energy Supply business area)	Employee
13	Boiler MACT	"""Boiler MACT"" is the name given to national emission standards being promulgated by the Environmental Protection Agency in an effort to curb emissions of hazardous air pollutants (HAP) from industrial boilers and process heaters.	Internet
14	BWROG	"BWR (Boiling Water Reactor) Owners' Group (nuclear) - Mission: To provide a forum, in the spirit of partnership with GE, where utility members can achieve higher plant reliability,	Internet

			maintain and improve plant safety, minimize and share costs and facilitate regulatory interaction.	
15		Byron	"Byron benchmarking" - RESULTS OF THE BYRON NUCLEAR POWER STATION UNITS 1 AND 2 SIGNIFICANCE DETERMINATION PROCESS PHASE 2 NOTEBOOK BENCHMARKING VISIT	Internet
16		CACJA	Clean Air Clean Jobs Act - In late 2010, the Colorado Public Utilities Commission approved an emissions reduction plan for Xcel Energy under the state's Clean Air-Clean Jobs Act.	Internet
17		CGA	Compressed Gas Association (CGA) develops and promotes safety standards and safe practices in the industrial gas industry.	Internet
18		CIPAC	CIPAC - Critical Infrastructure Protection Advisory Council.	Employee
19		CIPC	"NERC Critical Infrastructure Protection Committee (CIPC) - coordinates NERC's security initiatives. The group is comprised of industry experts in the areas of cyber security, physical security, and operational security. CIPC reports to NERC's Board of Trustees. It is governed by an Executive Committee, whose members manage CIPC policy matters and provide support to CIPC's subcommittees and their working groups and task forces.	Internet
20		CLE	Continuing legal education (CLE; also known as MCLE (mandatory or minimum continuing legal education)) is professional education of lawyers that takes place after their initial admission to the bar.	Internet
21		CMBG	"CMBG Conference" - Configuration Management Benchmarking Group (CMBG)	Internet
22		CONTE	"The American Nuclear Society (ANS) is a not-for-profit, international, scientific and educational organization. It was established by a group of individuals who recognized the need to unify the professional activities within the diverse fields of nuclear science and technology. ""CONTE"" stands for Conference on Nuclear Training and Education - An International Forum on Nuclear Training, Education and Workforce Issues.	Internet
23		COSS	Cost of Service Study	Employee
24		CRIB	Any items on the report that say CRIB are items purchased to support Monticello inprocessing at the Chelsea Road Inprocessing Building (CRIB).	Employee
25		CRM	CRM - Customer Relationship Management software.	Employee
26		CRMOC	Corporate Risk Management Oversight Committee	Employee
27		CSAPR	"CSAPR DC 10/02-10/04" - Judicial Review of EPA's Cross State Air Pollution Rule (CSAPR) - imposes limits on the interstate transport of emissions of nitrogen oxides ("NOx") and sulfur dioxide ("SO2") from multiple states in the eastern, Midwestern, and southern United States that, according to the Environmental Protection Agency (EPA), affect the ability of downwind states to attain and maintain compliance with national air quality standards for particulates and ozone.	Internet

28	CVI 15	CVI0015 is "Compliance Violation Investigation #15". The number is assigned by NERC. This is an investigation instituted by NERC "North American Reliability Corporation" who are the regulators overseeing the FERC mandated reliability standards. The investigation is still open and legal holds on all aspects remain in place at this time.		Employee
29	DBO	Distribution Business Operations		Employee
30	DEMS	DEMS stands for Dynamic Energy Management System. The EMS is used in the control centers to manage, monitor, and control the power flow in and grid. NSP, PSCo & SPS are replacing the current Siemens EMS with a GE EMS.		Employee
31	DHS SSA	DHS SSA for Dams - Department of Homeland Security Sector Specific Agency for Dams which is responsible for Dams security.		Employee
32	DHS TSA	"DHS TSA - Department of Homeland Security Transportation Security Administration Office of Pipeline Security which under Secretarial Agreement with the Department of Transportation Regulates our Gas Asset Security.		Employee
33	DistribuTECH	DistribuTECH is the utility industry's leading smart grid conference and exposition, covering automation and control systems, energy efficiency, demand response, renewable energy integration, advanced metering, T&D system operation and reliability, power delivery equipment and water utility technology.		Internet
34	DLT	Distribution Leadership Team		Employee
35	DO	Distribution Operations		Employee
36	DSCC	DSCC - Department of Homeland Security (DHS) Critical Infrastructure Advisory Council (CIPAC) Dams Sector Coordinating Council (DSCC). This is the Private Sector Dam Owner and Operator Coordinating Council.		Employee
37	E&A support	E&A is a required Plant Evaluation and Assessment that is run by the Industry of Nuclear Power Operators and the report and grades are given directly to the CEO – this is a requirement of the operation of nuclear units throughout the country.		Employee
38	EAM	EAM: ideas related to an enterprise asset management and work management system(s). This term is commonly used in connection with the Productivity Through Technology initiative.		Employee
39	ECR	Employee Concerns Program in conjunction with the Management Safety Review Committee.		Employee
40	EDRM	Electronic document and records management (EDRM) aims to enable organizations to manage documents and records throughout the document life-cycle, from creation to destruction.		Internet
41	EDS	EDS stands for "Electric Distribution Standards"		Employee
42	EEAC	"Training for managers in Amarillo, EEAC Conference in New Orleans and Business meetings in Denver". The Equal Employment Advisory Council (EEAC) is a nonprofit employer association founded in 1976 to provide guidance to its member companies on understanding and complying with their EEO and affirmative action obligations.		Internet

43		EEI	Edison Electric Institute		Internet
44		ELS for Diversity	"""50% of 2-day workshop by ELS for Diversity"" - Enlightened Leadership Solutions (ELS) Leadership Development training seminars. - We (ELS) Make Managers Into Leaders quickly and effectively and guarantee your results. The Leadership Challenge: Numerous studies indicate that people join organizations, but they leave bosses. Up to 80% of employee turnover is directly caused by ineffective managers and leaders. Intangible assets like knowledge and information, while hard to measure, account for as much as 75% of an organization's value.		Employee
45		EMD	"Training for EMD Diesel Engines at Engine Systems Inc. in Rocky Mount, NC." - Electro Motive Diesel (EMD) Engines		Internet
46		EMDOG	Emergency Diesel Generator Owners Group		Employee
47		ENTELEC	ENTELEC is a User Association focusing on communications and control technologies used by petroleum, natural gas, pipeline and electric utility companies.		Internet
48		EP	"""Mileage Reimbursement for EP meeting in Minneapolis."" - Emergency Planning is what EP stands for and is the name of the department that I previously supported.		Employee
49		EPRI	The Electric Power Research Institute (EPRI) is an independent, non-profit company performing research, development and demonstration in the electricity sector for the benefit of the public.		Internet
50		EPRI CBUG	The Electric Power Research Institute (EPRI) is an independent, non-profit company performing research, development and demonstration in the electricity sector for the benefit of the public. The EPRI Circuit Breaker Users Group (CBUG) facilitates meetings on each breaker and are intended to provide open discussions on maintenance, maintenance programs, technical issues, operations and maintenance experiences, tools and techniques, motor control center maintenance, switchgear and bus maintenance.		Internet
51		EPU	Electric Power Uprate		Employee
52		ERCM	Electronic Records Content Management. General Counsel was the first department to fully implement it. The software is called Meridio.		Employee
53		ERO	Electric Reliability Organization (Transmission)		Employee
54		ERSC	"Travel to FERC and MISO" -Entergy Regional State Committee		Internet
55		ERWG INPO	INPO - the Equipment Reliability Working Group (ERWG)		Internet
56		ESRI	"Certification" - Esri Technical Certification exams are delivered exclusively at Pearson VUE testing centers, worldwide.		Internet
57		EUEC	"""EUEC conference"" - ENERGY UTILITY ENVIRONMENT CONFERENCE		Internet
58		EU-HRMG	"Travel to Scottsdale (EU-HRMG), Denver" - Electric Utility-HR Metrics (EU-HRMG). The EU-HRMG is a nuclear industry-wide benchmarking project. The primary focus, in addition		Internet

			to benchmarking, is HR Metrics and Staffing & Recruiting for the future.	
59	FAT		Factory Acceptance Test (FAT)	Employee
60	FEI		"FEI Annual Dues" - Financial Executives International (FEI) Financial Executives International (FEI) is a member-service oriented organization based in Morristown, New Jersey for senior-level financial executives in companies in varying sizes, both public and private, and in all industries.	Internet
61	FEMA		The Federal Emergency Management Agency (FEMA) is an agency of the United States Department of Homeland Security.	Internet
62	FERC		Federal Energy Regulatory Commission	Employee
63	FERC DDS		FERC DDS - Federal Energy Regulatory Commission Division of Dam Safety also responsible for/regulates dam security.	Employee
64	FFD		Fitness For Duty	Employee
65	FHR		Flint Hills Resources	Employee
66	FOF		Force On Force exercises.	Employee
67	FPED		Force Protection Equipment Demonstration (nuclear plant security). Equipment to meet current and evolving force protection needs, anti-terrorist requirements, and the demands of an increasingly broad range of other physical security threats and challenges.	Internet
68	FRRB		Fuel Reliability Review Board	Employee
69	FSA		FSA is an acronym for focus self-assessment. Duane Arnold is a Nuclear power plant in Cedar Rapids Iowa.	Employee
70	FSRUG		FSRUG Feedwater System Reliability User's Group - A way for Feedwater System Engineers to connect, share operational experiences, and recommended practices in order to ensure reliable plant operations.	Internet
71	Future State		Future State teams in HR - Talent Mgmt to develop improvement initiatives regarding leadership, performance management, succession planning, culture, assessments, and on boarding.	Employee
72	FWH		"Travel to Pittsburgh to evaluate crack found in FWH @ Holtec Inc." - Feed Water Heater (FWH). Holtec International, a Delaware corporation, is a global turnkey supplier of equipment and systems for the Nuclear, Solar, Geothermal and Fossil Power Generation sectors of the energy industry.	Internet
73	FWSI		BWR (Boiling Water Reactor) Owners' Group (nuclear) Feedwater System Improvement (FWSI)	Internet
74	GCC		GCC - Department of Homeland Security (DHS) Critical Infrastructure Advisory Council (CIPAC) Government Coordinating Council (GCC).	Internet
75	GE7FA Users Group		"GE7FA Users Group - To provide an open forum through conferences and technological aids, to the Owners/Operators of General Electric Frame 7F/7H/9F/9H/6FA generator systems for effective communication, discussion, and information dissemination regarding the operation, maintenance, inspection, troubleshooting, and repair of such systems to maximize equipment performance and reliability.	Internet

76	GPTC	Gas Piping Technology Committee / American Gas Association.		Employee
77	Grede	"""Grede Meeting"" - Grede is Grede Foundries, a Minnesota retail customer located in St Cloud, MN		Employee
78	Hope Creek Benchmarking	"Hope Creek Benchmarking; Industry benchmarking for resolution of red / yellow systems" - U. S. Nuclear Regulatory Commission - Hope Creek Generating Station: Additional benchmarking to establish scale model test (SMT) flow rates more representative of main steam flow speeds at current licensed thermal power (CLTP) and EPU conditions.		Internet
79	HTAC	The HTAC is the US Secretary of Energy's Hydrogen and Fuel Cell Technical Advisory Committee. I was appointed by the Secretary to this Committee several years ago and serve as the only utility representative on the Committee. Many of the issues discussed are of relevance to Xcel Energy and utilities in general (both gas and electric), such as stationary fuel cells in distributed generation applications and hydrogen energy storage for renewables integration applications.		Employee
80	HRBC	HRBC stands for Human Resource Business Consultant. The purpose of HRBC meetings is to bring all HRBC's (assigned to various business areas) together as a staff to discuss updates on ongoing HR initiatives (i.e., MERIT increases, IPAD, etc), upcoming roll out of new / or changes to initiatives or policy changes and focus on continuity in policy interpretation around HR issues across the company.		Employee
81	IECA	International Energy Credit Association. This is an organization which provides training to credit and contract administration professionals in the energy credit industry. These conferences have training sessions reflecting new contract issues impacting the industry, in 2012, this conference focused a lot on Dodd Frank contracting compliance issues.		Employee
82	IEEE	"Industry Dues" - IEEE, pronounced "Eye-triple-E", stands for the Institute of Electrical and Electronics Engineers. IEEE is the world's largest professional association dedicated to advancing technological innovation.		Internet
83	IH	Industrial Hygiene - Corporate Industrial Hygiene Support		Employee
84	ILRT	Prairie Island plant integrated leak rate test (ILRT).		Employee
85	INPO	INPO - The Institute of Nuclear Power Operations promotes excellence in the operation of nuclear electric generating plants.		Internet
86	INPO ATV	INPO Accreditation Team Visit. (ATV)		Internet
87	INPO E&A	INPO E&A and Training Accreditation Auditor.		Internet
88	INPO EAG	INPO - Advisory Group (EAG)		Internet
89	INPO SOER	INPO - SOER 10-2, "Engaged, Thinking Organizations" which says you need to have a "thinking" organization.		Internet
90	IPAD	Individual Performance And Development (IPAD) - Corporate employee performance evaluation reporting and review process.		Employee
91	IPTF	Interconnection Process Task Force		Employee
92	IRC	Investment Review Council		Employee

93	IRWA	IRWA - The International Right of Way Association (IRWA) creates public awareness, trust and confidence in the right of way process. IRWA has united the efforts of its members toward professional development, strong ethics and improved service to employers and the public, along with advancements within the right of way profession. IRWA is the unsurpassed source of right of way educational programs and professional services worldwide. Dedicated exclusively to the right of way profession, IRWA has nearly 10,000 members throughout the U.S. and Canada. Our members are multi-disciplined professionals employed by private industry and government agencies.	Internet
94	ISA	ISA Resources -The International Society of Automation is a nonprofit organization that helps its 30000 worldwide members and other automation professionals	Internet
95	ISCD	ISCD - Department of Homeland Security Chemical (Infrastructure Security Compliance Division) which regulates and enforces security for our Registered (18) and Tiered (2) Chemical Facilities.	Employee
96	JAC	"JAC Meeting" - JAC stands for Joint Apprenticeship Subcommittee, which I am a member representing the Chestnut Hazardous Waste Storage Facility and our Union apprenticeship program.	Employee
97	JTA	JTA - Job and Task Analysis. I was assessing each Operators capability to perform Power System Operations tasks in accordance with NERC Standard PER-005, Requirement 2.	Employee
98	KPI	Key Performance Indicator	Employee
99	KPMG	"KPMG is a global network of professional firms providing Audit, Advisory and Tax services. KPMG's Executive Education Continuing Education for Corporate Executives and their Staffs.	Internet
100	KPMG IFRS	Meet with KPMG regarding International Financial Reporting Standards (IFRS) readiness assessment proposal." KPMG is a global network of professional firms providing Audit, Advisory and Tax services.	Internet
101	LPI	"LPI Meeting" - LPI stands for Liberty Paper Incorporated in Becker, a Minnesota retail electric customer of NSP	Employee
102	LRIWG	Attend the NEI License Renewal Implementation Working Group (LRIWG) meeting in Miami, FL	Internet
103	LRTF	LRTF Meeting supporting license renewal aging management. LRTF stands for (Babcock & Wilcox Owners Group (B&WOG)) License Renewal Task Force	Internet
104	MARC	Mid-America Regulatory Conference	Employee
105	MASMS	"MASMS" - The Minnesota Educational Facilities Management Professionals (also known as MASMS) is a group of over 300 individuals in the area of facilities/grounds/health & safety/operations. The purpose of MASMS is to develop and maintain high standards in the administration, care, operation, planning, budgeting and development of buildings and	Internet

			grounds used by public and non-public educational facilities.	
106		MCT	"MCT" stands for Material Coordination Team, a new team formed under Supply Chain. The main responsibility is ensuring that materials are on time in full for all Substation and Transmission projects prior to construction start. The initiative spans all three OPCO's for coverage and our primary role is coordination of materials from the Supplier/Distributor to the Xcel Energy jobsite and/or Xcel Energy Warehouse for all major Substation and Transmission projects. We are striving for keeping crews working and having the materials at the right time, right place for increased productivity. MCT works with Engineering, Design, Construction, Buyers, Accounts Payable, Project Controls, Sourcing, Suppliers, & Warehousing to accomplish these tasks.	Employee
107		MIPSYCON	"Minnesota Power Systems Conference (MIPSYCON) - provides electric utility engineers and consultants the opportunity to stay abreast of today's power system technology. The conference emphasizes the unique challenges faced by electric utilities in the Midwest. The conference also serves as a forum for power engineers to meet with their colleagues from other utilities to discuss mutual concerns.	Internet
108		MISO	"Midwest Independent System Operator (MISO) is an essential link in the safe, cost-effective delivery of electric power across much of North America. We are committed to reliability, the nondiscriminatory operation of the bulk power transmission system, and to collaborating on creating cost-effective and innovative solutions for our changing industry.	Internet
109		Mk5 Control System training	"Mk5 Control System training in Salem, VA" - GE Energy Technical Training - This course provides training on the essential elements of the Mk V turbine control system. The course will include instruction on the hardware and software components of the Mk V control system and its interface system (HMI). Alarm troubleshooting and LVDT calibration will be central topics of the program.	Internet
110		MNGP	Monticello Nuclear Generating Plant	Employee
111		MNCPA	"acct assn" - Minnesota Society of CPAs	Internet
112		MNOPS	Minnesota Office of Pipeline Safety	Internet
113		MNSEIA	The Minnesota Solar Energy Industries Association (MnSEIA) represents and serves Minnesota energy professionals and solar energy users.	Internet
114		MP	Marquette Plaza office - Minneapolis	Employee
115		MRM	Management Review Meeting - these meetings are conducted to discuss process and expenditure changes that are made by the site management are subsequently reviewed by corporate management to ensure alignment with the Company's business goals.	Employee
116		NAEMA	The North American Energy Markets Association (NAEMA) is an independent, nonprofit trade	Internet

		association representing entities involved in the buying and selling (marketing) of energy or in providing services to the energy industry.	
117	NAPCO	North American Power Credit Organization	Employee
118	NARUC	"National Association of Regulatory Commissioners (NARUC) is the national association representing the State Public Service Commissioners who regulate essential utility services in your State. NARUC members are responsible for assuring reliable utility service at fair, just, and reasonable rates.	Internet
119	NDE	Non-destructive examinations	Employee
120	NEI / NEA	"The Nuclear Energy Institute (NEI) is the policy organization of the nuclear energy and technologies industry and participates in both the national and global policy-making process. NEI's objective is to ensure the formation of policies that promote the beneficial uses of nuclear energy and technologies in the United States and around the world. The Nuclear Energy Agency (NEA) is a specialized agency within the Organization for Economic Co-operation and Development (OECD), an intergovernmental organization of industrialized countries, based in Paris, France.	Internet
121	NEIL	Nuclear Electric Insurance Limited (NEIL) - The Company insures electric utilities for damages to insured sites, decontamination expenses incurred at such sites arising from nuclear contamination, other risks of direct physical loss at such sites, certain premature decommissioning costs, and the costs associated with certain long-term interruptions of electricity supply.	Internet
122	NERC	NERC "North American Reliability Corporation" who are the regulators overseeing the FERC mandated reliability standards.	Employee
123	NESCSL	Nuclear Energy Supply Chain Strategic Leadership	Employee
124	NFPA	"Codes" - National Fire Protection Association (NFPA) - The world's leading advocate of fire prevention and an authoritative source on public safety, NFPA develops, publishes, and disseminates more than 300 consensus codes and standards intended to minimize the possibility and effects of fire and other risks.	Internet
125	NICET	"License" - National Institute for Certification in Engineering Technologies (NICET) defines engineering technicians as the "hands-on" members of the engineering team who work under the direction of engineers, scientists, and technologists. More than 125,000 technicians and technologists have met NICET's rigorous certification criteria, and the number grows rapidly as more employers and local and state governments rely on NICET certification to measure the qualifications of their workforce.	Internet
126	NIEP	Nuclear Industry Evaluation Program (NIEP) - Insights to influence performance excellence at operating nuclear power plants.	Internet
127	NNSC	The National Nuclear Security Conference is an opportunity for	Internet

			security professionals to gather, exchange ideas and participate in discussions on the latest industry and Nuclear Regulatory Commission trends.	
128		NRA	"NRA" - The National Rifle Association (PI FOF and Range/Training Items)	Employee
129		NRC	The Nuclear Regulatory Commission	Internet
130		NRC RIC	NRC - Regulatory Information Conference (RIC)	Internet
131		NRRPT	"NRRPT Annual Dues" - The National Registry of Radiation Protection Technologists (NRRPT)	Internet
132		NSCA	Nuclear Safety Culture Assessment (NSCA) - All operating nuclear power plants strive to receive the coveted INPO "Excellent" rating on their evaluations; therefore, when the organization released the Principles for a Strong Nuclear Safety Culture in late 2004, nuclear power plant owners took notice. The Utilities Services Alliance Inc. (USA) responded to the INPO document and focused on ensuring its member plants operate in what it calls a "Strong Nuclear Safety Culture." USA developed the Nuclear Safety Culture Assessment (NSCA) process tool. The tool's purpose is to evaluate an organization's overall safety culture and provide an early warning of areas where that culture could be beginning to erode. The tool is a formal mechanism that judges plant personnel's behaviors to ensure they maintain the appropriate focus on nuclear safety.	Internet
133		Nuclear AA/FFD	Nuclear Access Authorization (AA) - The licensee for each nuclear power plant licensed under 10 CFR Part 50 is required to develop, implement, and maintain an Access Authorization (AA) program to protect against an insider threat at the plant. Fitness For Duty (FFD) - implementation of 10 CFR Part 26 Fitness for Duty Program requirements.	Internet
134		NUCC	Nuclear Utility Coatings Council	Employee
135		NWSC	Nuclear Waste Strategy Coalition	Employee
136		ODL	Outdoor Lighting - Distribution Operations	Employee
137		OH	Overhead Electric Service Lines - Distribution Operations	Employee
138		PAC	PAC stands for "Program Advisory Committee". This acronym is used by Energy Supply and Nuclear Generation employees. These are quarterly training meetings. The maintenance programs that require these meetings are I&C, Electrical and Mechanical.	Employee
139		PACT	PACT is the Professional Association of Computer Trainers.	Employee
140		PBAPS	"Traveled to PBAPS in Delta, Pa to walk down their RP Remote Monitoring Camera system." - Peach Bottom Atomic Power Station (PBAPS) is a two-unit nuclear generation facility located on the west bank of the Conowingo Pond (Susquehanna River) in Delta, Pennsylvania.	Internet
141		PINGP	Prairie Island Nuclear Generating Plant-PINGP	Employee
142		PM	Project Manager	Employee
143		PMI	Project Management Institute	Employee
144		PowerPlan	"Work with PowerPlan in Denver" - PowerPlan's business performance management (BPM) solution provides	Internet

			powerful budgeting, in-depth analysis, and flexible reporting features that replace spreadsheets and cumbersome, error-prone tools.	
145		PRA	Probabilitistic Risk Assessment (PRA) Modification	Employee
146		PRDIG	Pressure Relief Device Interest Group (PRDIG)	Employee
147		PTL	"PTL Meeting at Wilmarth" - PTL is short for "Pathway to Leadership" and the meeting was at the Wilmarth power plant. Pathway to Leadership is a program Xcel Energy has initiated to identify and develop future leaders for the company in a mentoring intense setting. In this program, members of our mentoring group visited a small Refuse Derived Fuel (RDF) power electrical generating facility and had our monthly meeting on site. The topic was on Trust in the Workplace.	Employee
148		PTT	Productivity Through Technology (PTT) is a commitment to uncover innovative solutions to employees' work challenges. We are evaluating technologies that can streamline, simplify, and improve work processes throughout the Operations and Nuclear organizations.	Internet
149		PWG	"THIS IS PSCo: PWG stands for Performance work group, it's part of WECC Western Electric coordinating council which PSCO is a part of the interconnection (www.wecc.biz) I am on the PWG group which helps define standards for WECC and NERC and assists with compliance of members."	Employee
150		PWR Owners Group	Pressurized Water Reactor (PWR) Owners Group (nuclear)	Internet
151		PWROG	"Pressurized Water Reactor Owners Group - Nuclear - Attend the PWROG Meeting	Internet
152		Quad FBM	Formal Benchmark of Quad Cities Nuclear Generating Station.	Employee
153		RDF	RDF - Renewable Development Fund	Employee
154		RFP FAT	Request For Proposal (RFP)	Employee
155		REC	Renewable Energy Credits	Employee
156		RIC	U.S. Nuclear Regulatory Commission's (USNRC's) Regulatory Information Conference (RIC)	Internet
157		RIMS	Risk Management & Insurance Society	Internet
158		River Bend	"""Benchmark trip to River Bend"" - River Bend Nuclear Generating Station is a nuclear power station on a 3,300-acre (13 km2) site near St. Francisville, Louisiana, approximately 30 miles (50 km) north of Baton Rouge. The plant has a General Electric 978 MW[1] boiling water reactor, which began operation on June 16, 1986. River Bend is operated by Entergy Nuclear and owned by Entergy Gulf States, Inc.	Internet
159		RMEL	RMEL is a not-for-profit energy trade association that has served the electric utility industry with a variety of education and networking services since 1903. Dedicated to fostering a thriving community of electric energy professionals, RMEL's 300 corporate members share ideas, techniques and programs to better serve the industry and its customers. Once known as the Rocky Mountain Electrical League.	Internet
160		RPC	"NSP Plant Visit, NSP Directors' and NSP RPC attendance" - RPC is the "Regional Project Committee" capital project meeting. Committee meets to	Employee

			review Energy Supply's ongoing & future capital projects.	
161		RPS	RPS - Renewable Portfolio Standard (RPS).	Employee
162		RSC	"RSC" stands for Regional Safety Committee. Each of our power plants in the MN/WI region has a safety committee. The RSC is composed of one or two members from each of our region's plant safety committees (approx. 25 people). The RSC works on safety issues/initiatives at a regional level.	Employee
163		RTC	Riverside Training Center (Riverside generation plant)	Employee
164		S3	Sherco Generation Plant - Unit #3	Employee
165		SACC Job Fair	Registration fee for the Washington, D.C. SACC Job Fair"" - Service Academy Career Conference (SACC) Job Fair: Recruiting for: Engineers, Pilots, Program Managers, Business and Cost Analysts etc. This was a job fair for Service Academy alumni/veterans. The purpose of attending this job fair was to support military hiring at Xcel Energy and recruit Service Academy alumni/veterans for opportunities at Xcel Energy; these types of new hires, with specialized training, add immediate value to an organization. The registration fee was a flat rate; however, we did have 3 employees attend to recruit at this event.	Employee
166		SAG	Safety Advisory Group (SAG). Each geographical work area has a field employee assigned as a member to the Safety Advisory Group (SAG). These groups meet regionally monthly and jointly on a quarterly base to proactively seek solution to safety concerns and enhance workplace safety.	Employee
167		SAGE	Supportive Association for Gay, Lesbian, Bi-Sexual, Transgender, Ally Employees	Employee
168		SAS	"SAS is the leader in business analytics software and services and the largest independent vendor in the business intelligence market.	Internet
169		SAWG	"Supply adequacy working group	
170		SC	Supply Chain department.	Employee
171		SCC	SCC - Department of Homeland Security (DHS) Critical Infrastructure Advisory Council (CIPAC) Dams Sector Coordinating Council (DSCC). This is the Private Sector Dam Owner and Operator Coordinating Council.	Employee
172		SCCIA	SCCIA promotes the formation and growth of captive insurance programs. Captive insurance programs are a valuable tool for many corporate entities looking for a better way to manage risk.	Internet
173		SCLT	SCLT stands for "Supply Chain Leadership Team" meeting where all direct reports gather to plan the department budget, plan our projects and initiatives, safety programs, training and address critical operating requirements for the upcoming year. Since all of us have employees in all regions it is critical we are consistent and aligned with each region's operating priorities.	Employee
174		SCSU	St. Cloud Minnesota State University	Employee
175		SDG&E	San Diego Gas & Electric - a Sempra Energy utility.	Internet

176	SFDC	SFDC - SalesForce.Com. The meetings were to set the requirements for our new CRM (customer relationship management) software.		Employee
177	SFPE	Society of Fire Protection Engineers		Employee
178	SGA	Southern Gas Association - a 501 (c)(6) organization. Serves members who conduct business in the following sectors of the natural gas industry: Distribution, Transmission (pipeline) and Gas Supply Marketing. Produces events and manages joint industry projects, conducts surveys on business critical issues, and facilitates peer-to-peer collaboration for the purpose of identifying and implementing best practices.		Internet
179	SGMP TAG	Steam generator management program technical advisory group		Employee
180	SGS	SGS is the world's leading inspection, verification, testing and certification company. The Company was first registered in Geneva as Société Générale de Surveillance in 1919.		Internet
181	SHC	Sherco Fossil Plant.		Employee
182	SIM	SIM - Strategic Initiative Meeting		Employee
183	SHRM	"SHRM" - The Society for Human Resource Management (SHRM) is the world's largest association devoted to human resource management. Representing more than 250,000 members in over 140 countries, the Society serves the needs of HR professionals and advances the interests of the HR profession.		Internet
184	SISW	Safety Intervention and Stop Work training. This was required training. The training was required to be completed in a specific time frame so travel was required to the sites where the employees were working.		Employee
185	Skire Unifier Software	Skire's Unifier (software) offers an agile, web-based, collaborative solution for organizations looking to manage, maintain and optimize their property portfolio, facilities and capital assets.		Internet
186	S&T	Safety and Training department		Employee
187	SL&R	Siting and Land Rights department.		Employee
188	SLT	Senior Leadership Team		Employee
189	SME	"Travel for meetings in order to transition from SME to Sub Syst Perf department" - SME stands for Substation Maintenance Engineering		Employee
190	Sox	Sarbanes-Oxley (SOx) - The Sarbanes–Oxley Act of 2002, or SOX, is a United States federal law that set new or enhanced standards for all U.S. public company boards, management and public accounting firms.		Internet
191	SPP	Southwest Power Pool Electric Energy Network		Internet
192	Star Achievement Certification	Star Achievement Certification Part III"" (training) - Star Achievement Certification: The Star Achievement Series® is a training program developed by the Founder and CEO of Office Dynamics, Ltd, Joan Burge. Joan is an author and national corporate trainer with over 25 years of experience in the administrative and training profession. The philosophy behind Star Achievement® is that it takes a combination of skills, attitude, teamwork and strategies to stay on the cutting edge.		Employee
193	STEP	STEP - Success Through Employee Participation employee development program		Employee

194	SUG	The Settlement User Group shall be utilized to develop recommendations related to financial settlements of Energy Market activities administered by SPP.		Internet
195	SWG	"SWG Meeting" - SWG stands for Security Working Group. It is a group of utility security professionals, NEI (Nuclear Energy Institute) and NRC folks.		Employee
196	Taleo	The Oracle Taleo Cloud Service enables enterprises and midsize businesses to recruit top talent, align that talent to key goals, manage performance, develop and compensate top performers, and turn today's best performers into tomorrow's leaders.		Internet
197	TAPS	TAPS - Travel and Procurement System. The new SumTotal application includes functionality to require users to upload scanned images of required receipts and attach them to their expense report systematically.		Employee
198	TLP	TLP - Transmission's Transmission Line Performance department		Employee
199	TM	TM - Human Resources' Talent Management department		Employee
200	TMI	TMI - Three Mile Island nuclear generation plant		Employee
201	TRO	TRO stands for Transmission Resource Optimization. The substation group although in the transmission business unit actually works on both transmission and distribution substation assets.		Employee
202	True North	"True North Membership Dues" - True North Consulting is an Engineering Services company specializing in support for the electric power industry. Founded in 1999, True North has provided engineering based consulting services to the majority of US utilities and to several abroad.		Internet
203	TSPS	TSPS - Transmission & Substation Performance and Standards.		Employee
204	TSS	TSS - Transmission and Substation Standards		Employee
205	TW	Towers Watson Vendor - a leading global professional services company that helps organizations improve performance through effective people, risk and financial management, offering solutions in the areas of benefits, talent management, rewards, and risk and capital management.		Internet
206	UCMDB	UCMDB is Universal Configuration Management Data Base. It's a system that tracks, records, and correlates hardware and software throughout the company. We are implementing the uCMDB for monitoring and controlling assets and asset interactions across the company.		Employee
207	UFLS	Under Frequency Load Shed - Distribution Electric Engineering program		Employee
208	UG	Under Ground systems		Employee
209	UHC	United Healthcare vendor - Health insurance and medical care options for employer groups.		Internet
210	UI	Utilities International, Inc. vendor - Utilities International's UIPlanner software is designed specifically for utilities. UIPlanner is now the leading financial planning software within the utility industry.		Internet

211	USA	Utilities Service Alliance (USA) is a not-for-profit cooperative designed to facilitate collaboration among its member utilities. Together, we work to reduce operating and maintenance costs, improve safety and performance, and provide innovation and leadership within the nuclear power industry.		Internet
212	USUG	Utility Simulator Users Group - "Simulator Supervision MNGP ILT, NRC Exam Post Exam Activities, ANSI/ANS-3.5 Committee Meeting		Internet
213	USSD	FERC - United States Society on Dams		Internet
214	USWAG	Utility Solid Waste Activities Group - USWAG provides the most comprehensive, knowledgeable and experienced legal and technical resources on utility solid waste management issues available.		Internet
215	UVIG	Utility Variable-Generation Integration Group - The UVIG Board of Directors officially voted to change our name from the Utility Wind Integration Group (UWIG) to the Utility Variable-Generation Integration Group at the board meeting in Maui last October. The change was driven by requests from our members facing rapid growth from solar generation.		Internet
216	UWIG	Utility Variable-Generation Integration Group - The UVIG Board of Directors officially voted to change our name from the Utility Wind Integration Group (UWIG) to the Utility Variable-Generation Integration Group at the board meeting in Maui last October. The change was driven by requests from our members facing rapid growth from solar generation.		Internet
217	Ventyx	Ventyx, an ABB company, is the world's leading supplier of enterprise software and services for essential industries such as energy, mining, and public infrastructure.		Internet
218	VOC	VOC is an internal abbreviation for Voice of the Customer, an ongoing tracking market research study of customer perceptions of Xcel Energy. Focus groups were held to provide direction for the online portion of the work now underway.		Employee
219	VOIP	VOIP - Voice Over Internet Protocol		Employee
220	WAPA	Western Area Power Administration		Internet
221	WECC	The Western Electricity Coordinating Council (WECC) is the Regional Entity responsible for coordinating and promoting Bulk Electric System reliability in the Western Interconnection.		Internet
222	WFC	WFC - Human Resources Workforce Strategy department's "Work Force Council"		Employee
223	WFP	"WFP is "Work Force Planning", which is a major ongoing Corporate HR and Operations initiative to make sure our staffing is "right-sized", with the right number and mix of employee grades and skill sets for the future. Also part of this is developing short- and long-term plans to prepare the Company for employee retirements and the associated loss of institutional knowledge.		Employee
224	WFR	WFR - Human Resources' Safety & "Work Force Relations" department		Employee
225	WICF	"The Western Interconnection Compliance Forum (WICF) has emerged as a dynamic information		Internet

		sharing organization within the Western Interconnection. It is run by and on behalf of entities subject to WECC and NERC compliance requirements."		
226	WIL	WIL - "Women in Leadership" is an industry professional organization		Employee
227	WIN	WIN - "Women's Interest Network" which is an Xcel Energy employee network group. Our team often supports various employee events they hold to develop their members (Xcel Energy employees), focused on career development, competencies and interviewing skills.		Employee
228	WSPP	Western Systems Power Pool (WSPP) is an agreement and an organization that creates power trading opportunities and allows WSPP members to manage power delivery and price risk. The Current WSPP Agreement effective April 23, 2012, updated July 12, 2012, is the most commonly used standardized power sales contract in the electric industry. It is approved by the FERC and used by jurisdictional and non-jurisdictional entities.		Internet
229	WUA	Wisconsin Utilities Association		Internet

Table 4 - TIME Earnings Codes

Earning Code Group	Earning Code Desc
Per Diem-Related	Per Diem Rptg - T/R
	Per Diem Overnite -
	Per Diem Overnite Tx
Meal-Related	Overtime Meal Taxabl
	Taxable Meal
	Meal Non-Taxable
Mileage-Related	Casual Use Mileage
	Zone Mileage
Allowance-Related	BA Site Allowance
Other	Specl Responder Fee
	Location Pay

Fleet Capital Additions

Fleet, Tools, & Equipment - Capital Additions
State of MN Gas Jurisdiction
Includes AFUDC

Capital Budget Groups	Func Class Descr	WBS Level 2	Description	2024
Asset Replacements	Gas General Plant	A.0006056.001	MN-Dist Fleet New Unit Purchase Gas	1,589,445
Asset Replacements	Common General Plant	A.0006056.003	MN-Dist Fleet New Unit Purchase Com	47,166
Asset Replacements	Common General Plant	A.0006056.206	MN-Dist Fleet New Unit Purchase Com	16,434
Asset Replacements	Common General Plant	A.0006056.254	Fleet-PHEV-NSPM > $50K COMMON	4,826
Asset Replacements	Common General Plant	A.0006056.288	Fleet-PHEV-NSPM Dist < $50K COMMON	2,597
Asset Replacements	Gas General Plant	A.0006056.354	NSPM PHEV >$50K Gas	70,683
Asset Replacements	Gas General Plant	A.0006056.204	MN-Gas Op Fleet New Unit Purchase <	96,882
Asset Replacements	Gas General Plant	A.0006056.217	ND-Dist Fleet New Unit Purchase Gas	139,572
Asset Replacements	Common General Plant	A.0006056.291	Fleet-PHEV-NSPM-ND-Dist COMMON	2,534
Asset Replacements	Gas General Plant	A.0006056.328	Fleet-PHEV-ND GAS	79,519
Asset Additions	Common General Plant	A.0006056.365	MN-Dist ADD Unit Purchase Common >	56,526
Asset Additions	Gas General Plant	A.0006056.371	MN-Dist Fleet ADD Purchace Gas >$50	1,120,331
Fueling	Common General Plant	A.0001996.001	NSPM Fleet Charging Stations	154,755
Repairs	Gas General Plant	A.0006056.204	MN-Gas Op Fleet New Unit Purchase <	13,000
Tools	Common General Plant	A.0006059.551	NSPM-WHSE Cap Tools & Equipment	18,098
Tools	Common General Plant	A.0001727.005	COS-CAP-UAS-NSPM-TOOLS Common	101
Tools	Common General Plant	A.0006056.246	MN - Dist Fleet Transp Tools Common	134,680
Tools	Common General Plant	A.0001727.001	COS-CAP-UAS-NSPM-Common	3,016
Grand Total				**$ 3,550,165**
			Control totals from Table 4	$ 3,550
				$ 3,550