



414 Nicollet Mall
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February 22, 2019

—Via Electronic Filing—

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

RE: REPLY COMMENTS
IN THE MATTER OF XCEL ENERGY'S TARIFF REVISIONS UPDATING
INTERCONNECTION STANDARDS FOR DISTRIBUTED GENERATION
FACILITIES ESTABLISHED UNDER MINN. STAT. §216B.1611
DOCKET NO. E002/M-18-714

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Reply Comments in response to the Comments filed by parties on February 4, 2019.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Amber Hedlund at amber.r.hedlund@xcelenergy.com or (612) 337-2268 or me at holly.r.hinman@xcelenergy.com. or (612) 330-5941 if you have any questions concerning this filing.

Sincerely,

/s/

HOLLY HINMAN
REGULATORY MANAGER

Enclosures
c: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF XCEL ENERGY'S
TARIFF REVISIONS UPDATING
INTERCONNECTION STANDARDS FOR
DISTRIBUTED GENERATION FACILITIES
ESTABLISHED UNDER MINN. STAT.
§216B.1611

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REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to the Comments filed by parties on February 4, 2019.

REPLY COMMENTS

On December 14, 2018, the Company filed its petition in this docket with proposed tariff revisions in compliance with the Commission's August 13, 2018 *Order Establishing Updated Interconnection Process and Standard Interconnection Agreement* in Docket No. E999/CI-16-521. The August 2018 Order required Xcel Energy to file updated tariffs consistent with the Commission's adoption of the Minnesota Distributed Energy Resources Interconnection Process (MN DIP) and the Distributed Energy Resource Interconnection Agreement (MN DIA) ("interconnection standards"). The Company's proposed tariffs to comply with the MN DIP and MN DIA were presented in its petition in this docket.

On January 4, 2019, the Commission issued its Notice of Comment Period for parties to address the following issue: "*Should the Commission approve Xcel Energy's proposed tariff revisions to implement the Minnesota Distributed Energy Resource Interconnection Process and Agreement?*" On February 4, 2019, the Department of Commerce (Department) and the City of Minneapolis (City) filed comments. The Department recommended approval of the Company's proposed tariff revisions with certain modifications and,

as discussed below, the Company agrees with these modifications. The City of Minneapolis proposed other tariff changes not related to the implementation of the MN DIP and MN DIA that we oppose as discussed below.

I. REPLY TO THE DEPARTMENT

The Department recommended two modifications to our proposed tariffs. First, the Department recommended removal of the Pre-application Report Request Form and related language from our proposed tariff sheets 10-168 and 10-169. Even though this content is directly from the MN DIP, we agree with this suggested change because this exact same content is in MN DIP Attachment 1 (at proposed tariff sheets 10-211 and 10-212). We agree that it would be redundant to include the same provisions at both locations in our tariff and agree that it is appropriate to remove this content from Sheets 10-168 and 10-169.

We agree with the Department's second recommendation that we remove error messages on Sheet 10-206 under the definitions of Interconnection Agreement and Interconnection Amendment. For the definition of Interconnection Agreement, the error message should be replaced with a reference to MN DIP Section 1.1.5. For the definition of Interconnection Amendment, the error message should be replaced with a reference to MN DIP Section 1.6.

II. REPLY TO THE CITY OF MINNEAPOLIS

The comments of the City of Minneapolis raise an issue outside of this proceeding and the scope provided in the Notice of Comment Period. The City takes issue with the concept of cost attribution for cost causers with respect to necessary system changes to accommodate the DER seeking to interconnect. The City stated that the MN DIP process may reduce the need for distribution system upgrades, and further recommended that the party seeking interconnection only be financially responsible for the net cost of distribution system upgrades after depreciation. It recommended specific wording changes in our existing tariffs to reflect their policy position.

The MN DIP and MN DIA each require the Interconnection Customer to pay for the actual costs of the Distribution Upgrades (See, MN DIP 5.6.1, 5.6.5, and MN DIA 4.1.1, 4.2 and 6.1.1). The City has not recommended changes to these provisions of the MN DIP and MN DIA. The City recommends that customers only be financially responsible for the net cost after depreciation of any required distribution system upgrades. We believe that the City is intending to address the cost less depreciation

for the value of facilities that are removed as part of the effort to accommodate the Interconnection Customer, and its statement is referring to crediting the cost to interconnect with the net book value (original cost less accumulated depreciation) of the asset being retired.

Because the City's proposal is inconsistent with the MN DIP and MN DIA, which require the interconnection customer to pay for the actual costs of distribution upgrades, we do not support this proposal. We also believe the City's arguments go beyond the scope of the Commission's Notice to address whether the proposed tariffs have properly implemented the MN DIP and MN DIA. For informational purposes, we provide a description of the accounting treatment for the costs of distribution upgrades in Attachment A.

CONCLUSION

We appreciate the opportunity to provide these Reply Comments. We support the recommended tariff revisions offered by the Department, and oppose those recommended by the City of Minneapolis.

Dated: February 22, 2019

Northern States Power Company

Accounting Treatment for Costs of Distribution Upgrades

In order to ensure that interconnection customers pay for the actual costs of distribution upgrades, it is imperative that the accounting transactions required for distribution upgrades remain rate base neutral. This ensures that all costs are passed on to the customer requiring the upgrade and are not borne by other customers. The four key issues to consider in this regard are:

- 1) Net book value of assets at retirement,
- 2) Actual net salvage of retired asset,
- 3) Impact of new interconnection equipment on rate base, and
- 4) Tax implications of Contributions in Aid of Construction (CIAC).

We will discuss each of these issues below.

- 1) Net book value of assets at retirement

The Company utilizes the group depreciation method for its distribution assets. Under group depreciation, assets of a similar type (distribution poles, overhead conductor, etc.) are grouped together and depreciated as a whole. Under this method, depreciation is not tracked for each individual asset. Depreciation rates are primarily based on an average service life of all of the assets in the group. It is assumed that some assets will be in operation longer than the average service life, while other assets will be retired before the average service life. It is assumed that the average useful life is sufficient to recover the depreciation for the assets spanning either side of the average. At the time of an asset's retirement, it is assumed that there is no longer any useful life on the asset and that the net book value of the asset is zero. Overall rate base remains unchanged due to the retirement of an existing asset.

The true net plant for the original cost of the asset being replaced is zero at retirement. Therefore, there is no net book value for the original cost to credit the interconnection costs. Further, the rate base at retirement is not changed and customers that are not involved with the distribution upgrades remain unaffected.

- 2) Actual net salvage of retired assets

Under the Company's normal depreciation process, estimated removal costs less estimate salvage (net salvage) is built into the calculation of depreciation expense. The depreciation rate used to calculate depreciation expense includes a portion to cover future removal costs, in order to collect these costs during the useful life of the

assets.¹ At the time of an asset's retirement, the actual net salvage experienced is booked as a credit to accumulated depreciation, which increases rate base.

However, in the case of interconnection-related upgrades, if the actual net salvage incurred on the assets replaced was allowed to be credited to the general accumulated depreciation account, rate base would increase and general customers would pay a higher return on rate base over time. In order to keep rate base neutral, actual net salvage should be added to the total interconnection costs charged to the requesting customer.

3) Impact of new interconnection equipment on rate base

When the new interconnection equipment is added, the requesting customer is charged the full capital cost of the new equipment. This payment, also known as CIAC, is credited against the capitalized value of the asset and reduces the book value on the Company's books to zero. This zero value asset will not be depreciated and has a net zero impact on the Company's rate base.

4) Tax implications of CIAC

CIAC payments received from customers are considered taxable revenue by the Internal Revenue service. At the time the payment is received the Company pays taxes on the transaction. In conjunction with the taxation of CIAC payments, the Company establishes a deferred tax asset that is included in rate base. This results in an increase to rate base over this period, which will result in a higher cost of service to be paid by the general ratepayer. The deferred tax asset is amortized over 20 years through annual tax deductions.

In the nominal sense, the tax payments upfront and tax deductions, through the amortization of the deferred tax asset, net to zero. However this analysis ignores the time value of money. The net present value of paying taxable income in year one and receiving tax deductions for the next 20 years is a loss to the Company and results in higher costs to customers, through higher return on rate base. The Minnesota jurisdiction generally allows this additional cost to be borne by all customers. In order to shift this cost to the entity generating the additional costs, the customer requesting interconnection, some jurisdictions have been adding this loss in time value to the cost of the interconnection. If the Commission wishes to consider adding this cost to the total interconnection costs, the Company estimates that it would increase the costs by 20 percent.

¹ Reserve for removal costs is included in accumulated depreciation for rate making purposes.

CERTIFICATE OF SERVICE

I, Jim Erickson, 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; or

xx by electronic filing.

Docket Nos.: E002/M-18-714

Dated this 22nd day of February.

/s/

Jim Erickson
Regulatory Administrator

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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