



414 Nicollet Mall
Minneapolis, MN 55401

October 10, 2024

—Via Electronic Filing—

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

Re: LETTER – UPDATED ELECTRIC CIP ADJUSTMENT FACTOR
PETITION FOR APPROVAL OF AN ELECTRIC CONSERVATION IMPROVEMENT
PROGRAM ADJUSTMENT FACTOR
DOCKET NO. E002/M-24-50

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Letter updating the Proposed 2024/2025 Electric CIP Adjustment Factor submitted on April 1, 2024 (April 2024 Proposal).

The current DSM Electric Tracker looks different than in many years past as a result of the Conservation Cost Recovery Charge (CCRC) approved in our 2021 Electric Rate Case.¹ As provided in our April 2024 Proposal, the DSM Electric Tracker shows an increase in the CCRC, which caused the CIP Adjustment Factor to decrease and approach \$0.00 per kWh. The CCRC resets the amounts recovered in base rates to fund ongoing CIP activities while the CIP Adjustment Factor is the mechanism that ensures, between rate cases, that the Company can recover differences between CCRC revenues and actual expenditures. It is anticipated that future CIP Adjustment Factors will increase as CIP expenditures increase.

The Minnesota Department of Commerce, Division of Energy Resources (Department) recommended approval of our April 2024 Proposal of \$0.000207 in their Comments submitted on July 1, 2024.

¹ See, Findings of Fact, Conclusions, and Order, Minnesota Public Utilities Commission, Docket No. E002/GR-21-630, July 17, 2023. The Conservation Cost Recovery Charge rate is updated from \$3.133/MWh to \$4.955/MWh effective January 1, 2024.

Typically, the Company would update the CIP Adjustment Factor after Commission approval through a Compliance Filing with a revised charge. However, given the already apparent impacts of the Electric Rate Case and lower than expected spending levels in 2024, we are requesting a change prior to Commission approval. Specifically, we are requesting to lower the 2024/2025 Electric CIP Adjustment Factor to a negative charge of \$(0.000389), to reduce the over-recovery of the tracker.

Updated Electric CIP Adjustment Factor

We provide as Attachment A, an update of the electric DSM Cost Recovery and Incentive Mechanism Tracker and Balance. The update includes three adjustments the Company historically makes for accuracy of our future trackers. We describe these below:

- 1) The 2024 Tracker has been updated with Actual Spend and CIP Adjustment Factor Recovery through September 2024.
- 2) The 2023 Performance incentive accrual has been moved to November 2024.
- 3) The resulting CIP Tracker Rate has been updated beginning on December 1, 2024.

As a result of these adjustments, the resulting factor has decreased from our April 2024 Proposal from \$0.000207 per kilowatt-hour (kWh) to negative \$(0.000389) per kilowatt-hour.

Updated Tariff Sheet

We provide as Attachment B to this filing, an updated compliance tariff sheet for our Electric Rate Book, in redline and final format, to reflect this proposed change as follows:

Minnesota Electric Rate Book—MPUC No. 2

Sheet No. 5-92, revision 25

Updated Customer Bill Message

The following bill message will alert our electric customers to the updated CIP Adjustment Factor:

Effective December 1, 2024, the Resource Adjustment line item on your bill has reduced due to a change in the Conservation Improvement Program (CIP) factor. The electric CIP portion of the Resource Adjustment is \$(0.000389) per kilowatt-hour (kWh).

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served to the parties on the attached service list. If you have any questions regarding this filing, please contact Angela Smelser at 612-370-3447 or angela.r.smelser@xcelenergy.com.

Sincerely,

/s/

JESSICA PETERSON
MANAGER, PRODUCT POLICY

Enclosures
cc: Service Lists

Northern States Power Company, a Minnesota corporation
State of Minnesota- Electric Utility
DSM Cost Recovery & Incentive Mechanism - Total
2024 Forecast

	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u>Oct</u>	<u>Nov</u>	<u>Dec</u>	<u>Annual</u>
<u>EXPENSES</u>	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Actual	Forecast	Forecast	Forecast	
1. Balance	(22,036,468)	(32,726,717)	(40,426,009)	(46,796,756)	(50,328,960)	(53,963,740)	(60,371,607)	(67,220,244)	(72,242,333)	(77,224,987)	(79,420,213)	(53,228,666)	(36,606,082)
1a. Other Adjustments	1,154,250												
2. CIP Program Expenditures	4,619,363	6,732,161	8,623,154	10,047,204	11,265,586	9,747,918	12,089,677	13,187,829	11,841,507	13,013,990	14,315,117	27,045,433	142,528,940
3. 2023 Performance Incentive											26,478,641		26,478,641
4. Total Expenses + Incentive (Line 1b + 2 + 3)	(16,262,855)	(25,994,556)	(31,802,855)	(36,749,552)	(39,063,374)	(44,215,821)	(48,281,930)	(54,032,416)	(60,400,826)	(64,210,997)	(38,626,456)	(26,183,233)	132,401,499
<u>RECOVERY</u>													
5. CCRC Rate (\$/MWh)	4.955	4.955	4.955	4.955	4.955	4.955	4.955	4.955	4.955	4.955	4.955	4.955	
6. CCRC Cost Recovery (CCRC times Sales)	11,368,450	9,891,710	10,269,177	9,287,112	10,192,640	11,048,300	12,957,099	12,446,022	11,481,361	10,363,197	9,988,109	11,214,530	130,507,708
7. CIP Adjustment Factor Rate (\$/MWh)	2.225	2.225	2.225	2.225	2.225	2.225	2.225	2.225	2.225	2.225	2.225		(0.389)
8. CIP Adjustment Factor Recovery (Factor times Sales)	5,016,083	4,441,750	4,611,288	4,170,298	4,576,917	4,961,144	5,818,273	5,588,779	5,155,606	4,653,504	4,485,074	(880,414)	52,598,302
9. Sub-Balance (Line 4 - 6 - 8)	(32,647,387)	(40,328,016)	(46,683,320)	(50,206,962)	(53,832,931)	(60,225,266)	(67,057,302)	(72,067,217)	(77,037,793)	(79,227,698)	(53,099,640)	(36,517,348)	
10. Accum Deferred Tax (Line 9 * 28.742%)	(9,383,512)	(11,591,078)	(13,417,720)	(14,430,485)	(15,472,661)	(17,309,946)	(19,273,610)	(20,713,559)	(22,142,202)	(22,771,625)	(15,261,898)	(10,495,816)	
11. Net Investment (Line 9 - 10)	(23,263,875)	(28,736,938)	(33,265,600)	(35,776,477)	(38,360,270)	(42,915,320)	(47,783,692)	(51,353,658)	(54,895,591)	(56,456,073)	(37,837,742)	(26,021,532)	
12. Carrying Charge (Line 11 * Carrying Charge Rate)	(79,330)	(97,993)	(113,436)	(121,998)	(130,809)	(146,341)	(162,942)	(175,116)	(187,194)	(192,515)	(129,027)	(88,733)	(1,625,434)
13. End of Month Balance (Line 9 + 12)	(32,726,717)	(40,426,009)	(46,796,756)	(50,328,960)	(53,963,740)	(60,371,607)	(67,220,244)	(72,242,333)	(77,224,987)	(79,420,213)	(53,228,666)	(36,606,082)	

Table 37: 2024 Electric CIP Tracker Forecast, With Cost Recovery in 2024

Northern States Power Company, a Minnesota corporation
State of Minnesota- Electric Utility
DSM Cost Recovery & Incentive Mechanism - Total
2025 Forecast

	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	
<u>EXPENSES</u>	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	Forecast	
1. Balance	(36,606,082)	(37,474,148)	(36,922,806)	(36,801,298)	(34,819,399)	(33,688,190)	(31,421,878)	(32,042,688)	(30,439,828)	
2. CIP Program Expenditures	9,944,387	9,839,113	10,366,329	10,453,027	10,642,624	13,051,005	12,070,542	13,652,391	15,917,768	
3. 2024 Performance Incentive									24,408,684	
4. Total Expenses + Incentive (Line 1 + 2 + 3)	(26,661,695)	(27,635,035)	(26,556,477)	(26,348,271)	(24,176,776)	(20,637,185)	(19,351,336)	(18,390,297)	9,886,625	
<u>RECOVERY</u>										
5. CCRC Rate (\$/MWh)	4.955	4.955	4.955	4.955	4.955	4.955	4.955	4.955	4.955	
6. CCRC Cost Recovery (CCRC times Sales)	11,635,042	9,981,916	11,020,821	9,101,232	10,233,121	11,620,838	13,688,301	12,996,017	10,715,114	
7. CIP Adjustment Factor Rate (\$/MWh)	(\$0.389)	(\$0.389)	(\$0.389)	(\$0.389)	(\$0.389)	(\$0.389)	(\$0.389)	(\$0.389)	(\$0.389)	
8. CIP Adjustment Factor Recovery (Factor times Sales)	(913,427)	(783,646)	(865,207)	(714,506)	(803,367)	(912,312)	(1,074,621)	(1,020,273)	(841,207)	
9. Sub-Balance (Line 4 - 6 - 8)	(37,383,310)	(36,833,305)	(36,712,091)	(34,734,997)	(33,606,530)	(31,345,711)	(31,965,016)	(30,366,041)	12,717	
10. Accum Deferred Tax (Line 9 * 28.742%)	(10,744,711)	(10,586,628)	(10,551,789)	(9,983,533)	(9,659,189)	(9,009,384)	(9,187,385)	(8,727,808)	3,655	
11. Net Investment (Line 9 - 10)	(26,638,599)	(26,246,676)	(26,160,302)	(24,751,464)	(23,947,341)	(22,336,327)	(22,777,631)	(21,638,234)	9,062	
12. Carrying Charge (Line 11 * Carrying Charge Rate)	(90,838)	(89,501)	(89,207)	(84,402)	(81,660)	(76,167)	(77,672)	(73,786)	31	
13. End of Month Balance (Line 9 + 12)	(37,474,148)	(36,922,806)	(36,801,298)	(34,819,399)	(33,688,190)	(31,421,878)	(32,042,688)	(30,439,828)	12,748	

Table 38. 2025 Electric CIP Tracker Forecast, With Cost Recovery in 2025

Redline

**CONSERVATION IMPROVEMENT PROGRAM
ADJUSTMENT RIDER**

Section No. 5
~~24th~~^{25th} Revised Sheet No. 92

APPLICABILITY

Applicable to bills for electric service provided under the Company's retail rate schedules. Exemptions are as follows:

"Large Customer Facility" customers that have been exempted from the Company's Conservation Improvement Program charges pursuant to Minn. Stat. 216B.241 subd. 1a (b) shall receive a monthly exemption from conservation improvement program charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from conservation program charges, the "Large Customer Facility" customers can no longer participate in the Company's Energy Conservation Improvement Program.

RIDER

There shall be included on each non-exempt customer's monthly bill a Conservation Improvement Program (CIP) Adjustment, which shall be calculated by multiplying the monthly applicable billing kilowatt hours (kWh) by the CIP Adjustment Factor.

DETERMINATION OF CONSERVATION IMPROVEMENT PROGRAM ADJUSTMENT FACTOR

The CIP Adjustment Factor shall be calculated for each customer class by dividing the Recoverable Conservation Improvement Program Expense by the Projected Retail Sales for a designated recovery period. The factor may be adjusted annually with approval of the Minnesota Public Utilities Commission. The CIP Adjustment Factor for all rate schedules is:

All Classes ~~\$0.002225~~^{0.000389} per kWh

R

Recoverable Conservation Improvement Program Expense shall be the CIP expense not recovered through base rates as determined from the CIP Tracker account balance for a designated period. All costs appropriately charged to the CIP Tracker Account shall be eligible for recovery through this Rider. All revenues received from the CIP Adjustment Factor shall be credited to the CIP Tracker Account.

Projected Retail Sales shall be the estimated kilowatt-hour sales to all non-exempt customers for the designated recovery period.

(Continued on Sheet No. 5-92.1)

Date Filed: ~~03-31-23~~¹⁰⁻¹⁰⁻²⁴ By: ~~Christopher B. Clark~~^{Ryan J. Long} Effective Date: ~~10-01-23~~
President, Northern States Power Company, a Minnesota corporation
Docket No. E002/M-~~23-145~~²⁴⁻⁵⁰ Order Date: ~~07-21-23~~

Clean

**CONSERVATION IMPROVEMENT PROGRAM
ADJUSTMENT RIDER**

Section No. 5
25th Revised Sheet No. 92

APPLICABILITY

Applicable to bills for electric service provided under the Company's retail rate schedules. Exemptions are as follows:

"Large Customer Facility" customers that have been exempted from the Company's Conservation Improvement Program charges pursuant to Minn. Stat. 216B.241 subd. 1a (b) shall receive a monthly exemption from conservation improvement program charges pursuant to Minn. Stat. 216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from conservation program charges, the "Large Customer Facility" customers can no longer participate in the Company's Energy Conservation Improvement Program.

RIDER

There shall be included on each non-exempt customer's monthly bill a Conservation Improvement Program (CIP) Adjustment, which shall be calculated by multiplying the monthly applicable billing kilowatt hours (kWh) by the CIP Adjustment Factor.

DETERMINATION OF CONSERVATION IMPROVEMENT PROGRAM ADJUSTMENT FACTOR

The CIP Adjustment Factor shall be calculated for each customer class by dividing the Recoverable Conservation Improvement Program Expense by the Projected Retail Sales for a designated recovery period. The factor may be adjusted annually with approval of the Minnesota Public Utilities Commission. The CIP Adjustment Factor for all rate schedules is:

All Classes	\$-0.000389 per kWh
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R

Recoverable Conservation Improvement Program Expense shall be the CIP expense not recovered through base rates as determined from the CIP Tracker account balance for a designated period. All costs appropriately charged to the CIP Tracker Account shall be eligible for recovery through this Rider. All revenues received from the CIP Adjustment Factor shall be credited to the CIP Tracker Account.

Projected Retail Sales shall be the estimated kilowatt-hour sales to all non-exempt customers for the designated recovery period.

(Continued on Sheet No. 5-92.1)

Date Filed:	10-10-24	By: Ryan J. Long	Effective Date:
Docket No.	E002/M-24-50	President, Northern States Power Company, a Minnesota corporation	Order Date:

CERTIFICATE OF SERVICE

I, Marie Horner, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

DOCKET No. E002/M-24-50

Dated this 10th day of October 2024

/s/

Marie Horner
Regulatory Administrator

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-50_M-24-50
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Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_24-50_M-24-50

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_24-50_M-24-50
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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