

October 31, 2019

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-19-609

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

Petition for Approval of the Renewable Development Fund Annual Report, Tracker Account True-up, and Request New 2020 Rate Rider Factor.

The petitioner is:

Bria E. Shea
Director, Regulatory & Strategic Analysis
Northern States Power Company d/b/a Xcel Energy
414 Nicollet Mall
Minneapolis, Minnesota 55401-1993

The Department recommends **approval of an adjusted 2020 RDF rate rider factor** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ SAMIR OUANES
Rates Analyst

SO/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-19-609

I. SUMMARY

On October 1, 2019, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed a petition (Petition) requesting that the Minnesota Public Utilities Commission (Commission) approve the 2020 Renewable Development Fund (RDF) rate rider factor beginning January 1, 2020. The Company also requested that the Commission accept the RDF Annual Report and Tracker Account True-Up.

II. BACKGROUND

Under Minnesota Statute Section 216B.1645, subdivision 2, Xcel is allowed automatic recovery of expenditures related to the Company's RDF, once those expenditures have been approved by the Commission.

On June 11, 2004, the Commission issued an Order (2004 Order) changing how Xcel recovers its RDF costs.¹ The 2004 Order established an annual RDF tracker report with a filing date of October 1. It specified that the current RDF rate adjustment would remain in effect until the Commission establishes a new rate, with any resulting over- or under-recoveries being rolled into the rate determination for the following period.

On June 28, 2005, the Commission issued its *Order Setting Rider, Approving Contract Amendments and Process for Future Amendments, and Requiring Continued Reporting*, in Docket No. E002/M-05-109. In this Order, the Commission approved a new level for the RDF rate adjustment rider. The Commission concluded that Xcel's late payments on five RDF contracts did not jeopardize ratepayers' interests or constitute harm. With regard to the AnAerobics' project (Bid No. AB07, Cycle 1), the Commission indicated that, in an earlier decision, it had deferred a decision on the recovery of costs associated with this project to a later date.² The Commission concluded that whatever further action was warranted pertaining to AnAerobics could be better addressed in the context of Docket No. E002/M-00-1583.

¹ *Order Changing Inter-Jurisdictional Cost Allocations, Establishing Rate Rider, and Removing Renewable Development Fund Expenses from the Fuel Clause*, Docket No. E002/M-03-2018.

² Commission's August 17, 2004 Order in Docket No. E002/M-00-1583.

On January 27, 2006, the Commission issued its *Order Approving RDF Rate Rider Factor, Accepting Compliance Filing, and Requiring Filings*.³ In this Order, the Commission adopted the Department's recommendation to remove the 2006 projected payments to Crown Hydro from the calculation of the rate rider, and approved the corresponding reduced level for the RDF rate adjustment rider. The Commission clarified that it understood Xcel's assurance to be that the remaining payment milestones under the Crown Hydro grant contract were all construction related and could not proceed without site control and before all needed permits are approved.

On December 15, 2006, the Commission issued an Order approving the 2007 RDF rate rider factor in Docket No. E002/M-06-1388. In this Order, the Commission adopted the Department's recommendation to remove any payment to Hilltop Power from the calculation of the 2007 RDF rate rider factor.

On December 7, 2007, the Commission issued an Order approving the 2008 RDF rate rider factor in Docket No. E002/M-07-1274.

On December 23, 2008, the Commission issued an Order approving the 2009 RDF rate rider factor in Docket No. E002/M-08-1167.

On June 2, 2010, the Commission issued its *Order Approving 2010 Renewable Development Fund Rider Factor, Requiring Compliance Filing, and Revising Calculation of Future Rider Adjustments* in Docket No. E002/M-09-1145. In this Order, the Commission adopted the Department's recommendation that the Company calculate its future RDF rate rider factors based only on known and measurable RDF expenditures. The Commission recognized that, in limited circumstances, such expenditures can include certain forecasted amounts. The Commission therefore directed the parties to work to determine an appropriate standard against which to judge what expenditures, including forecasted amounts, can be included under the umbrella of known and measurable RDF expenditures.

On March 17, 2011, the Commission issued its *Order Approving 2011 Renewable Development Fund Rider* in Docket No. E002/M-10-1054. In this Order, the Commission allowed Xcel to continue to calculate its future RDF rate rider factors based on known and measurable Renewable Development Fund expenditures, which, in limited circumstances, can include forecasted amounts, using the criteria for "known and measurable" agreed to by Xcel and the Department. The Commission required Xcel to meet with the Department to clarify the definition and application of the five percent administrative cost cap. The Commission also denied Xcel's request to reallocate to the Minnesota jurisdiction RDF program expenses currently allocated to the jurisdictions of North Dakota and South Dakota.

On June 6, 2011, the Commission issued its *Order after Reconsideration Modifying March 17, 2011 Order and Reallocating Expenses* in Docket No. E002/M-10-1054. In this Order, the Commission modified its March 17, 2011 Order to reallocate to Minnesota ratepayers the 2011 RDF energy

³ In the matter of Xcel's Petition for Approval of the Renewable Energy Development Fund Annual Report, Tracker Account True-Up, and New 2006 Rate Rider Factor, Docket No. E002/M-05-1570.

production grant payments and associated administrative expenses previously allocated to North Dakota and South Dakota.

On February 17, 2012, the Commission issued its Order approving the 2012 RDF Rider in Docket No. E002/M-11-1007. In this Order, the Commission approved the proposal regarding the definition and application of the five percent administrative cost cap agreed to by Xcel and the Department. The Commission also required Xcel to identify at the time of its initial filing any actual numbers that have changed from a previous report, including a complete justification for the change.

On December 21, 2012, the Commission issued its Order approving the 2013 RDF Rider in Docket No. E002/M-12-1062. The Commission also required Xcel to enter any source data in its RDF tracker model only once as an input data, to alleviate the reoccurrence of discrepancies and inconsistencies identified by the Department in the RDF tracker account provided in the Company's RDF petitions.

On August 8, 2013, Xcel filed a status update on the development of replacement projects for the equipment associated with the AnAerobics RDF project pursuant to the August 17, 2004 *Order Deferring Decision, Allowing Time to Develop Alternative Uses, and Requiring Consultation and Report* (2004 Order) in Docket E002/M-00-1583.

On October 2, 2013, the Department filed comments continuing to recommend disallowing rate recovery and refunding to ratepayers all amounts paid to AnAerobics, claiming the contract between Xcel and AnAerobics had been improperly amended and imprudently administered.

On January 23, 2014, the Commission issued its Order requiring Xcel to return to ratepayers the \$1.1 million paid to AnAerobics by crediting the RDF tracker account for this amount.

On January 28, 2014, Xcel filed the Commission-required refund compliance plan (Refund Plan). The Refund Plan identified the portion of the \$1.1 million that was paid by Xcel's Minnesota ratepayers as \$811,518. Attachment B of the Refund Plan shows that the amount of \$811,518 would be subtracted from the expenses Xcel will recover from its Minnesota ratepayers in setting the 2015 RDF rates.

On September 26, 2014, Xcel filed a petition in Docket No. E002/M-14-814 requesting that the Commission approve the 2015 RDF rate rider factor and accept the RDF Annual Report and Tracker Account True-Up.

On October 27, 2014, the Department filed comments recommending approval of a reduction in Xcel's proposed 2015 RDF rate rider factor to take into account the Commission-required refund of grant payments to AnAerobics that Xcel failed to subtract from the RDF tracker account.

On December 12, 2014, the Commission issued its Order approving the 2015 RDF rate rider factor as recalculated by the Department.

On December 11, 2015, the Commission issued its Order approving the 2016 RDF rate rider factor in Docket No. E002/M-15-730.

On December 11, 2016, the Commission issued its Order approving the 2017 RDF rate rider factor in Docket No. E002/M-16-811.

On September 25, 2018, the Commission issued its Order (2018 Oder) approving the Department's correction of Xcel's proposed 2018 RDF rate rider factor in Docket No. E002/M-17-712.⁴ The Commission also required the Company to remove the \$28,009 in administrative costs in its proposed 2018 Rider from the tracker balance.

On October 15, 2018, the Commission issued its Order in Docket No. E002/M-17-712 directing Xcel to exercise Crown Hydro grant contract termination rights.

On October 22, 2018, Xcel filed a letter to inform the Commission that the Company complied with the October 15, 2018 Order in Docket No. E002/M-17-712 with the issuance of a notice of termination to Crown Hydro in connection with the RDF grant contract on October 22, 2018.

On December 21, 2018, the Commission issued its Order approving the 2019 RDF rate rider factor in Docket No. E002/M-18-628.

On April 9, 2019, the Commission issued its Order approving Xcel's proposal to reduce the 2019 RDF rate rider factor following its reduced 2019 transfer payment to the Minnesota Management and Budget (MMB).

III. DEPARTMENT ANALYSIS

Xcel filed its petition under Minn. Stat. § 116C.779. The statute was enacted to require Xcel, as the public utility that owns the Prairie Island and Monticello nuclear power plants, to transfer funds (in dollar amounts determined by the number of dry casks containing spent fuel at each facility), into an account that is used to support the development of various innovative energy projects, such as renewable electric energy technologies.

Currently, Xcel's RDF rate rider factor (RDF factor) is set at \$0.001357 per kWh, and is recovered through the Resource Adjustment charge, a line item on customers' bills. The level of the RDF factor is adjusted once a year to a level allowing recovery of both actual costs (using a true-up procedure) and forecasted RDF costs for known and measurable amounts.

Up to 2017, the Company's recovery did not extend to all RDF obligation amounts, let alone the amounts awarded to projects that have not met required milestones. The recovery was limited to the

⁴ Given the Company's forecast of the legislative mandates expenses to be paid out of the RDF, Xcel's original proposal (Option 1) overestimated the RDF amount to be transferred to MMB on January 15, 2018.

payments to RDF projects and legislative mandates for actual or known and measurable amounts. A true-up of expenditures and revenues is conducted annually. The remainder of obligated funds are tracked as unencumbered or as deferred payments and are not yet collected from ratepayers. This structure has been important both to ensure that ratepayers pay only for actual or known and measurable RDF costs and to hold Xcel and project owners financially accountable.

Under the 2017 legislative changes to Minn. Stat. § 116C.779, the Legislature established a new renewable development account (RDA) as a separate account to be administered by MMB and directed Xcel to transfer all funds, by July 1, 2017, from the RDF to the RDA (a one-time transfer requirement). The statute clarifies that certain funds are not subject to the transfer requirement, including “funds awarded to grantees in previous grant cycles that have not yet been expended and unencumbered funds required to be paid in calendar year 2017 under paragraphs (f) and (g) and sections 116C.7792 and 216C.41.”⁵

In addition, Xcel is obligated to pay annually into the RDA \$500,000 for each dry cask (sealed container storing spent fuel) at the Prairie Island power plant and \$350,000 for each dry cask at the Monticello nuclear power plant and must make the required payments by January 15 each year, beginning in 2018. The statute authorizes Xcel to withhold from these payments “the amount necessary to pay its obligations under paragraphs (f) and (g) and sections 116C.7792 and 216C.41, for that calendar year.”⁶

In its 2018 Order, the Commission approved the Company’s proposal which reflected that “no RDF funds [were] eligible for the one-time transfer requirement from the RDF to the RDA” and Xcel’s corrected calculation of the first RDA transfer payment to MMB that was to be made on January 15, 2018 (\$8,817,885).

In the instant filing, Xcel proposes a new RDF factor to recover the following costs:⁷

- 2020 payments made to fulfill legislative mandates (RDA transfer payment of \$14,852,115 to MMB, and other legislative mandates of \$18,527,050 + \$620,835, or \$19,147,885);
- payments made to RDF grant projects in 2020 (Minnesota Jurisdictional amount of \$50,743 + \$2,404,907, or \$2,455,650);
- 2020 RDF administrative expenses (\$0); and
- true-up expenses for under-recovered costs from the 2019 RDF factor (\$723,180).

According to the Company, these expenses total \$37,178,830 and result in a RDF factor equal to \$0.001289 per kWh.⁸ For an average residential customer, the proposed RDF factor would result in a charge of about \$0.97 per month.⁹

⁵ Source: <https://www.revisor.mn.gov/statutes/cite/116C.779>

⁶ Id.

⁷ Source: Attachment 3 of the Petition.

⁸ Id.

⁹ Based on an average monthly consumption of 750 kWh: \$0.001289/kWh*750 kWh/month = \$0.97/month.

To facilitate the review of the Company's tracker report activity, the Department maintains a separate RDF tracker spreadsheet and updates the information each year with the new input data provided by the Company in its annual RDF filings as summarized in the following attachments:

- **Attachment 1:** 2018 RDF/RDA Budget
- **Attachment 2:** 2019 RDF/RDA Budget as Adjusted by the Department
- **Attachment 3:** 2020 RDF/RDA Budget and Rate Rider Factor Calculation as Adjusted by the Department
- **Attachment 4:** Actual RDF Unencumbered Cumulative Balance and RDA balance as of December 31, 2018

The Department's analysis below is based on a review of Xcel's tracker report activity in 2018, 2019 and 2020, the information provided by the Company regarding the progress made by the Commission-approved RDF projects,¹⁰ and the legislative mandate that requires transfer payments to the RDA administered by MMB from the RDF administered by Xcel.

The updated input data supporting Xcel's calculation of its proposed RDF factor covers the period of January 2018-August 2019 (actual data) and the period of September 2019-December 2020 (forecasted data).

A. *KNOWN AND MEASURABLE CRITERIA*

In its November 5, 2009 comments, the Department raised a concern about the use of RDF project payment forecasts, instead of actual expenditures, given the level of the surplus (over-recovery) in the RDF tracker.¹¹ The monthly cumulative balance of the RDF tracker has been negative (surplus) in the past, meaning that ratepayers paid more into the RDF tracker than Xcel actually spent. The actual cumulative surplus of the RDF tracker was about \$6 million in December 2006, \$3.8 million in December 2007, \$5.2 million in December 2008, \$3.1 million in December 2009, and \$2.9 million in December 2010.

To alleviate the overcharges due to the continuous monthly cumulative surplus balances in the Company's RDF tracker account, the Commission's March 17, 2011 Order in Docket No. E002/M-10-1054 included the following requirement:

Xcel may continue to calculate its future Renewable Development Fund rate rider factors based only on known and measurable RDF expenditures, which, in limited circumstances, can include forecasted

¹⁰ Xcel filed its most recent Quarterly Status Report on August 26, 2019 in Docket Nos. E002/M-00-1583, E002/M-03-1883, E002/M-07-675 and E002/M-12-1278.

¹¹ Docket No. E002/M-09-1145.

amounts, using the criteria for “known and measurable” agreed to by Xcel and the OES [Department].

The application of these criteria (described below) appears to be working. Since March 2012, with the exception of February-March 2013, October-December 2017 and April-May 2018, the RDF tracker has not experienced a cumulative balance surplus.

As discussed further in the Petition, Xcel complied with the above requirement as follows:

Legislative Mandates. The Company proposed to include the following legislative mandates as known and measurable RDA/RDF costs in 2018, 2019 and 2020:

- the Renewable Energy Production Incentive (Minn. Stat. § 216C.41), or REPI,¹²
- the Rebates for Solar Photovoltaic Modules (Minn. Stat. § 116C.7791), or Solar Rebates,¹³
- the Solar Energy Incentive Program (Minn. Stat. § 116C.7792), or Solar Incentive,¹⁴
- the 2018 transfer payment of \$1M to the Department of Employment and Economic Development (2017 Chapter 94, Article 1, Section 2, subdivision jj), or MN 21st Century,¹⁵
- the Solar Energy Standard Exemption (Minn. Stat. § 216B.1691, subd. 2f(f)),¹⁶
- the grant payments to the City of Benson (Minn. Stat. § 116C.779, subd. 1f),¹⁷
- the grant payments to the Laurentian Energy Authority (Minn. Stat. § 116C.779, subd. 1g),¹⁸ and
- the RDA transfer payments to MMB.¹⁹

Given that these payments are mandated by law, the Department agrees with Xcel’s proposal to treat such payments as known and measurable for cost recovery purposes in 2018, 2019 and 2020.

Tables 1.1, 1.2 and 1.3 below show the actual (2018) and forecasted (2019 and 2020) RDF payments for these legislatively mandated programs.

Table 1.1

¹² Available at: <https://www.revisor.mn.gov/statutes/cite/216C.41>

¹³ Available at: <https://www.revisor.mn.gov/statutes/cite/116C.7791>

¹⁴ Available at: <https://www.revisor.mn.gov/statutes/cite/116C.7792>

¹⁵ According to Attachment 6 (page 1 of 2) of Xcel’s 2018 petition in Docket No. E002/M-18-628, Xcel made this payment on June 2018.

¹⁶ Available at: <https://www.revisor.mn.gov/statutes/cite/216B.1691>

¹⁷ Available at: <https://www.revisor.mn.gov/statutes/cite/116C.779>

¹⁸ *Id.*

¹⁹ *Id.*

Minnesota Statutes	REPI 216C.41	Solar Rebates 116C.7791	Solar Incentive 116C.7792	Benson 116C.779 (1.f)	Laurentian 116C.779 (1.g)
Up to 2017	\$ 91,799,762	\$ 17,609,524	\$ 1,239,115	\$ -	\$ -
2018	\$ 840,405	\$ 1,650,547	\$ 725,653	\$ 4,000,000	\$ 13,600,000
2019	\$ 393,182	\$ 336,092	\$ 3,269,827	\$ 6,500,000	\$ 6,800,000
2020	\$ 620,832	\$ 21,578	\$ 5,205,472	\$ 6,500,000	\$ 6,800,000
Up to 2020	\$ 93,654,181	\$ 19,617,741	\$ 10,440,067	\$ 17,000,000	\$ 27,200,000

Table 1.2

	DEED	
Minnesota Statutes	MN 21st Century 2017 Ch 94 Art 1	SES Exemption 216B.1691
Up to 2017	\$ -	\$ -
2018	\$ 1,000,000	\$ 77,123
2019	\$ -	\$ 39,210
2020	\$ -	\$ -
Up to 2020	\$ 1,000,000	\$ 116,333

Table 1.3

	Forecast 2020
1. 2020 RDF/RDA Obligation	\$ 34,000,000
2. 216C.41	\$ 620,832
3. 116C.7791	\$ 21,578
4. 116C.7792	\$ 5,205,472
5. Benson	\$ 6,500,000
6. Laurentian	\$ 6,800,000
7. 2020 Transfer to MMB	\$ 14,852,118
(7) = (1)-(2)-(3)-(4)-(5)-(6)	

Table 1.3 shows the calculation of the RDA transfer payment to MMB for 2020 based on the Commission-approved method.²⁰

Xcel summarized the legislatively mandated programs and corresponding amounts that can be considered known and measurable RDF expenditures.

The Company described the REPI program as follows:²¹

Minn. Stat. §116C.779, Subd. 2. mandates that annual REPI payments up to \$10.9 million must be made available from the RDF account for qualifying projects, including up to \$9.4 million annually for electricity generated by wind energy conversion systems and up to \$1.5 million annually for on-farm biogas recovery facilities and hydroelectric facilities. The REPI program provides an incentive payment of 1.0 cents per kWh for wind projects through December 31, 2018, for biogas projects through December 31, 2017, and for hydro projects through December 31, 2021. All REPI payments for wind and biogas were completed in 2018 or prior and therefore the forecasted REPI amount relates only to hydro. Xcel Energy is in compliance with the REPI statute since the annual amounts to be included in the 2020 RDF rate rider for cost recovery are the aggregate incentive payment for qualifying hydroelectric facilities as reported or projected by the Minnesota Department of Commerce, who administers this incentive program.

Xcel's summary of the Solar Rebates program is as follows:²²

Minn. Stat. §116C.7791, Subd. 5. mandated solar rebates, up to \$5.00 per watt of installed capacity for systems up to 40 kW, to be available for installations that use solar modules either manufactured or assembled in Minnesota. The statute appropriated \$21 million from the RDF at the rate of \$2 million in state fiscal year 2011, \$4 million in state fiscal year 2012, and \$5 million per year in state fiscal years 2013 through 2015. The Minnesota Bonus rebates are paid to each qualifying customer in five consecutive annual installments. The final installments was expected to be paid in 2019, but the small amount noted here [\$21,578] is expected to carry over into 2020. The Minnesota Bonus Solar Rebate Program was offered from 2011–2014. As of March 28, 2014, this program was fully subscribed to obligate the statutory appropriation of \$21 million. Since it is full subscribed, no new applicants have been accepted.

²⁰ Source: Table 1 of the 2018 Order.

²¹ Source: Petition at page 11 of 58.

²² Source: Petition at 12 of 58.

Applications submitted prior to March 28, 2014, have been processed and honored; therefore, current disbursements from the RDA are made through existing contracts. Xcel Energy is in compliance with the statute since the annual amounts included in the RDF rate rider for cost recovery are the aggregate Minnesota Bonus rebates for qualifying solar facilities as reported or projected by the Company, as the administrator of this rebate program.

The Company summarized the Solar Incentive program as follows:²³

Minnesota's Solar Energy Standards established by Minn. Stat. §116C.7792 directed the Company to establish a solar energy incentive program to be funded in full by RDA funds. The program is to provide solar energy production incentives for solar energy systems of no more than a total nameplate capacity of 40 kW alternating current. The original statute specified that the program shall be operated for five consecutive calendar years commencing in 2014. The production incentive is to be paid over the course of 10 years, commencing with the system operation. In 2017, the Minnesota Legislature approved a three-year extension and appropriated a total of \$60,000,000 to the Solar Energy Incentive Program also known as Solar*Rewards. The terms of the program remain the same with the production incentive to be paid over the course of 10 years, commencing with the system operation.

...

Xcel Energy is in compliance with the statute since the annual amounts included in the RDF rate rider for cost recovery are the aggregate Solar*Rewards incentive payments for qualifying solar facilities as reported or projected by the Company, as the administrator of this incentive program.

Xcel provided the following summary of the Solar Energy Standard Exemption:²⁴

The SES (Minn. Stat. § 216B.1691, subd. 2f(d)) provides an exemption from the costs of satisfying the solar standard to customers that are an iron mining extraction and processing facility, a paper mill, wood products manufacturer, sawmill, or oriented strand board manufacturer. The RDF program provides funding for various solar programs and projects that are used by the Company to satisfy the solar standard. Consequently, customers who have requested SES cost exemption and been approved

²³ Source: Petition at 13 of 58.

²⁴ Source: Petition at 23 of 60.

will be excluded from or credited these costs in the RDF rate rider adjustment. The refunded costs will then be included for recovery in the subsequent RDF rate rider adjustment. Currently, two customers have received approval for exemption from the SES costs in the RDF rate rider effective June 1, 2017. The process for calculating, excluding, and recovering the SES costs in the RDF rate rider for customers approved for SES cost exemption was approved by Order January 1, 2018 in Docket No. E-002/M-17-425. The refunds of 2018 SES related RDF/RDA costs were credited to the two exempt customers in March 2019 totaling \$39,210. These refunded costs will be included in the present docket's 2019 costs as a separate line item.

The Company described the Laurentian Energy Authority Initiative as follows:²⁵

In this filing, we are proposing to recover \$6,800,000 for a payment to Laurentian Energy Authority forecasted to be made July 2020, an appropriation funded in full through the RDF. This forecasted payment is legislatively mandated, and as shown on Attachment 6, the Laurentian Energy Authority payment is a once-a-year, annual disbursement. The July 2020 disbursement will be the fourth of five \$6,800,000 annual payments to Laurentian Energy Authority.

In 2017, the Minnesota Legislature approved an appropriation of \$34,000,000 over a five year period (fiscal years 2018-2022) from the RDA to the Laurentian Energy Authority, LLC (LEA) to assist the transition required by the termination of the power purchase agreement (PPA).

The LEA Initiative established by Minn. Stat. 116C.779 subdiv. 1(g) explains that if the Commission "approves a new or amended power purchase agreement, or the termination of a purchase power agreement . . . with an entity owned or controlled, directly or indirectly, but two municipal utilities located north of Constitutional Route No. 8, that was previously used to meet the biomass mandate" the Company shall enter into a grant contract for the above referenced amount. Cancellation of the LEA PPA was approved by the Commission on January 23, 2018 (Docket No. E-002/M-17-551) and by the North Dakota Public Service Commission (NDPSC) on June 27, 2018 (Case No. PU-17-270).

²⁵ Source: Petition at pages 13-14 of 58.

Finally, Xcel described the City of Benson Initiative as follows:²⁶

In this filing, we are proposing to recover \$6,500,000 for a payment to the City of Benson forecasted to be made June 2020, an appropriation funded in full through the RDF. This forecasted payment is legislatively mandated. As shown on Attachment 6, the City of Benson payment is a once-a-year, annual disbursement. This will be the third of four annual disbursements to the City of Benson.

In 2017, the Minnesota Legislature approved an appropriation of \$20,000,000 over a four year period (fiscal years 2018-2021) from the RDA to the City of Benson for purposes of economic development.

The City of Benson Initiative established by Minn. Stat. 116C.779 subdiv. 1(f) explains that if the Commission “approves a new or amended power purchase agreement, the termination of a power purchase agreement, or the purchase and closure of a facility..., with an entity that uses poultry litter to generate electricity” the Company shall provide grants to the city for the purposes of economic development. Cancellation of the Fibromen PPA was approved by the Commission on January 23, 2018 (Docket No. E-002/M-17-530) and by the NDPSC on June 27, 2018 (Case No. PU-17-270).

In addition to legislative mandates, grant project payments are also considered known and measurable RDF expenditures. The following describes the types of administrative duties needed for grant contracts and other awards from the RDF.

Grant Project Payments. In response to the Commission’s June 2, 2010 Order in Docket No. E002/M-09-1145, the Company developed specific criteria regarding whether or not certain RDF grant project payments should qualify for inclusion in the RDF forecast for cost recovery purposes.

In its November 1, 2010 comments in Docket No. E002/M-10-1054, the Department agreed with the criteria as described below since they provide for a reasonable checklist of potential areas where a project may have trouble proceeding. As a result, application of these criteria should help ensure that, rather than setting rates based on the expectation that all projects would proceed as anticipated and later removing costs for projects that had difficulty, projects would have to meet the milestones before the costs are included in rates.

²⁶ Source: Petition at page 14 of 58.

The specific criteria are as follows:

1. Energy Production (EP) Projects: All of the following criteria must be met for costs to be included as known and measurable costs:
 - a. An executed RDF grant contract has been reviewed by the Department and approved by the Commission;
 - b. An executed power purchase agreement (PPA) has been reviewed by the Department and approved by the Commission;
 - c. Any necessary co-financing for the project has been secured;
 - d. Any necessary site lease has been secured; and
 - e. Actual construction activity has been initiated.

The only exception to the above list pertains to energy production projects designed for self-generation purposes. In such cases, the PPA requirement does not apply.

2. Research & Development (R&D) Projects: All of the following criteria must be met for costs to be included as known and measurable costs:
 - a. An executed RDF grant contract has been reviewed by the Department and approved by the Commission;
 - b. At least twelve months of project activity has been completed;
 - c. All RDF grant contract milestone requirements have been completed in a timely manner (within 21 days of the due date) during at least the past twelve months;
 - d. The project is currently within budget (plus or minus 10 percent);
 - e. No outstanding technical issues need to be resolved in order to proceed with the project in a timely manner; and
 - f. Project management stability has been demonstrated, *i.e.*, no unexpected turnover.

B. ADMINISTRATIVE COST CAP

The five percent administrative cost cap was established by the Commission in its April 20, 2001 Order in Docket No. E002/M-00-1583 (*Adopting Proposal for Oversight and Operation of RDF*). The language adopted by the Commission regarding RDF administrative expenses specified that “[i]n no case may these costs exceed five percent (5%) of the fund’s total obligations.” The Commission reaffirmed the five percent cap in an October 5, 2006 Order in the same docket.

The Commission’s March 17, 2011 Order in Docket No. E002/M-10-1054 directed Xcel and the Department to meet to clarify the definition and application of the five-percent cap on administrative expenses associated with the RDF program. In addition, the Company was directed to file a proposal regarding this matter prior to, or as part of, the 2011 RDF rate rider filing.

In Docket No. E002/M-11-1007, the Commission established the calculation of the five-percent cap as follows:²⁷

1. **Actual and Forecasted Calculation.** For informational purposes, the administrative cap percentage will be calculated based on actual and forecasted administrative expenses and grant project disbursements from 2004 to, and including, the second forecasted year in each new annual RDF rate rider filing. Total administrative costs will be divided by total grant project disbursements to compute the overall administrative cap percentage.
2. **Actual Only Calculation.** For compliance purposes, the same computation as described above will be applied but only for actual administrative expenses and grant project disbursements from 2004 to, and including, the most recent year in which actual costs have been reported.

In Xcel's September 29, 2017 filing requesting approval of its 2018 RDF rate rider factor in Docket No. E002/M-17-712, the Company proposed to include RDF base-level administrative expenses of \$30,300 as known and measurable RDF administrative costs in 2018. These base-level administrative expenses cover an RDF grant administrator, RDF advisory group miscellaneous meeting expenses and Clean Energy States Alliance membership dues.

In its 2018 Order, the Commission required Xcel to remove \$28,009 (Minnesota Jurisdictional portion of the proposed \$30,300) in administrative costs from the tracker balance. As explained by Xcel, the Commission determined that the "2017 Legislation changes disallowed recovery of administrative costs."²⁸

As a result, the Company is not requesting recovery from its Minnesota electric customers for any RDF administrative costs in 2018, 2019 and 2020.

C. CALCULATION OF THE 2020 RDF RIDER RATE

1. 2018 Actual RDF/RDA Expenses

Attachment 1 of the Petition describes the Company's 2018 RDF/RDA expenses and associated recovery, including:

²⁷ Source: Commission's February 17, 2012 Order *In the Matter of a Petition for Approval of the Renewable Development Fund Annual Report, Tracker Account True-Up, and Request for New 2012 Rate Rider Factor* (Docket No. E002/M-11-1007).

²⁸ Source: Petition at page 18 of 58.

- \$29,687,700 in total RDF expenses,
- \$29,248,211 in RDF expenditures allocated to the Minnesota Jurisdiction,
- RDA transfer payment to MMB of \$8,817,885 in January 2018,
- \$3,053,218 in 2017 final true-up (surplus) to be recovered through the RDF Rider, and
- \$33,188,899 in 2018 RDF Rider revenues.

Based on the 2018 outcome of the Department's updated RDF tracker spreadsheet as summarized in Attachment 1 of these comments, the Department concludes that Xcel's calculations described above are generally reasonable.

2. 2019 Actual (January-August 2019) and Forecast (September-December 2019) RDF/RDA Expenses

Attachment 2 of the Petition describes the Company's 2019 RDF/RDA expenses and associated recovery. Actual results are reported for January to August and forecasts are reported for September to December. The 2019 RDF expenses and associated recovery include:

- \$27,204,178 in 2019 total RDF expenditures,
- \$26,476,097 in 2019 RDF expenditures allocated to the Minnesota Jurisdiction,
- RDA transfer payment to MMB of \$12,566,510 in January 2019,
- \$1,823,978 in 2018 final true-up (deficit) to be recovered through the RDF Rider, and
- \$40,143,405 in 2019 RDF Rider revenues.

Based on the 2019 outcome of the Department's updated RDF tracker spreadsheet as summarized in Attachment 2 of these comments, the Department concludes that Xcel's calculations described above are generally reasonable, except for the 2019 RDA transfer payment to MMB which was \$12,556,510.²⁹

3. 2020 Forecast

Attachment 3 of the Petition shows that the Company forecasts total 2020 RDF expenditures to be \$21,614,112 with RDF expenditures allocated to the Minnesota Jurisdiction to be \$21,603,535, and RDA transfer payment to MMB of \$14,852,115. After adding \$723,180 in estimated under-recovered RDF expenditures at the end of 2019 to the 2020 RDF/RDA expenditures allocated to the Minnesota Jurisdiction, the Company identified an amount of \$37,188,830 to be recovered in 2020. The Company then divided this amount by the 2020 sales forecast of 28,845,455,202 kWh to arrive at an RDF rate rider factor of \$0.001289 per kWh for 2020, for an expected cumulative balance of \$0 at the end of 2020.

Based on the 2020 outcome of the Department's updated RDF tracker spreadsheet as summarized in Attachment 3 of these comments, the Department concludes that Xcel's calculations described above

²⁹ Source: Xcel's February 11, 2019 compliance filing in Docket No. E002/M-18-628.

are generally reasonable, except for the total and the Minnesota Jurisdictional portion of the 2020 RDF expenditure and for the estimated under-recovered RDF expenditures at the end of 2019.

In addition to the corrected 2019 RDA transfer payment to MMB, the difference between the Department and Xcel's calculations stems from the forecasted payments under the Minnesota State Higher Education Block Grant (HE4-1). Xcel forecasted two \$1,050,000 payments (December 2019 and June 2020) to HE4-1 and included these payments in the Company's calculation of the 2020 rate rider factor for a total payment of \$6,550,000 to HE4-1.³⁰ The Department notes that the Commission-approved amount awarded to HE4-1 is \$5,500,000,³¹ not \$6,550,000, and that HE4-1 already received \$4,450,000 through March 2018. The remaining Commission-approved payment for HE4-1 is \$1,050,000, not \$2,100,000 as proposed by Xcel.

Attachment 3 of these comments shows the Department's calculation of the 2020 RDF rate rider factor, with the correct 2019 RDA transfer payment and when the recovery of the remaining payments to HE4-1 is limited to the December 2019 forecasted payment of \$1,050,000.

With these two corrections, the 2020 RDF rate rider factor should be \$0.001252/kWh, instead of Xcel's proposed \$0.001289/kWh.

The Department recommends that the Commission approve a 2020 RDF rate rider factor of \$0.001252/kWh.

D. COMPLIANCE FILING

Ordering Point 5 of the June 28, 2005 Order in Docket No. E002/M-05-109 requires Xcel to include the RDF annual reporting requirements from the Commission's December 23, 2002 Order (2002 Order) as part of its annual tracker account and true-up filing.³²

Ordering Point 2 of the 2002 Order requires Xcel to report for each Renewable Development Fund project:

- The total amount of money awarded from the fund for the project,
- A schedule of anticipated payments,
- The amount disbursed,
- The amounts recovered in the fuel clause,
- The amounts remaining to be recovered,
- Any adjustments to these amounts due to, for example, penalties or incentive payments provided for the terms of the proposal, and

³⁰ Source: Attachment 9 of the Petition.

³¹ Source: Attachment 11 of the Petition, page 2 of 3.

³² Order *Varying Rules to Permit Recovery of Renewable Development Fund Expenditures and Requiring Compliance Filing*, Docket No. E002/M-00-1583.

- Any disparities between the schedule of anticipated payments and actual payments.

Ordering Point 8 of the March 17, 2011 Order in Docket No. E002/M-10-1054 (2011 Order) requires Xcel to more accurately fulfill the reporting requirements of Ordering Point 3 in the Commission's 2002 Order. Specifically, Ordering Point 8 of the 2011 Order requires Xcel to report the following, which Xcel has done in its filing with the data indicated below:

Category	Amounts as of December 31, 2018³³
The total liability the Company has incurred under Minnesota Statutes 116C.779	\$359,450,000
The Company's aggregate payments for approved renewable development projects and legislative mandates	\$316,366,293
The total amount recovered through the fuel clause adjustment mechanism and RDF rate rider factor for RDF costs	\$12,202,440 (Fuel Clause) \$294,225,823 (RDF Rate Rider)
The unencumbered cumulative balance remaining in the fund	\$28,767,636

The Department concludes that Xcel has complied with the requirements above.

The Department notes that its calculations under Attachment 4 of these comments show similar amounts for:

- 1) Xcel's total 2018 liability (\$359,450,000 after adding Xcel's 2018 liability of \$32,500,000 to Xcel's total 2017 liability of \$326,950,000 as provided in Docket No. E002/M-18-628),
- 2) Xcel's aggregate payments (\$316,366,292), and
- 3) the unencumbered cumulative RDF balance as of December 31, 2018 (\$28,767,638).

The Department requests Xcel to provide in reply comments an estimate of the RDA balance and the unencumbered cumulative RDF balance as of December 31, 2019,³⁴ based on the data provided in the Petition.

IV. COMPLIANCE WITH THE 2018 ORDER

The 2018 Order required Xcel to separately itemize RDF and RDA expenses in future filings.

The Company identified separately the RDA transfer payments to MMB under Attachments 1-3 of the Petition. As a result, the Department concludes that Xcel complied with the above requirement of the 2018 Order.

³³ Source: Table 6 of Xcel's October 1, 2019 filing in Docket No. E002/M-19-609.

³⁴ In the same format as Attachment 13 of the Petition.

The Department notes that the current cumulative RDA balance, excluding any interest payments, is equal to \$8,817,885 + \$12,556,510, or \$21,374,395. The Department recommends that Xcel provide in reply comments the most up to date RDA balance, including any RDA-related interest payments received by MMB.

V. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission approve a 2020 RDF rate rider factor of \$0.001252/kWh.

The Department requests Xcel to provide in reply comments an estimate of the RDA balance and the unencumbered cumulative RDF balance as of December 31, 2019, based on the data provided in the Petition.

The Department also recommends that Xcel provide in reply comments the most up to date RDA balance, including any RDA-related interest payments received by MMB.

/ja

Attachment 1: Xcel's Actual 2018 RDF Budget (page 1 of 2)

Total Expense	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 969,741	\$ -	\$ -	\$ 1,650,000	\$ -	\$ 2,619,741
Total Cat A (EP)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 969,741	\$ -	\$ -	\$ 1,650,000	\$ -	\$ 2,619,741
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B4	\$ -	\$ -	\$ 56,514	\$ 521,162	\$ 410,345	\$ 250,414	\$ 146,474	\$ -	\$ -	\$ -	\$ 887,403	\$ 132,847	\$ 2,405,159
Cat Higher Ed.	\$ -	\$ -	\$ 2,050,000	\$ -	\$ -	\$ 719,072	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,769,072
Total Cat B (RD)	\$ -	\$ -	\$ 2,106,514	\$ 521,162	\$ 410,345	\$ 969,486	\$ 146,474	\$ -	\$ -	\$ -	\$ 887,403	\$ 132,847	\$ 5,174,231
RDA/MMB	\$ 8,817,885	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,817,885
116C.779 (1.f)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000
116C779 (1.g)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000
116C.7791	\$ -	\$ 49,770	\$ 97,296	\$ 334,657	\$ -	\$ 93,957	\$ 306,614	\$ -	\$ 74,004	\$ 662,648	\$ -	\$ 31,601	\$ 1,650,547
116C.7792	\$ 519,273	\$ 53,990	\$ 10,769	\$ 9,655	\$ 11,621	\$ 17,019	\$ 9,701	\$ 26,773	\$ 10,452	\$ 11,321	\$ 9,889	\$ 35,190	\$ 725,653
216B.1691 (2f)	\$ -	\$ -	\$ 77,123	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 77,123
216C.41 (REPI)	\$ 61,557	\$ 64,817	\$ 74,731	\$ 53,956	\$ 135,592	\$ 46,297	\$ 60,587	\$ 64,833	\$ 78,031	\$ 84,370	\$ 66,124	\$ 49,510	\$ 840,405
Subtotal	\$ 580,830	\$ 168,577	\$ 259,919	\$ 398,268	\$ 147,213	\$ 14,757,273	\$ 4,376,902	\$ 91,606	\$ 162,487	\$ 758,339	\$ 76,013	\$ 116,301	\$ 21,893,728
Total Cost	\$ 9,398,715	\$ 168,577	\$ 2,366,433	\$ 919,430	\$ 557,558	\$ 15,726,759	\$ 4,523,376	\$ 1,061,347	\$ 162,487	\$ 758,339	\$ 2,613,416	\$ 249,148	\$ 38,505,585
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Adm Costs 4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Adm Costs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total RDF Cost	\$ 9,398,715	\$ 168,577	\$ 2,366,433	\$ 919,430	\$ 557,558	\$ 15,726,759	\$ 4,523,376	\$ 1,061,347	\$ 162,487	\$ 758,339	\$ 2,613,416	\$ 249,148	\$ 38,505,585

Attachment 1: Xcel's Actual 2018 RDF Budget (page 2 of 2)

MN Expense	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 814,971	\$ -	\$ -	\$ 1,365,281	\$ -	\$ 2,180,252
Total Cat A	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 814,971	\$ -	\$ -	\$ 1,365,281	\$ -	\$ 2,180,252
Total Cat B (RD)	\$ -	\$ -	\$ 2,106,514	\$ 521,162	\$ 410,345	\$ 969,486	\$ 146,474	\$ -	\$ -	\$ -	\$ 887,403	\$ 132,847	\$ 5,174,231
RDA/MMB	\$ 8,817,885	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,817,885
116C.779 (1.f)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000
116C779 (1.g)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000
116C.7791	\$ -	\$ 49,770	\$ 97,296	\$ 334,657	\$ -	\$ 93,957	\$ 306,614	\$ -	\$ 74,004	\$ 662,648	\$ -	\$ 31,601	\$ 1,650,547
116C.7792	\$ 519,273	\$ 53,990	\$ 10,769	\$ 9,655	\$ 11,621	\$ 17,019	\$ 9,701	\$ 26,773	\$ 10,452	\$ 11,321	\$ 9,889	\$ 35,190	\$ 725,653
216B.1691 (2f)	\$ -	\$ -	\$ 77,123	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 77,123
216C.41 (REPI)	\$ 61,557	\$ 64,817	\$ 74,731	\$ 53,956	\$ 135,592	\$ 46,297	\$ 60,587	\$ 64,833	\$ 78,031	\$ 84,370	\$ 66,124	\$ 49,510	\$ 840,405
Subtotal	\$ 580,830	\$ 168,577	\$ 259,919	\$ 398,268	\$ 147,213	\$ 14,757,273	\$ 4,376,902	\$ 91,606	\$ 162,487	\$ 758,339	\$ 76,013	\$ 116,301	\$ 21,893,728
Total Cost	\$ 9,398,715	\$ 168,577	\$ 2,366,433	\$ 919,430	\$ 557,558	\$ 15,726,759	\$ 4,523,376	\$ 906,577	\$ 162,487	\$ 758,339	\$ 2,328,697	\$ 249,148	\$ 38,066,096
Total Adm Costs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total RDF Cost	\$ 9,398,715	\$ 168,577	\$ 2,366,433	\$ 919,430	\$ 557,558	\$ 15,726,759	\$ 4,523,376	\$ 906,577	\$ 162,487	\$ 758,339	\$ 2,328,697	\$ 249,148	\$ 38,066,096

OVERALL 2018 RDF TRACKER

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Previous True Up	\$(3,053,216)												\$(3,053,216)
Expense	\$ 9,398,715	\$ 168,577	\$ 2,366,433	\$ 919,430	\$ 557,558	\$ 15,726,759	\$ 4,523,376	\$ 906,577	\$ 162,487	\$ 758,339	\$ 2,328,697	\$ 249,148	\$ 38,066,096
Revenue	\$ 2,934,832	\$ 2,446,721	\$ 2,597,576	\$ 2,337,973	\$ 2,382,259	\$ 2,716,723	\$ 3,060,348	\$ 3,101,917	\$ 2,658,115	\$ 2,874,592	\$ 2,812,328	\$ 3,265,515	\$ 33,188,899
Other Refund	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Project Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cumul. Balance	\$ 3,410,667	\$ 1,132,523	\$ 901,380	\$ (517,163)	\$ (2,341,864)	\$ 10,668,172	\$ 12,131,200	\$ 9,935,861	\$ 7,440,233	\$ 5,323,980	\$ 4,840,349	\$ 1,823,982	\$ 1,823,982

Input Data Source:

Xcel's electronic copy of the October 1, 2019 filing in Docket No. E002/M-19-609.

(*) Revenues attributable to RDF contracts, investments or expenditures under Minnesota Statute Section 216B.1645, subdivision 2(a).

(**) Net Expenses = Previous True Up + Expense - Other Refund - Project Revenues

Attachment 2: Xcel's Forecasted 2019 RDF Budget with the Correct 2019 RDA Transfer to MMB (page 1 of 2)

Total Expense	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Total 2019
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ -	\$ -	\$ 511,229	\$ -	\$ -	\$ 917,250	\$ -	\$ 2,233,654	\$ -	\$ -	\$ -	\$ 710,551	\$ 4,372,684
Total Cat A (EP)	\$ -	\$ -	\$ 511,229	\$ -	\$ -	\$ 917,250	\$ -	\$ 2,233,654	\$ -	\$ -	\$ -	\$ 710,551	\$ 4,372,684
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B4	\$ 108,946	\$ -	\$ 15,100	\$ -	\$ -	\$ -	\$ 167,090	\$ 309,210	\$ 783,171	\$ 169,653	\$ 947,980	\$ 1,942,034	\$ 4,443,184
Cat Higher Ed.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,050,000	\$ 1,050,000
Total Cat B (RD)	\$ 108,946	\$ -	\$ 15,100	\$ -	\$ -	\$ -	\$ 167,090	\$ 309,210	\$ 783,171	\$ 169,653	\$ 947,980	\$ 2,992,034	\$ 5,493,184
RDA/MMB	\$12,556,510	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$12,556,510
116C.779 (1.f)	\$ -	\$ -	\$ -	\$ -	\$ 6,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,500,000
116C.779 (1.g)	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ -	\$ -	\$ 230,377	\$ -	\$ 33,327	\$ 72,388	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 336,092
116C.7792	\$ 706,557	\$ 327,418	\$ 6,971	\$ 257,891	\$ (104,596)	\$ 24,078	\$ 13,851	\$ 805,939	\$ 3,261	\$ 847	\$ 11,847	\$ 1,215,763	\$ 3,269,827
216B.1691 (2f)	\$ -	\$ -	\$ 39,210	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 39,210
216C.41 (REPI)	\$ 54,166	\$ 81,252	\$ 68,879	\$ 59,416	\$ 42,298	\$ -	\$ 5,133	\$ 42,230	\$ 9,952	\$ 9,952	\$ 9,952	\$ 9,952	\$ 393,182
Subtotal	\$ 760,723	\$ 408,670	\$ 345,437	\$ 317,307	\$13,271,029	\$ 96,466	\$ 18,984	\$ 848,169	\$ 13,213	\$ 10,799	\$ 21,799	\$ 1,225,715	\$17,338,311
Total Cost	\$13,426,179	\$ 408,670	\$ 871,766	\$ 317,307	\$13,271,029	\$ 1,013,716	\$ 186,074	\$ 3,391,033	\$ 796,384	\$ 180,452	\$ 969,779	\$ 4,928,300	\$39,760,689
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Adm Costs 4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Adm Costs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total RDF Cost	\$13,426,179	\$ 408,670	\$ 871,766	\$ 317,307	\$13,271,029	\$ 1,013,716	\$ 186,074	\$ 3,391,033	\$ 796,384	\$ 180,452	\$ 969,779	\$ 4,928,300	\$39,760,689

Attachment 2: Xcel's Forecasted 2019 RDF Budget with the cCorrect 2019 RDA Transfer to MMB (page 2 of 2)

MN Expense	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Total 2019
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ -	\$ -	\$ 424,409	\$ -	\$ -	\$ 769,500	\$ -	\$ 1,862,188	\$ -	\$ -	\$ -	\$ 588,506	\$ 3,644,603
Total Cat A	\$ -	\$ -	\$ 424,409	\$ -	\$ -	\$ 769,500	\$ -	\$ 1,862,188	\$ -	\$ -	\$ -	\$ 588,506	\$ 3,644,603
Total Cat B (RD)	\$ 108,946	\$ -	\$ 15,100	\$ -	\$ -	\$ -	\$ 167,090	\$ 309,210	\$ 783,171	\$ 169,653	\$ 947,980	\$ 2,992,034	\$ 5,493,184
RDA/MMB	\$12,556,510	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$12,556,510
116C.779 (1.f)	\$ -	\$ -	\$ -	\$ -	\$ 6,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,500,000
116C.779 (1.g)	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ -	\$ -	\$ 230,377	\$ -	\$ 33,327	\$ 72,388	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 336,092
116C.7792	\$ 706,557	\$ 327,418	\$ 6,971	\$ 257,891	\$ (104,596)	\$ 24,078	\$ 13,851	\$ 805,939	\$ 3,261	\$ 847	\$ 11,847	\$ 1,215,763	\$ 3,269,827
216B.1691 (2f)	\$ -	\$ -	\$ 39,210	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 39,210
216C.41 (REPI)	\$ 54,166	\$ 81,252	\$ 68,879	\$ 59,416	\$ 42,298	\$ -	\$ 5,133	\$ 42,230	\$ 9,952	\$ 9,952	\$ 9,952	\$ 9,952	\$ 393,182
Subtotal	\$ 760,723	\$ 408,670	\$ 345,437	\$ 317,307	\$13,271,029	\$ 96,466	\$ 18,984	\$ 848,169	\$ 13,213	\$ 10,799	\$ 21,799	\$ 1,225,715	\$17,338,311
Total Cost	\$13,426,179	\$ 408,670	\$ 784,945	\$ 317,307	\$13,271,029	\$ 865,966	\$ 186,074	\$ 3,019,568	\$ 796,384	\$ 180,452	\$ 969,779	\$ 4,806,255	\$39,032,608
Total Adm Costs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total RDF Cost	\$13,426,179	\$ 408,670	\$ 784,945	\$ 317,307	\$13,271,029	\$ 865,966	\$ 186,074	\$ 3,019,568	\$ 796,384	\$ 180,452	\$ 969,779	\$ 4,806,255	\$39,032,608

OVERALL 2019 RDF TRACKER

	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Total 2019
Previous True Up	\$ 1,823,982												\$ 1,823,982
Expense	\$13,426,179	\$ 408,670	\$ 784,945	\$ 317,307	\$13,271,029	\$ 865,966	\$ 186,074	\$ 3,019,568	\$ 796,384	\$ 180,452	\$ 969,779	\$ 4,806,255	\$39,032,608
Revenue	\$ 3,584,292	\$ 3,218,752	\$ 3,665,386	\$ 3,234,214	\$ 3,056,546	\$ 3,040,659	\$ 3,825,111	\$ 3,807,105	\$ 3,232,459	\$ 3,090,727	\$ 3,005,120	\$ 3,383,036	\$40,143,405
Other Refund	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Project Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cumul. Balance	\$ 11,665,868	\$ 8,855,787	\$ 5,975,346	\$ 3,058,440	\$ 13,272,924	\$ 11,098,231	\$ 7,459,194	\$ 6,671,656	\$ 4,235,582	\$ 1,325,307	\$ (710,035)	\$ 713,185	\$ 713,185

Input Data Source:

Xcel's electronic copy of the October 1, 2019 filing in Docket No. E002/M-19-609.

(*) Revenues attributable to RDF contracts, investments or expenditures under Minnesota Statute Section 216B.1645, subdivision 2(a).

(**) Net Expenses = Previous True Up + Expense - Other Refund - Project Revenues

Attachment 3: Xcel's Forecasted 2020 RDF Budget with DOC's Adjustments (page 1 of 2)

Total Expense	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Total 2020
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ -	\$ 61,320	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 61,320
Total Cat A (EP)	\$ -	\$ 61,320	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 61,320
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B4	\$ 204,107	\$ 197,574	\$ 279,253	\$ 37,629	\$ 73,628	\$ 153,526	\$ 48,257	\$ 100,000	\$ 160,933	\$ -	\$ 100,000	\$ -	\$ 1,354,907
Cat Higher Ed.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cat B (RD)	\$ 204,107	\$ 197,574	\$ 279,253	\$ 37,629	\$ 73,628	\$ 153,526	\$ 48,257	\$ 100,000	\$ 160,933	\$ -	\$ 100,000	\$ -	\$ 1,354,907
RDA/MMB	\$14,852,115	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$14,852,115
116C.779 (1.f)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,500,000
116C.779 (1.g)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ 21,578	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 21,578
116C.7792	\$ 5,205,472	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,205,472
216C.41 (REPI)	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 620,832
Subtotal	\$ 5,278,786	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$13,351,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$19,147,882
Total Cost	\$20,335,008	\$ 310,630	\$ 330,989	\$ 89,365	\$ 125,364	\$ 205,262	\$13,399,993	\$ 151,736	\$ 212,669	\$ 51,736	\$ 151,736	\$ 51,736	\$35,416,224
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Adm Costs 4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Adm Costs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total RDF Cost	\$20,335,008	\$ 310,630	\$ 330,989	\$ 89,365	\$ 125,364	\$ 205,262	\$13,399,993	\$ 151,736	\$ 212,669	\$ 51,736	\$ 151,736	\$ 51,736	\$35,416,224

Attachment 3: Xcel's Forecasted 2020 RDF Budget with DOC's Adjustments (page 2 of 2)

MN Expense	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Total 2020
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ -	\$ 50,743	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 50,743
Total Cat A	\$ -	\$ 50,743	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 50,743
Total Cat B (RD)	\$ 204,107	\$ 197,574	\$ 279,253	\$ 37,629	\$ 73,628	\$ 153,526	\$ 48,257	\$ 100,000	\$ 160,933	\$ -	\$ 100,000	\$ -	\$ 1,354,907
RDA/MMB	\$14,852,115	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$14,852,115
116C.779 (1.f)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,500,000
116C.779 (1.g)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ 21,578	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 21,578
116C.7792	\$ 5,205,472	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,205,472
216C.41 (REPI)	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 620,832
Subtotal	\$ 5,278,786	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 13,351,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 51,736	\$ 19,147,882
Total Cost	\$ 20,335,008	\$ 300,053	\$ 330,989	\$ 89,365	\$ 125,364	\$ 205,262	\$ 13,399,993	\$ 151,736	\$ 212,669	\$ 51,736	\$ 151,736	\$ 51,736	\$ 35,405,647
Total Adm Costs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total RDF Cost	\$ 20,335,008	\$ 300,053	\$ 330,989	\$ 89,365	\$ 125,364	\$ 205,262	\$ 13,399,993	\$ 151,736	\$ 212,669	\$ 51,736	\$ 151,736	\$ 51,736	\$ 35,405,647

OVERALL 2020 RDF TRACKER

	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Total 2020
Previous True Up	\$ 713,185												\$ 713,185
Expense	\$ 20,335,008	\$ 300,053	\$ 330,989	\$ 89,365	\$ 125,364	\$ 205,262	\$ 13,399,993	\$ 151,736	\$ 212,669	\$ 51,736	\$ 151,736	\$ 51,736	\$ 35,405,647
Revenue	\$ 3,115,474	\$ 2,790,204	\$ 2,976,314	\$ 2,620,729	\$ 2,799,473	\$ 3,168,315	\$ 3,629,550	\$ 3,479,800	\$ 2,931,007	\$ 2,799,931	\$ 2,727,498	\$ 3,080,537	\$ 36,118,832
Other Refund	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Project Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cumul. Balance	\$ 17,932,719	\$ 15,442,568	\$ 12,797,243	\$ 10,265,879	\$ 7,591,770	\$ 4,628,717	\$ 14,399,160	\$ 11,071,096	\$ 8,352,758	\$ 5,604,563	\$ 3,028,801	\$ (0)	\$ (0)

Net Expenses** (Thousands)	\$ 36,119
MWh Sales	28,845,455
2020 Factor	0.001252

Input Data Source:

Xcel's electronic copy of the October 1, 2019 filing in Docket No. E002/M-19-609.

(*) Revenues attributable to RDF contracts, investments or expenditures under Minnesota Statute Section 216B.1645, subdivision 2(a).

(**) Net Expenses = Previous True Up + Expense - Other Refund - Project Revenues

Attachment 4 (page 1 of 2)

Actual RDF Grant Payments, Administrative Costs, Other Legislative Mandates Expenditures, Grants Awarded and Unencumbered Cumulative Balance (UCB) as of December 31, 2018

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
1. RDF Grant Payments	\$ 5,782,469	\$1,917,257	\$3,761,910	\$ 6,753,409	\$10,384,215	\$ 3,238,626	\$ 7,533,073	\$ 8,326,385	\$ 6,943,768	\$ 1,902,838	\$ 3,142,993	\$ 680,843
Category A1	\$ 3,759,426	\$ 221,000	\$ 196,000	\$ 965,000	\$ 400,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Category A2	\$ -	\$ -	\$ -	\$ 400,000	\$ 3,436,360	\$ (520,000)	\$ 242,730	\$ 40,910	\$ 1,500,000	\$ -	\$ 344,175	\$ 592,355
Category A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 735,000	\$ 205,090	\$ 3,161,687	\$ 2,400,806	\$ 476,376	\$ 2,118,409	\$ -
Category A4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
a. Total Category A	\$ 3,759,426	\$ 221,000	\$ 196,000	\$ 1,365,000	\$ 3,836,360	\$ 215,000	\$ 447,820	\$ 3,202,597	\$ 3,900,806	\$ 476,376	\$ 2,462,584	\$ 592,355
Category B1	\$ 2,023,043	\$1,696,257	\$1,410,663	\$ 607,119	\$ 284,012	\$ 62,748	\$ 46,619	\$ -	\$ -	\$ -	\$ -	\$ -
Category B2	\$ -	\$ -	\$ 155,247	\$ 2,781,290	\$ 4,556,661	\$ 2,470,102	\$ 939,061	\$ 201,306	\$ -	\$ 197,741	\$ 31,619	\$ -
Category B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 100,000	\$ 2,928,538	\$ 4,191,475	\$ 3,042,962	\$ 1,228,721	\$ 648,790	\$ 88,488
Category B4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Category Higher Education	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
b. Total Category B	\$ 2,023,043	\$1,696,257	\$1,565,910	\$ 3,388,409	\$ 4,840,673	\$ 2,632,850	\$ 3,914,218	\$ 4,392,781	\$ 3,042,962	\$ 1,426,462	\$ 680,409	\$ 88,488
c. Excelsior	\$ -	\$ -	\$2,000,000	\$ 2,000,000	\$ 1,707,182	\$ 390,776	\$ 3,171,035	\$ 731,007	\$ -	\$ -	\$ -	\$ -
2. Administrative Costs	\$ 207,922	\$ 342,318	\$ 135,367	\$ 188,680	\$ 431,953	\$ 225,704	\$ 118,052	\$ 147,233	\$ 139,627	\$ 101,532	\$ 178,458	\$ 24,781
3. Other Legis. Mandates	\$10,037,785	\$1,513,010	\$4,460,425	\$ 8,015,780	\$ 9,481,846	\$16,673,693	\$16,744,988	\$15,619,529	\$14,729,047	\$13,325,940	\$ 9,531,959	\$21,460,069
Un. of Minnesota/IREE	\$10,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,500,000	\$ 5,000,000	\$ 5,000,000	\$ 2,500,000	\$ -	\$ -
216C.41 (REPI)	\$ 37,785	\$1,513,010	\$4,310,425	\$ 8,015,780	\$ 9,669,335	\$ 9,048,693	\$ 9,757,488	\$ 9,632,029	\$ 9,034,006	\$ 9,017,890	\$ 7,412,900	\$ 5,696,935
AURI Biofuel	\$ -	\$ -	\$ 150,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
MPCA Deposit	\$ -	\$ -	\$ -	\$ -	\$ (4,000,000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Next Generation Initiative	\$ -	\$ -	\$ -	\$ -	\$ 3,812,511	\$ 7,625,000	\$ 3,812,500	\$ -	\$ -	\$ -	\$ -	\$ -
REP Admin. by DOC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 675,000	\$ 987,500	\$ 312,500	\$ -	\$ -	\$ -
116C.7791 (Solar Rebates)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 382,541	\$ 1,808,051	\$ 2,119,059	\$ 3,686,335
216C.412 (Made in Minnesota)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$12,021,295
116C.7792 (Solar Incentives)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 55,503
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779, subd. 1f (City Benson)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779, subd. 1g (LEA PPA)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
216B.1691 (2f)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779, subd. 1 (RDA/MMB)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total RDF Cost (1+2+3)	\$16,028,176	\$3,772,585	\$8,357,702	\$14,957,869	\$20,298,014	\$20,138,023	\$24,396,113	\$24,093,147	\$21,812,442	\$15,330,311	\$12,853,410	\$22,165,693

Attachment 4 (page 2 of 2)

Actual RDF Grant Payments, Administrative Costs, Other Legislative Mandates Expenditures, Grants Awarded and Unencumbered Cumulative Balance (UCB) as of December 31, 2018

	2015	2016	2017	2018	Payments 2003-2018	Grant Awards	Unused Awards	Unencumbered Awards
1. RDF Grant Payments	\$ 2,809,764	\$ 10,917,324	\$ 4,465,369	\$ 7,793,972	\$ 86,354,215	\$ 107,066,638	\$ 6,396,353	\$ 100,670,285
Category A1	\$ -	\$ -	\$ -	\$ -	\$ 5,541,426	\$ 9,302,835	\$ 3,761,409	\$ 5,541,426
Category A2	\$ -	\$ -	\$ -	\$ -	\$ 6,036,530	\$ 7,636,530	\$ 1,600,000	\$ 6,036,530
Category A3	\$ -	\$ -	\$ -	\$ -	\$ 9,097,368	\$ 9,112,402	\$ 15,034	\$ 9,097,368
Category A4	\$ 1,072,213	\$ 5,425,476	\$ 2,545,280	\$ 2,619,741	\$ 11,662,710	\$ 18,738,922	\$ -	\$ 18,738,922
a. Total Category A	\$ 1,072,213	\$ 5,425,476	\$ 2,545,280	\$ 2,619,741	\$ 32,338,034	\$ 44,790,689	\$ 5,376,443	\$ 39,414,246
Category B1	\$ -	\$ -	\$ -	\$ -	\$ 6,130,461	\$ 6,247,566	\$ 117,105	\$ 6,130,461
Category B2	\$ -	\$ -	\$ -	\$ -	\$ 11,333,027	\$ 11,804,466	\$ 471,439	\$ 11,333,027
Category B3	\$ 737,551	\$ -	\$ -	\$ -	\$ 12,966,525	\$ 13,397,891	\$ 431,366	\$ 12,966,525
Category B4	\$ -	\$ 653,705	\$ 920,089	\$ 2,405,159	\$ 3,978,953	\$ 10,168,811	\$ -	\$ 10,168,811
Category Higher Education	\$ 1,000,000	\$ 4,838,143	\$ 1,000,000	\$ 2,769,072	\$ 9,607,215	\$ 10,657,215	\$ -	\$ 10,657,215
b. Total Category B	\$ 1,737,551	\$ 5,491,848	\$ 1,920,089	\$ 5,174,231	\$ 44,016,181	\$ 52,275,949	\$ 1,019,910	\$ 51,256,039
c. Excelsior	\$ -	\$ -	\$ -	\$ -	\$ 10,000,000	\$ 10,000,000	\$ -	\$ 10,000,000
2. Administrative Costs	\$ 15,742	\$ 25,343	\$ 17,051	\$ -	\$ 2,299,763			
3. Other Legis. Mandates	\$ 20,684,911	\$ 18,941,736	\$ 15,779,982	\$ 30,711,613	\$ 227,712,313			
Un. of Minnesota/IREE	\$ -	\$ -	\$ -	\$ -	\$ 25,000,000			
216C.41 (REPI)	\$ 4,652,960	\$ 2,831,220	\$ 1,169,306	\$ 840,405	\$ 92,640,167			
AURI Biofuel	\$ -	\$ -	\$ -	\$ -	\$ 150,000			
MPCA Deposit	\$ -	\$ -	\$ -	\$ -	\$ (4,000,000)			
Next Generation Initiative	\$ -	\$ -	\$ -	\$ -	\$ 15,250,011			
REP Admin. by DOC	\$ -	\$ -	\$ -	\$ -	\$ 1,975,000			
116C.7791 (Solar Rebates)	\$ 3,950,536	\$ 3,513,790	\$ 2,149,212	\$ 1,650,547	\$ 19,260,071			
216C.412 (Made in Minnesota)	\$ 12,014,671	\$ 12,073,296	\$ 11,868,026	\$ -	\$ 47,977,288			
116C.7792 (Solar Incentives)	\$ 66,743	\$ 523,430	\$ 593,439	\$ 725,653	\$ 1,964,768			
DEED	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000			
116C.779, subd. 1f (City Benson)	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000			
116C.779, subd. 1g (LEA PPA)	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000			
216B.1691 (2f)	\$ -	\$ -	\$ -	\$ -	\$ 77,123			
116C.779, subd. 1 (RDA/MMB)	\$ -	\$ -	\$ -	\$ -	\$ 8,817,885			
	\$ 23,510,416	\$ 29,884,404	\$ 20,262,402	\$ 38,505,585	\$ 316,366,292			

As of December 31, 2018

1. Cumulative RDF/RDA Obligation in 1000s \$	\$ 359,450
2. Total RDF Administrative Costs Paid in 1000s \$	\$ 2,300
3. Amount of Unencumbered Awards in 1000s \$	\$ 100,670
4. Amount of Other Legislative Mandates Paid in 1000s \$	\$ 227,712
5. Unencumbered Cumulative RDF Balance	\$ 28,767,638
6. Cumulative RDA Balance	\$ 8,817,885

(5) = (1)-(2)-(3)-(4)