



414 Nicollet Mall
Minneapolis, MN 55401

July 9, 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
INVESTIGATION INTO ELECTRIC ENERGY COST ADJUSTMENTS
DOCKET NO. E999/CI-03-802

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments in response to the June 29, 2018 Comments of the Department of Commerce, Division of Energy Resources, the Office of the Attorney General – Residential Utilities Antitrust Division, and the Minnesota Chamber of Commerce regarding utilities' Fuel Clause Adjustment (FCA) Reform implementation compliance filings in the above-noted docket.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and served copies on the parties on the attached service list.

If you have any questions regarding this filing please contact me at (612) 330-6613 or amy.a.liberkowski@xcelenergy.com.

Sincerely,

/s/

AMY A. LIBERKOWSKI
DIRECTOR, REGULATORY PRICING & ANALYSIS

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie J. Sieben	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF AN INVESTIGATION
INTO THE APPROPRIATENESS OF
CONTINUING TO PERMIT ELECTRIC
ENERGY COST ADJUSTMENTS

DOCKET NO. E999/CI-03-802

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Reply Comments in response to the June 29, 2018 Comments of the Minnesota Department of Commerce, Division of Energy Resources, the Office of the Attorney General – Residential Utilities Antitrust Division, and the Minnesota Chamber of Commerce regarding utilities’ Fuel Clause Adjustment (FCA) Reform implementation compliance filings.

REPLY COMMENTS

A. Agreed-Upon Refinements to Reform Process

We appreciate the parties’ review of our compliance filing, as well as the participation of various stakeholders in two constructive meetings that took place in May and June of this year. As the Department notes in its Comments, those meetings resulted in a significant amount of agreement among stakeholders on a number of refinements and/or clarifications to the reforms adopted by the Commission in its December 19, 2017 Order. The Department’s Comments accurately reflect those areas of agreement, so we will not repeat them here.

That said, we do want to briefly address the issue of transitioning the FCA process to a calendar-year schedule. During the stakeholder meetings, the parties agreed that the upcoming reforms presented an opportunity to transition the FCA to a calendar-year schedule (as opposed to the current July-to-June schedule). We believe this refinement will result in efficiencies for the utilities, as well as our regulators and

stakeholders, as many of our other filings and forecasts are already based on the calendar year. Aligning the FCA with these other filings will make it easier to prepare the Company's forecasts and true-up filings, and will also lend itself to easier review and comparison between different filings and dockets.

We believe the best way to make this transition is to push back the implementation date for the reforms to January 1, 2020. While the Department initially proposed a six-month transitional reform period from July 1 to December 31, 2019, we were concerned the administrative burden of implementing this partial year of reforms—while also closing out the prior AAA and preparing and reviewing forecasts for the 2020 calendar year—outweighed the benefits of keeping the July 2019 start date.

Moreover, we believe the utilities and our stakeholders can put these additional six months to good use. First, it will allow the Company to refine its forecast presentation in a way that facilitates both the upfront review by the Department and facilitates the retrospective review that will occur if our actual costs exceed the forecast in a given year (which will likely result in a surcharge request and an evaluation by the Department and Commission as to the prudence of that request). Second, we believe the utilities can use the additional time to consider whether our forecast presentations can be standardized in certain ways, which could also lessen the administrative burden of simultaneously reviewing the separate forecasts for reasonableness. Third, we believe additional coordination and engagement with the Department and other stakeholders—particularly focused on how we develop FCA-related forecasts and how particular components drive the forecasts—will be critical to ensuring a successful transition to the reform process. To that end, we propose to share a template of our proposed forecast and rates prior to the April 2019 filing deadline, so that Department and other stakeholders can review it and ask any questions or request changes prior to starting the clock on the actual review process.

We are hopeful that this upfront work will help ensure a smooth and timely review of our April 2019 forecast and FCA rate filing, so that the filings can be reviewed, approved, and implemented by the January 1, 2020 start date.

B. The Company's Remaining Refinement Proposals

That said, the Department correctly notes that there are a few remaining issues upon which the parties could not fully reach consensus. These include (1) the use of provisional or interim rates to implement the annual true-up or following a significant unforeseen event; (2) the Company's proposal to file limited monthly updates to reflect changes in gas and market prices; and (3) the Company's proposal to adopt a

symmetrical incentive mechanism. We continue to believe our proposals on these issues merit Commission consideration (and approval). We briefly address each in turn below.

1. *Provisional Rate Implementation*

In our compliance filing, we proposed to implement the annual true-up at the time the true-up filing is made and prior to full Commission review and approval. Similarly, in the event of a significant unforeseen event, we proposed to update our monthly forecasts for the remainder of the annual period in question and implement the revised rates on a provisional basis subject to refund following Commission review of the filing. These proposals are driven by our concern over regulatory lag under the adopted reforms. For example, under the Department's current proposal (which involves full Commission review before implementation), the true-up for 2020 will not actually get implemented until 2022—a full two years after the 2020 rates took effect.

The impact of such substantial regulatory lag is considerable. First, we believe price signals suffer when customers are being charged or refunded money in connection with consumption decisions that occurred two years in the past. In effect, customers will be consuming electricity in January 2020 without experiencing the full impact of those consumption decisions until January of 2022.

Second, we have noted throughout this docket that our forecast of fuel costs is most significantly affected by forward natural gas and electric market prices that are difficult to predict over a year in advance of when market prices will settle and can exhibit substantial volatility during that period. As a result, we are concerned that the Company could substantially over- or under-forecast its actual costs in a given year, resulting in a significant over-collection or uncollected liability at the end of the year. Customers would not see a refund of over-collections for an additional year, with full refunds at the conclusion of the following year. In the case of under-collections, not being able to even begin collecting those costs for an additional year (and then not fully collecting them until conclusion of the following year) could have a material impact on our credit rating and financing costs, which ultimately impacts customer costs. For these reasons, we continue to believe that some kind of provisional implementation makes sense. And to be clear, we fully acknowledge that this provisional structure does not in any way shift the burden away from the Company to prove that its costs are just and reasonable. It simply relieves the timing pressure associated with the prudence demonstration and Commission review of those costs.

2. *Limited Monthly Updates*

With respect to monthly update filings, the Company proposed to provide limited input adjustments to the base forecast on a monthly basis so that customer costs reflect market prices on a near real-time basis. The three inputs we proposed to update are natural gas prices, electric market prices, and MISO costs such as congestion and FTR revenues. In other words, the monthly adjustment filings would be limited in scope and focused on costs that are readily verifiable and driven by market forces. All other FCA inputs—other fuel purchases, outage rates and durations, power purchase agreement costs, and others—would remain unchanged from the Company’s annual forecast, unless updated pursuant to significant unforeseen circumstances, as permitted by the Commission’s December 19, 2017 Order.

We proposed these monthly updates because we believe they are consistent with Minnesota’s and the Commission’s policies to both encourage energy conservation and provide customers the tools they need to make informed energy consumption decisions. Natural gas prices, electric market prices and MISO costs and revenues represent the three most volatile elements of the fuel clause—all of which are driven by market forces and may vary widely both hourly and seasonally. Regular updates to these factors will go a long way toward providing accurate price signals to our customers and reducing the probability that recovery will vary significantly from actual costs. At the same time, we believe these updates—which would be made in response to real-time market data—are consistent with the Commission’s aim of incentivizing utilities to control costs. It simply reduces the risk placed on utilities’ forecast of costs more than a year into the future from market price forces and also reduces the incentive to engage in expensive risk management or hedging contracts.

That said, to the extent the Commission has reservations regarding the frequency or scope of these proposed updates, we believe even quarterly updates would significantly improve the reformed process. Likewise, the Commission could limit updates to just the first two inputs identified in our compliance filing—natural gas prices and electric market prices—since those are the most volatile components of the fuel clause and can drive the greatest deviation from actual costs. They are also two of the most objectively verifiable inputs to the fuel clause, meaning there should be little controversy associated with the underlying data. This small refinement would substantially improve price signals for customers, would limit unnecessary and unproductive financial risk to the utilities, and would eliminate some of the potentially negative incentives associated with risk management.

3. *Banded Symmetrical Incentive*

Finally, we continue to believe that a banded incentive mechanism will be more effective at incentivizing utilities to control costs compared to simply putting utilities at risk relative to their annual forecasts. While putting utilities at risk relative to a forecast incentivizes parity between forecasted and actual costs, a banded incentive mechanism actually encourages utilities to *minimize costs* on a consistent basis. In this way, we believe a banded incentive mechanism will more effectively align the interest of utilities and their customers when it comes to fuel and related costs. We believe this kind of balanced incentive will be most effective at driving prudent utility behavior, and could minimize—if not eliminate—the administrative burden of investigating prudence retrospectively. While other utilities have not proposed an incentive mechanism, we believe it is both reasonable and beneficial to test the incentive waters in a controlled fashion with one or more utilities in this pilot.

C. Transition to New Reporting Requirements

The Department requests in its Comments that if parties have identified information currently filed in the monthly FCA reports or AAA reports that may no longer be needed under the FCA reform, they should identify that information at this time. Attachment A to this Reply details the various reporting requirements with which the Company currently complies in the monthly FCA reports, the annual AAA reports, and the quarterly fuel forecast reports. While many of these requirements were required by Commission Orders, we believe the FCA reform process is the appropriate time to revisit some of these requirements that may not be useful in the review of the fuel forecast and actuals under the reform, or that may have outlasted their usefulness.

The Company makes some preliminary recommendations for the current reporting requirements in Attachment A, but we believe further discussions with parties would be helpful. These discussions to work through the current reporting requirements could occur during the additional six months prior to implementation of the reform. We will also consider what the most appropriate format of data presentation might be under the reform, and we anticipate there may be format updates to some items that continue to be reported. To the extent necessary, we would request Commission approval to discontinue some reporting requirements Ordered in other dockets and will come forward with a more concrete proposal after further discussions with the Department.

CONCLUSION

We appreciate the opportunity to provide these Reply Comments to parties' Comments on the FCA reform implementation compliance filings. We look forward to additional discussions with parties to resolve remaining issues in this proceeding.

Dated: July 9, 2018

Northern States Power Company

The following tables are a summary of the Company’s preliminary recommendations for fuel clause reform treatment of current fuel clause, AAA, and other reporting. The Company notes that we believe further discussions would be helpful to fully define future reporting.

The Company proposes that all monthly Fuel Clause Adjustment filings be discontinued, and replaced with reporting in annual forecast and true-up filings as needed to support forecasted pricing and actual costs.

FCA Reporting Content	Docket	Order Date	Location of Reporting	Recommendation
Community Solar Gardens	E002/M-13-867	9/17/14	Monthly FCA Report p 4-5 <ul style="list-style-type: none"> • Attachment 1, page 2 • Attachment 3, page 3 	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
Windsorce RECs	E002/M-01-1479	5/7/02; 1/10/03	Monthly FCA Report p 5 <ul style="list-style-type: none"> • Attachment 1, page 2, line 5b 	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
Plant Outage Summary – Planned and Unplanned	E,G999/AA-06-1208	2/6/08	Monthly FCA Report <ul style="list-style-type: none"> • Attachment 1, pages 7a 7b 	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
MISO Day 2 Charges	E002/M-04-1970	4/7/05; 12/21/05; 2/24/06	Monthly FCA Report <ul style="list-style-type: none"> • Attachment 2, pages 1 to 7 	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
MISO Day 2 Charges (RSG/RNU)	E,G999/AA-06-1208	2/6/08	Monthly FCA Report	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.

Current Fuel Clause Reporting Requirements

FCA Reporting Content	Docket	Order Date	Location of Reporting	Recommendation
MISO Day 2 Charges (FTRs and ARRs)	E002/M-08-528	2/26/09	Monthly FCA Report	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
MISO Day 2 Charges	E002/M-08-528	3/17/09; 8/23/2010	Monthly FCA Report • Attachment 1, page 2	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
MISO ASM Charges	E002/M-08-528	8/23/10	Monthly FCA Report • Attachment 2, page 8 and 13; pages 10 to 13	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
MISO ASM Charges	E999/AA-07-1130	8/31/09	Monthly FCA Report • Attachment 1, page 2	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
Additional MISO Reporting (Day-Ahead and ASM cost allocation by costs and revenues)			Monthly FCA Report • Attachment 2, pages 14 and 15	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
Additional MISO Reporting (MISO Charges by Charge Type)			Monthly FCA Report • Attachment 2, pages 16-17	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.

Current Fuel Clause Reporting Requirements

FCA Reporting Content	Docket	Order Date	Location of Reporting	Recommendation
Prospective Asset and Non-Asset Based Margin Sharing	E002/GR-10-971	5/14/12	Monthly FCA Report •Attachment 3, page 1	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
Saver's Switch Discount Recovery			Monthly FCA Report •Attachment 3, page 1	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
Renewable*Connect	E002/M-15-985	2/27/17	Monthly FCA Report •Attachment 1, page 2	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
Input/Output Energy Balance	E002/M-04-1970	6/22/06	Monthly FCA Report •Attachment 1, page 8	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
FCC Prorate			Monthly FCA Report •Attachment 4	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
Moraine II	E002/M-08-1487	4/24/09	Monthly FCA Report •Attachment 1, page 9	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.

Current Fuel Clause Reporting Requirements

FCA Reporting Content	Docket	Order Date	Location of Reporting	Recommendation
Wind Curtailment	E,G999/AA-06-1208 E002/M-02-51, E002/M-00-622, E002/M-04-404, E002/M-06-85, E002/M-04-864, E002/M-05-1850 E002/M-05-1934 E,G999/AA-04-1279		Monthly FCA Report <ul style="list-style-type: none"> • Attachment 1, page 2, line 3b • Attachment 5A 	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
Company Owned Wind Curtailment (Nobles)	E002/M-08-1437	6/10/09	Monthly FCA Report <ul style="list-style-type: none"> • Attachment 5B 	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
WMRE Curtailment	E002/M-10-161	4/30/10		Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
Unusual Items over \$500,000	E999/AA-09-961; E999/AA-10-884	4/6/12	Monthly FCA Report <ul style="list-style-type: none"> • Attachment 6 	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.
10%/15% Variance Explanation	E002/GR-05-1428 (Settlement Agreement)		Included in the FCA if necessary	Discontinue monthly reporting. Provide as needed to support fuel forecast filing and actual costs filing.

Current Fuel Clause Reporting Requirements

The Company notes the following recommendations with regard to items currently being reported in the AAA filings.

AAA Reporting Content	Docket	Order Date	Location of Reporting	Recommendation
Policies and Actions 1 Fuel Procurement Policies 2 Dispatching Policies and Procedures 3 Fuel Supply 4 Conservation and Load Management Policy 5 Other Actions to Minimize Costs	Minn. Rules 7825.2800	NA	AAA Part D <ul style="list-style-type: none"> • Section 1 Schedule 1 Nuclear Fuel Component of Service • Section 1 Schedule 2 Coal Contracts • Section 1 Schedule Transportation & Related Services Contracts • Section 1 Schedule 4 Wood and RDF Contracts • Section 1 Schedule 5 Cost Changes 	Provide in annual fuel cost forecast filing.
Automatic Adjustment Charges 1 Base Cost of Fuel 2 Billing Adjustment Amounts Charged to Customers for Each Type of Energy Cost 3 Total Cost of Fuel Delivered to Customers 4 Revenue Collected from Customers for Energy Delivered 5 Monthly Fuel Clause Adjustment	Minn. Rules 7825.2810	NA	AAA Part E <ul style="list-style-type: none"> • Section 5 Schedule 1 Monthly Fuel Clause Adjustment • Section 5 Schedule 2 Fuel, Purchased Power and Other Costs • Section 5 Schedule 3 Company Generation, Purchased & Other MWh • Section 5 Schedule 4 Estimated Fuel-Related Costs per MWh • Section 5 Schedule 5 Costs Recovered from Sales of Energy to Others 	Provide in annual fuel cost forecast filing.
Annual Auditor’s Report 1 Letter to Audit Manager 2 Independent Auditor Report	Minn. Rule 7825.2820	NA	AAA Part F <ul style="list-style-type: none"> • Schedule 1 Memo to Auditor • Schedule 2 Annual Auditor’s Report 	
Annual Five-Year Projection	Minn. Rule 7825.2830	NA	AAA Part G <ul style="list-style-type: none"> • Section 1 Schedule 1, 5-Year Fuel Cost Forecast – Per Unit Summary • Section 1 Schedule 2, 5-Year Fuel Cost Forecast – Cost Summary • Section 1 Schedule 3, 5-Year Fuel Cost Forecast – Energy Summary 	Discontinue the 5-year forecast of fuel costs (Schedules 1-3). Replace with the annual forecast of fuel costs which will include a 24-month forecast.

Current Fuel Clause Reporting Requirements

AAA Reporting Content	Docket	Order Date	Location of Reporting	Recommendation
Annual Five-Year Projection (continued)			<ul style="list-style-type: none"> • Section 1 Schedule 4, Fossil Fuel Costs • Section 1 Schedule 5, Coal Burn Expenses • Section 1 Schedule 6 Nuclear Fuel Expenses • Section 1 Schedule 7 Peak Demand and Energy Requirements • Section 1 Schedule 8 Estimated Load Management Impact 	Discontinue Schedules 4-8 as information pertaining to these items will be provided in support of the assumptions used in the annual forecast of fuel costs.
History of Nuclear Sinking Fund	E002/M-81-306	7/14/81	AAA Part H, Section 1 <ul style="list-style-type: none"> • Schedule 1 	Discontinued in Docket No. E999/AA-16-523.
Investigation of NSP's Practices Regarding Energy Marketing and Fuel Clause	E002/CI-00-415	6/15/01	AAA Part H, Section 2 <ul style="list-style-type: none"> • Schedule 1 Generation Costs by Retail and Wholesale 	Discontinue, as 100% of system sales margins are credited to customers, with limited wholesale sales activity.
Natural Gas Financial Instruments	E002/M-01-1953 and E999/AA-02-950	3/20/02	AAA Part H, Section 3	
Transmission Transformer Report	E,G999/AA-07-1130, E999/M-07-1028, E999/M-09-602	8/31/09	AAA Part H, Section 4 <ul style="list-style-type: none"> • Schedule 1 Transmission Transformers Over 100 kV (In-Service) 	
Wind Curtailment Report	E002/M-00-622, E002/M-02-51, E002/M-04-404, E002/CN-01-1958, E002/M-04-864, E,G999/AA-04-1279, E002/M-05-1850, E002/M-05-1934 and E002/M-06-85		AAA Part H, Section 5 <ul style="list-style-type: none"> • Schedule 1 Wind Curtailment Summary [Also provided in monthly FCA as Attachment 5A] • Schedule 2 Wind Compliance Report 	Discontinue and provide wind curtailment information as needed to support forecasted and/or actual costs.
Renewable Energy Purchase Agreement with KODA Energy, LLC	E002/M-08-1098	1/29/09	AAA Part H, Section 6	Discontinue, as this contract terminates before the reform goes into effect.

Current Fuel Clause Reporting Requirements

AAA Reporting Content	Docket	Order Date	Location of Reporting	Recommendation
Power Purchase Agreement with WM Renewable Energy, LLC	E002/M-10-61	4/30/10	AAA Part H, Section 7	
Power Purchase Agreement with Diamond K Dairy, Inc.	E002/M-10-486	8/26/10	AAA Part H, Section 8	
Community Solar Gardens	E002/M-13-867	9/17/14	AAA Part H, Section 9 <ul style="list-style-type: none"> • Schedule 1 Community Solar Gardens Projects • Schedule 2 Community Solar Garden Bill Credits 	
Rule Variance Dockets	E999/AA-15-611	7/21/17	AAA Part H, Section 10 <ul style="list-style-type: none"> • Schedule 1 Rule Variance Dockets 	
MISO “Day 1” Operations	E002/M-00-257 E999/AA-11-792	5/9/02 8/16/13	AAA Part I, Sections 1-9	Discontinue, with possible exception of Schedule 10 MISO Administrative charges.
MISO “Day 2” Operations	E002/M-04-1970 <i>et al</i> E002/GR-05-1428 E,G999/AA-06-1208 E999/AA-14-479	12/21/05 12/20/06 2/6/08	AAA Part J, Sections 1, 2, 3 and 5 <ul style="list-style-type: none"> • Section 5 Schedule 1 Monthly MISO Day 2 Costs By Charge Types • Section 5 Schedule 2 Monthly MISO Day 2 Costs By Categories • Section 5 Schedule 3 Summary of NSP System MISO Day 2 Charges • Section 5 Schedule 4 Summary of NSP Intersystem MISO Day 2 Charges • Section 5 Schedule 5 Summary of NSP Retail MISO Day 2 Charges • Section 5 Schedule 6 Summary of Minnesota Retail MISO Day 2 Charges • Section 5 Schedule 7 Monthly MISO Day 2 Costs in Joint Report Format • Section 5 Schedule 8 Monthly MISO ASM Costs By Categories 	Provide streamlined reporting on MISO Charges in Section 5, in annual true-up/AAA filing.

AAA Reporting Content	Docket	Order Date	Location of Reporting	Recommendation
MISO “Day 2” Operations (continued)			<ul style="list-style-type: none"> • Section 5 Schedule 9 Summary of NSP System MISO ASM Charges • Section 5 Schedule 10 Summary of NSP Intersystem MISO ASM Charges • Section 5 Schedule 11 Summary of NSP Retail MISO ASM Charges • Section 5 Schedule 12 Summary of Minnesota Retail MISO ASM Charges • Section 5 Schedule 13 Monthly MISO ASM Costs in Joint Report Format • Section 5 Schedule 14 MISO Charges By Charge Types • Section 5 Schedule 15 Detail of MISO Day 2 Charges • Section 5 Schedule 16 Detail of MISO ASM Charges 	
Summary of Key Factors Affecting Costs in the Forecast, and Plan for Acquiring Fuel and Purchased Energy	E002/GR-05-1428 (Settlement Agreement)		AAA Part J, Section 3	Provide in annual fuel cost forecast filing.
FCA Quarterly Forecasts	E002/GR-05-1428		AAA Part J, Section 4 <ul style="list-style-type: none"> • Schedule 1 Quarterly Forecast of Fuel Costs [Also the Quarterly Reports] • Schedule 2 Deviation Analysis 	Discontinue if monthly fuel pricing is fixed for entire forecast year.
MISO Ancillary Services Market (ASM)	E002/M-08-528		AAA Part J, Sections 6 and 7 <ul style="list-style-type: none"> • Section 6 Schedule 1 ASM Daily Activity & Net Savings • Section 6 Schedule 2 Excessive Deficient Energy Deployment Charge by Unit • Section 6 Schedule 3 Contingency Reserve Deployment Failure Charges 	Discontinue, as report may no longer be useful.

Current Fuel Clause Reporting Requirements

AAA Reporting Content	Docket	Order Date	Location of Reporting	Recommendation
2006 AAA & MISO Filing Requirements	E,G999/AA-06-1208 and E002/M-04-1970 <i>et al</i>	2/6/08 12/21/05 12/20/06	AAA Part K, Section 1 <ul style="list-style-type: none"> • Schedule 1 Actual vs. Budgeted Generation Maintenance Expenses 	
2007 AAA Filing Requirements	E,G999/AA-07-1130	8/31/09	AAA Part K, Section 2	
2008 AAA Filing Requirements	E,G999/AA-08-995	3/15/10	AAA Part K, Section 3	
2009 & 2010 AAA Filing Requirements	E999/AA-09-961 and E999/AA-10-884	4/6/12	AAA Part K, Section 4 <ul style="list-style-type: none"> • Schedule 1 Power Purchase Agreement Off-Setting Revenues • Schedule 2 Forced Outages • Schedule 3 NSP Designated Resource for MISO Planning Year • Schedule 4 Unusual Adjustments Over \$500,000 	Discontinue Schedule 3 and 4. If needed, will be replaced by support for forecast/actuals in annual filings.
2011 AAA Filing Requirements	E999/AA-11-792	8/16/13	AAA Part K, Section 5 <ul style="list-style-type: none"> • Schedule 1 Hourly Day Ahead LMP Data • Schedule 2 Transmission Planning Criteria Manual • Schedule 3 Maintenance Program for Power Transformers 	Discontinue, as report may no longer be useful. If needed, will be replaced by support for forecast/actuals in annual filings.
Annual Notice of Report Availability	Minn. Rules 7825.2840	NA	AAA Part M	

Current Fuel Clause Reporting Requirements

The Company notes the following recommendations with regard to the 12 and 24 month fuel forecast reporting, as well as the biannual fuel forecast meeting.

Other Reporting Content	Docket	Order Date	Location of Reporting	Recommendation
12-Month Forecast of Fuel and Purchased Power Costs	E002/GR-05-1428 (Settlement Agreement)		Quarterly Report [Also included as AAA Part J, Section 4, Schedule 1]	Discontinue quarterly reporting.
Biannual Fuel Forecast Meetings	E002/GR-05-1428 (Settlement Agreement)		April and October	Discontinue meetings.
24-Month Forecast	E002/GR-08-1065		October Quarterly Report	Provide in annual fuel cost forecast filing.