



414 Nicollet Mall
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March 20, 2018

—Via Electronic Filing—

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS - REF UND PLAN FOR NINTH DOE SETTLEMENT PAYMENT
DOCKET NOS. E002/M-15-1089, E002/M-17-828 AND
E,G999/CI-17-895

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits this Reply to Comments filed by the Minnesota Department of Commerce (Department) on March 8, 2018 in Docket Nos. E002/15-1089 and E002/17-828 regarding the Company's refund plan to return the ninth Department of Energy (DOE) settlement payment to ratepayers.

The Department expressed concern regarding the planned timing of the customer credit which was proposed for the first quarter of 2020 due to other customer credits and refunds scheduled for the remainder of 2019. We provide a summary of the current challenges we are facing regarding the scheduling of refunds and a potential solution.

Summary of Challenges

The application we use to process refunds in our billing system requires extraction of the necessary customer usage data from the billing system and the retention of this data until the refunds begin posting to customer accounts. We are currently only able to process one refund at a time because any data imported into the refund program overwrites the information already present.

Additionally, completing the necessary data extraction, testing, and validation to ensure accuracy is a lengthy—but important—process. Refunds such as the DOE credit involve extracting 12 months of historical usage and calculations for each of our million-plus electric customers. Due to the large volume of customers involved, the entire process can take up to eight weeks per credit or refund. While this

application is somewhat limited, it has generally worked well in the past, having been designed primarily to process periodic refunds resulting from completion of rate case proceedings.

The current backlog for customer refunds and credits is highly unusual and the result of a combination of events that has led to multiple refunds across several jurisdictions. This is primarily due to the passage of the Tax Credit and Jobs Act (TCJA) and the DOE settlement payments common to our three NSPM operating jurisdictions (MN, ND and SD). We do, however, anticipate the completion of all TCJA refunds in 2019. Attachment A shows a current schedule of refunds now in place for 2019.

Because these TCJA refunds are now underway and occupy our billing queue for the remainder of 2019, we have not been able to implement the ninth DOE payment refund and will not be able to do so as a standalone refund until the first quarter of 2020. In the meantime, however, the funds are being held in an external interest bearing account, and the calculated refund will include interest earned while the funds are residing in this account.

Proposed Resolution

We can mitigate congestion in the refund queue by combining two or more refunds into a single refund cycle. In consultation with the Department, we propose to include the ninth DOE payment with the 2019 TCJA electric refund, which will be posted to customer accounts from October 7-21, 2019.

In order to preserve the rate design intent of the TCJA and DOE proceedings, we propose to allocate refund dollars to class based on the approved allocation method of each refund. Specifically, the TCJA refund amounts would be allocated to customer class based on 2019 Commission ordered revenues from the Company's last rate case (Docket Number 15-826). And the DOE ninth payment would be allocated to class using the Commission approved nuclear cost allocator, also from the Company's last rate case. After the total refund (TCJA, and DOE) amount is calculated, each class's refund factor would be calculated by dividing the total refund amount by sales for January 1 to May 31, 2019. When the refund is executed, the appropriate refund factor would be applied to each customer's sales from January to May and would appear on the bill as one line item. Both active and inactive customers will receive refunds. Please see Attachment B for an example of how we can use this combined refund approach. This approach allows us to utilize an already scheduled refund without impacting the timeline of other refunds / credits planned for 2019.

Finally, we will work with the Commission's Consumer Affairs Office to update the planned customer messages. The customer bill insert we are providing to customers

starting on June 1 with the adjusted 2019 base rates would be updated to explain the inclusion of the DOE payment with the upcoming 2019 TCJA refund.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service lists. Please contact me at gail.a.baranko@xcelenergy.com or (612) 330-6935 Al Krug at allen.krug@xcelenergy.com or (612) 330-6270 or if you have any questions regarding this filing.

Sincerely,

/s/

GAIL A. BARANKO
MANAGER, REGULATORY PROJECT MANAGEMENT

Enclosures
cc: Service Lists

Queue Position	STATE	DESCRIPTION	TYPE	Docket / Case No.	\$	REG STATUS	TIMING	BILLING STATUS
1	ND	TCJA 2018	Elec		\$9.8M	ORDER Rec'd Dec 21, 2018		Posted to customer accounts on Mar 5th
2	MN	TCJA 2018	Elec	17-895	\$136M	PUC mtg Apr 11th	Start work after ND Elec TCJA; Post to Customer Accounts May 7 to 21 (dates in Jan 4 Compliance filing)	
	MN	2016 / 2017 AIP	Elec	17-429; 12-121				
3	MN	TCJA 2018	Gas	17-895	\$5.6M	PUC mtg Apr 11th	Start work after MN Elec 2018 TCJA; Post to Customer Accounts Jul 2 to 16 (dates in Jan 4 Compliance filing)	
4	SD	DOE #9	Elec		\$858K	ORDER Rec'd Feb 22; Implement in August	Start work after MN Gas 2018 TCJA	
5	MN	TCJA 2019	Elec	17-895	\$39.4M	PUC mtg Apr 11th;	Start work after SD DOE; Post to customer accounts Oct 7 to 21 (noted in Reply Comments)	
6	MN	TCJA 2019	Gas	17-895	\$3.2M	PUC mtg Apr 11th;	Start work after MN elec 2019 TCJA; Post to customer accounts Dec 9 to 23 (noted in Reply Comments)	
	MN	DOE #9	Elec	15-1089	\$11M	Refund plan filed Mar 1 noted that we would start implementation in 2020 Q1; also proposed including pmt #10	Start Q1 2020	
	ND	DOE #9	Elec		\$773K	Refund plan filed Mar 1 noted that we would start implementation in 2020 Q1; also proposed including pmt #10 or explore using FCR	Start Q1 2020	

2019 Minnesota TCJA Refund and DOE 9th Payment Credit Estimate

Attachment B

2019 TCJA Refund	\$39,365,000
<u>DOE 9th Payment Credit (Excl. Interest)</u>	<u>\$11,352,711</u>
Total Refund	\$50,717,711

	[1] 2019 Ordered Revenue (\$000) ¹	[2] = [1] % Revenue Refund Allocator	[3] = [1] x [2] 2019 TCJA Refund Allocation	[4] Nuclear Allocator ²	[5] = [4] x DOE Refund DOE 9th Pmt Credit Allocation
Residential	\$1,175,496	36.74%	\$14,461,099	30.60%	\$3,473,464
Commercial Non Demand	\$112,357	3.51%	\$1,382,229	3.09%	\$350,791
Commercial & Industrial Demand	\$1,883,324	58.86%	\$23,168,890	65.96%	\$7,488,010
<u>Lighting</u>	<u>\$28,676</u>	<u>0.90%</u>	<u>\$352,781</u>	<u>0.36%</u>	<u>\$40,446</u>
Total	\$3,199,853	100.00%	\$39,365,000	100.00%	\$11,352,711

	[6] = [3] + [5] Total Refund	[7] kWh Sales Fcst Jan 2019 - May-19	[8] = [6] / [7] Calculated Refund Factor	[9] Est Average Customers Jan - May 2019	[10] = [6] / [9] Estimated Average Refund per Customer
Residential	\$17,934,564	3,276,111,236	\$0.00547435	1,156,616	\$15.51
Commercial Non Demand	\$1,733,020	366,469,593	\$0.00472896	86,700	\$19.99
Commercial & Industrial Demand	\$30,656,900	7,800,047,696	\$0.00393035	48,026	\$638.33
<u>Lighting</u>	<u>\$393,227</u>	<u>59,670,645</u>	<u>\$0.00658996</u>	<u>27,540</u>	<u>\$14.28</u>
Total	\$50,717,711	11,502,299,169		1,318,882	

¹ Final Ordered Revenues Docket No. E002/GR-15-826

² NuclearClass Allocation Factors from Docket No. E002/GR-15-826.

CERTIFICATE OF SERVICE

I, Lynnette Sweet, 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-15-1089, E002/M-17-828 AND E,G999/CI-17-895

Dated this 20th day of March 2019

/s/

Lynnette Sweet
Regulatory Administrator

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