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April 12, 2018

—Via Electronic Filing—

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

RE: COMMENTS
2016 INCENTIVE COMPENSATION PLAN
DOCKET NOS. E002/GR-92-1185, G002/GR-92-1186, AND
E,G002/M-17-429

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Comments in response to the Commission's March 14, 2018 Notice of Comment Period in the above-noted dockets.

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 amy.a.liberkowski@xcelenergy.com or 612-330-6613 or Rebecca Eilers at rebecca.d.eilers@xcelenergy.com or (612) 330-5570 if you have any questions regarding this filing.

Sincerely,

/s/

AMY 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 Sieben	Commissioner
John Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY'S
ANNUAL REPORT OF ITS 2016 INCENTIVE
COMPENSATION PLAN

DOCKET NOS. E002/GR-92-1185
G002/GR-92-1186
E,G002/M-17-429
COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Comments in response to the Commission's March 14, 2018 Notice of Comment Period regarding our 2016 report on our Annual Incentive Compensation Plan (AIP). The Commission opened the following topics for comment:

- In determining whether a ratepayer refund is due, should Xcel compare the amount approved in base rates to (1) the amount eligible for recovery that was actually paid, or (2) the total amount of incentive compensation paid, including both the current amount that is eligible for cost recovery and the amount ineligible for cost recovery?
- Are there other issues or concerns related to this matter?

We provide these Comments to explain why we believe the amount of AIP approved in base rates should be compared to the total amount of incentive compensation paid. We believe this comparison is the appropriate calculation method because it is consistent with the intent of what the 15 percent cap was designed to accomplish and complies with the historical Commission Orders.

In short, we believe the relevant question in this docket is whether the Company paid out more AIP dollars in the 2016 performance year than we collected in base rates. As discussed below, for 2016, we did pay out more in AIP than we collected in base

rates. As such, we do not believe it is reasonable to conclude that the Company over-recovered any money with respect to AIP for 2016.

COMMENTS

A. Background

The incentive compensation paid through AIP is an important factor in the Company's ability to motivate and reward employees for superior performance. By way of background, the Company sets AIP compensation targets for each eligible pay grade within the Company's salary structure in order to keep the opportunity for compensation market-competitive. The employees in each pay grade have the ability to earn a target AIP payout if levels of performance are met under Xcel Energy's AIP.

We set the amount of incentive compensation eligible for recovery through base rates at the time of a rate case. The amount included in base rates was calculated by taking the test year target payout of AIP, no greater than 100 percent of a four-year average AIP payout, and then further limiting this amount to a cap of 15 percent of base salary. With these limitations, customers are not funding the full cost of employee compensation.

Thus, the amount of AIP included in base rates has already been limited in two ways: by limiting the amount to no more than a four-year historic average and by limiting it to 15 percent of base salary. Once these two limiting factors have been applied to set the amount included in base rates, we believe the proper comparison for compliance purposes is a comparison of the actual total AIP dollars paid out in a given year to the AIP dollars included in base rates. In other words, we do not believe the 15 percent cap should be applied on both sides of the comparison ledger—that is, to both the base rate calculation *and* the amount of actual AIP paid out in a given year. Indeed, the 15 percent cap in base rates already fully ensures that customers do not pay for AIP amounts in excess of 15 percent of base salary. Applying the cap a second time to the amount of AIP actually paid distorts the comparison between actual AIP paid and the capped amount of AIP that is part of base rates. The 15 percent cap is intended to limit the amount of AIP that is recoverable through base rates, and the cap achieves this goal at the time base rates are set.

B. Original Intent of 15 Percent Cap

The Commission's original intent in setting a 15 percent cap on AIP was to exclude recovery of a portion of the incentive compensation costs related to executives. The Commission's January 14, 1994 Order After Reconsideration in Docket No. E002/GR-92-1185 states:

The Commission continues to believe, for the reasons set forth in the original order, that the officers' and executives' plans allow too high a proportion of these employees' total wages to come from incentive compensation...The Commission will limit recoverable incentive payments to 15 percent of an individual's base salary.

In practice, the 15 percent cap not only limits officer and executive AIP, but it also goes beyond that to exclude recovery of a portion of the incentive compensation paid to middle management and some individual contributor employees as part of their total compensation package. We do not believe the Commission's setting the 15 percent cap was intended to be so granular as to look at each individual employee's actual payout and limit it to 15 percent of base compensation before comparing the aggregate AIP amount to base rates. Regulation generally occurs at a higher level of oversight, which supports a comparison of the actual amount of AIP paid to the amount of AIP included in base rates.

We are also guided by Ordering Point No. 29 of the Commission's Order in the 2012 electric rate case (Docket No. E002/GR-12-961) which states, "Xcel shall retain its existing refund mechanism, which provides customer refunds *in the event that the incentive compensation payouts are lower than the test-year level approved in rates*" (emphasis added). We believe this Order Point supports a broader comparison between total actual AIP paid and the capped amount of AIP in base rates and, as discussed below, that the more granular approach creates negative incentives.

C. Impacts on Incentive Structure

For the 2016 AIP performance year, we have paid out more incentive than the AIP amount set in base rates. While payouts can vary year to year, we are not channeling additional funds to executives and middle management nor significantly increasing the AIP dollars paid over 15 percent of base salary year over year. In fact, the percent of AIP dollars being paid each year below 15 percent of base salary has remained relatively stable from 2013 through 2016 as shown in Table 1 below:

Table 1

(in millions)	<u>2013 A</u>	<u>2014 A</u>	<u>2015 A</u>	<u>2016 A</u>
Below 15% of base	\$19.9	\$18.5	\$17.3	\$18.1
Above 15% of base	\$6.3	\$4.9	\$4.0	\$4.3
Total AIP	\$26.2	\$23.3	\$21.2	\$22.4
Percent below 15% of base	76%	79%	81%	81%

Each year, changes occur to the mix of employees who are eligible to receive a payout and their level of target payout. Changes to staffing levels, Company results, and individual performance are all factors impacting the year-end payout total. Some employees earn less than their target, or no incentive at all, due to poor performance. On the other hand, some employees excel and earn greater than their target, which is set at 15 percent. For AIP performance years 2013 through 2017, approximately 80 percent of the AIP eligible population had a target opportunity of 15 percent or less. This percent is similar to the percentage of dollars paid below the 15 percent of base salary shown in Table 1. Employees with a 15 percent AIP target are eligible to earn more than the 15 percent target for excellent performance, which serves as incentive to achieve strong results as the program intends. Ultimately, it is positive for the Company and the customers we serve if employees are achieving high performance outcomes and are earning greater than their target incentive without being funded by rate payers.

We believe there should be latitude to pay employees consistent with our plan standards, even if these dollars exceed 15 percent of an individual's pay. But we also believe those dollars should not be subject to refund if—in aggregate—we have paid out more incentive than the AIP amount in base rates. Incentive pay is one of the strongest ways to motivate employee performance consistent with Company objectives. The purpose of incentive pay is to align compensation with results. Employees are motivated to perform at a higher level because they are compensated for doing so. If the actual amount paid in excess of an employee's 15 percent target subject to refund, there could be a negative incentive for the Company to limit AIP payout to 15 percent for even high performing employees in order to ensure that all AIP dollars included in base rates are spent below 15 percent of base salary. A more granular approach to ratemaking could lead to a structuring of AIP payouts around the amount of AIP in base rates instead of in keeping with the purpose of the AIP structure. Comparing the capped payout to the amount included in base rates would

create poor incentives to not manage the AIP as intended, and could lead to demotivating high performing employees.

CONCLUSION

The Xcel Energy incentive program is working as designed. Employees are paid incentive compensation when they achieve higher levels of performance. We respect the Commission's Order to cap the recovery during the rate making process, but do not believe the Company should be penalized with an additional limitation after actual results are known and paid above the level of recovery. As discussed in these Comments, our AIP payout calculation methodology complies with the Commission's Orders in that we are overall paying out more AIP than we collect in base rates. We respectfully request that the Commission approve our 2016 report on our Annual Incentive Compensation Plan as originally filed.

Dated: April 12, 2018

Northern States Power Company

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 NOS. E002/GR-92-1185
 G002/GR-92-1186
 E,G002/M-17-429**

Dated this 12th day of April 2018

/s/

Lynnette Sweet
Regulatory Administrator

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