

November 30, 2023

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

**RE: Letter of the Minnesota Department of Commerce, Division of Energy Resources
Northern States Power Company’s Transmission Cost Recovery Rider
Docket No. E002/M-23-467**

Dear Mr. Seuffert:

On October 31, 2023, Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) filed a petition in Docket No. E002/M-23-467, requesting the Minnesota Public Utilities Commission (Commission) approve Xcel’s 2023-2024 Transmission Cost Recovery (TCR) Rider revenue requirements and the resulting adjustment factors by customer class (Petition). Xcel’s proposal would reduce the TCR factor by category, as shown in Table 1 below, effective January 1, 2024.

Table 1: Adjustment Factor Comparison¹

	2022 Implemented	2024 Proposed
Total Revenue Requirements	\$104,536,270	\$62,708,031
Residential Rate/kWh	\$0.005856	\$0.005474
Commercial Non-Demand/kWh	\$0.004602	\$0.003634
Demand/kW	\$1.095	\$0.240
Critical Peak Price TOU pilot/kWh	N/A	\$0.000625

Xcel stated the January 1, 2024 implementation date would coincide with the implementation of final base rates in Docket No. E002/GR-21-630.² Xcel proposes to provisionally implement this TCR adjustment factor reduction if it is not possible for the full TCR rider petition to be approved by that time.

¹ Petition, page 12.

² Petition, page 2.

As shown above in Table 1, the Department notes that the total TCR revenue requirements have decreased significantly from \$104.5 million to \$62.7 million while the residential rate only decreases from \$0.005856 to \$0.005474. As a result, the Department reached out to Xcel for an explanation. According to the Company, the reason for the smaller residential rate decrease is due to changes in the types of assets (more distribution assets than transmission assets) included the TCR Rider and their respective allocators in the rate case, which attributes more of the costs to residential customers than previous TCR Riders.³ Based on our review, the Department concludes Xcel's explanation appears reasonable.

Having completed an initial review of Xcel's Petition, the Department believes full Department review and Commission approval is unlikely by January 1, 2024. Of note, this year's petition introduces new projects and new issues.⁴ Further, the Department does not want to delay implementation of the rate change given it is a reduction, which primarily reflects the 2024 roll-in of many prior TCR rider projects into base rates.⁵

The Department therefore recommends the Commission approve Xcel's requested provisional rate reduction to be implemented on January 1, 2024, subject to future update.

The Department is still reviewing Xcel's Petition and will submit full comments regarding Xcel's petition on May 31, 2024, as established by the Commission's *Notice of Comment Period* issued on November 22, 2023.

Under Minnesota Rules 7829.1050, the Commission may act on uncontested proceedings through its consent calendar if a proceeding presents no disputed or novel issues. This docket does not address any novel or disputed issues; therefore, the Department recommends approval through the Commission's consent calendar.

The Department is available to answer any questions the Commission may have in this matter.

Sincerely,

/s/ LOUISE MILTICH
Assistant Commissioner of Regulatory Analysis

/s/ MICHAEL BOLOGNA
Financial Analyst

MB/ar

³ Per Xcel's response provided on November 28, 2023 to Department email.

⁴ Petition, pages 7-10.

⁵ Petition page 5. On October 17, 2023, Xcel filed its final rate case compliance for its recently completed rate case in Docket No. E002/GR-21-630. For TCR rider projects CapX2020 La Crosse projects, CapX2020 Brookings, CapX2020 Fargo, Big Stone–Brookings, La Crosse-Madison and Huntley-Wilmar, Xcel proposed to move recovery from the TCR Rider to base rates with implementation of final rates. The Company proposed to continue recovery of the ADMS and to begin recovery of the AMI, FAN, TOU Pilot and LoadSeer in the TCR Rider.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Letter**

Docket No. E002/M-23-467

Dated this **30th** day of **November 2023**

/s/Sharon Ferguson

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