August 24, 2023 **PUBLIC DOCUMENT**

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **PUBLIC Response Comments**
Minnesota Department of Commerce, Division of Energy Resources
Docket No. E002/AA-23-153

Dear Mr. Seuffert:

Attached are the **PUBLIC** response comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) regarding the March 1, 2023 petition by Northern States Power Company, doing business as Xcel Energy (Xcel) in Docket No. E002/AA-23-153, requesting approval of Xcel's 2024 monthly fuel clause adjustment rates and associated forecasts. Lisa R. Peterson, Xcel's Director of Regulatory Pricing and Analysis, filed the petition.

The Department recommends the Minnesota Public Utilities Commission (Commission) approve Xcel's FCA 2024 forecast petition subject to additional reporting in future Xcel FCA true-up petitions. The Department is available to answer any questions the Commission may have in this matter.

Sincerely,

/s/ STEPHEN COLLINS
Financial Analyst

SC/ar
Attachment

Before the Minnesota Public Utilities Commission

PUBLIC Response Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/AA-23-153

I. INTRODUCTION

On May 1, 2023, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed a petition requesting the Minnesota Public Utilities Commission (Commission) approve 2024 forecasted fuel costs and monthly fuel charges, subject to true-up. Xcel also proposes to implement the monthly rate changes on the first day of each month for the 12 months beginning January 1, 2024 and update the FCA tariff sheet to reflect the monthly fuel cost charges to be implemented based on the Commission's decisions in this proceeding. Xcel will provide a final tariff sheet in a compliance filing within 10 days after the Order is received.

On June 29, 2023, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed comments on Xcel's petition. The Department provided initial recommendations, requested additional information from Xcel, and stated it would provide final recommendations after reviewing Xcel's reply comments providing the additional information and Xcel's updated forecast.

On July 31, 2023, Xcel filed reply comments, in which Xcel provided additional information, updated several inputs to its 2024 forecast, and requested the Commission approve the updated forecast and resulting 2024 monthly FCA rates.[1]

The Department files these response comments in compliance with the procedural schedule below, as referenced in the Department's initial comments.

2023 May 2	Utilities submit 2024 forecast and rates
2023 June 30	Review & initial comments by consumer advocates of 2024 rates
2023 July 30	Utility reply comments on 2024 rates (forecast inputs updated)
2023 Aug. 30	**Response by consumer advocates for 2024 rates**
2023 Nov. 30	Commission's order on 2024 rates
2023 Dec. 1	Publication of 2024 rates
2024 Jan. 1	Implement 2024 rates

[1] Xcel Reply Comments, Attachment A, page 2 of 4.

II. SUMMARY OF XCEL'S REPLY COMMENTS

A. OVERVIEW

Department Table 1 below shows Xcel's approved forecasts and costs in each year, with a comparison to this year's 2024 forecast. Xcel's initial petition in the instant docket requested 2024 forecasted costs of $1,030.3 million and unit costs of $38.38 per megawatt-hour (MWh). Xcel's reply comments updated this request to 2024 forecasted costs of $1,022.7 million[2] and unit costs of $38.10/MWh.[3]

Department Table 1:
Xcel FCA Forecasted and Actual Costs: 2020-2024

Year	Docket	Forecasted Cost	Actual Cost	Forecast Unit Cost	Actual Unit Cost	Actual Recoveries	Over/(Under) Recovery
		$ millions		$/MWh		$ millions	
2020	19-293	796.1	746.3	27.81	27.07	741.3	(5.0)
2021	20-417	749.7	894.1	27.78	31.71	812.3	(81.8)
2022	21-295	849.4	950.2	31.47	33.55	954.0	3.8
2023	22-179	1,069.2 → 1,039.2	TBD	38.96 → 37.87	TBD	TBD	TBD
2024	23-153	1,022.7*	TBD	38.10*	TBD	TBD	TBD

*Instant petition (not yet approved)

Xcel's reply comments provided Attachments A, B, and C to summarize the Company's updated forecast, which Xcel stated correspond to Part A, Attachments 1, 2, and 3 of the initial forecast petition.

As summarized on pages 10-11 of the reply comments, Xcel's main input updates were coal prices, natural gas prices, MISO prices, MISO charges, and outage costs. The Department reviews these input updates in section IV of these response comments.

B. FCA COST SUMMARY

Xcel provided its initial forecasted 2024 FCA cost summary in Part A, Attachment 1, page 1 of 3, of the instant petition. Xcel updated this summary in Attachment A, page 1 of 4, of its reply comments.

Department Table 2 below summarizes Xcel's FCA costs for its 2024 forecast as updated in Xcel's reply comments, its approved 2023 forecast, as well as 2020-2022 actuals and averages. This table is an updated version of the table on page 13 of the Department's initial comments.

[2] Xcel Reply Comments, Attachment A, page 1 of 4, line 67.
[3] *Id.*, line 73.

Department Table 2:
Updated Xcel Forecasted 2024 FCA Cost Summary (in 1000's)

				2024 Forecast*	2023 Forecast**	2022	2021	2020	2020-22 Avg.
						Actuals***			
				[TRADE SECRET DATA EXCISED					
1		Own Generation	$			$ 633,483	$ 563,490	$ 450,934	$ 549,303
2	+	LT Purchased Energy	$			$ 878,971	$ 789,560	$ 459,843	$ 709,458
3	+	LT CSG Energy	$	$ 329,263	$ 286,939	$ 184,030	$ 183,652	$ 151,466	$ 173,049
4	+	ST Market Purchases	$			$ 146,773	$ 85,141	$ 108,791	$ 113,568
5	=	Total System Costs	$			$ 1,843,257	$ 1,621,843	$ 1,171,034	$ 1,545,378
6	-	Sales Revenues****	$			$ (564,368)	$ (437,200)	$ (200,170)	$ (400,579)
7	-	CSG-AMC	$	$ (249,377)	$ (188,579)	$ (99,903)	$ (110,745)	$ (130,594)	$ (113,747)
8	-	R*C Pilot	$			$ (6,291)	$ (6,190)	$ (6,139)	$ (6,207)
9	-	R*C MTM	$			$ (18,190)	$ (12,169)	$ (9,474)	$ (13,278)
10	-	R*C LT	$			$ -	$ -	$ -	$ -
11	=	Net System FCA Costs	$			$ 1,154,506	$ 1,055,539	$ 824,657	$ 1,011,567
12		Total System Sales	MWh			40,363,073	39,923,939	39,033,390	39,773,467
13	-	R*C Pilot Sales	MWh			(183,231)	(177,779)	(182,541)	(181,184)
14	-	R*C MTM Sales	MWh			(493,276)	(440,556)	(394,474)	(442,769)
15	-	R*C LT Sales	MWh			0	0	0	0
16		Net System Sales	MWh	38,197,851	38,739,103	39,686,566	39,305,604	38,456,375	39,149,515
17		**Net System FCA Unit Costs**	**$/MWh**			$29.09	$26.85	$21.44	$25.84
18		MN Sales	MWh			28,994,856	28,814,204	28,141,221	28,650,094
19	-	R*C Pilot Sales	MWh			(183,231)	(177,779)	(182,541)	(181,184)
20	-	R*C MTM Sales	MWh			(493,276)	(440,556)	(394,474)	(442,769)
21	-	R*C LT Sales	MWh			0	0	0	0
22		Net MN Sales	MWh	26,842,355	27,443,347	28,318,349	28,195,869	27,564,206	28,026,141
23		MN FCA Costs	$			$ 824,270	$ 758,124	$ 591,397	$ 724,597
24	+	CSG-AMC	$	$ 249,377	$ 188,579	$ 99,883	$ 110,646	$ 130,420	$ 113,650
25	+	Laurentian Buyout	$			$ 13,062	$ 13,192	$ 13,134	$ 13,129
26	+	Pine Bend Buyout	$			$ -	$ -	$ 113	$ 38
27	+	Benson Buyout	$			$ 9,844	$ 10,249	$ 10,452	$ 10,182
28	+	SES Exem. Rec. & Saver's Switch Adj	$			$ 3,162	$ 1,834	$ 777	$ 1,924
29		Net MN FCA Costs	$	$ 1,022,748	$ 1,069,246	$ 950,221	$ 894,044	$ 746,292	$ 863,519
30		**Net MN FCA Unit Costs**	**$/MWh**	$38.10	$38.96	$33.55	$31.71	$27.07	$30.81
31		**MN FCA Premium Unit Costs*******	**$/MWh**			**$4.46**	**$4.85**	**$5.63**	**$4.97**
				TRADE SECRET DATA EXCISED]					

* Xcel Reply Comments and response to Department IR 2(a) updated over email on June 19, 2023
** Xcel's July 29, 2022 Reply Comments, Attachment A, in Docket No. E002/AA-22-179.
*** Xcel's response to Department IR 2(a) updated over emal on June 19, 2023
**** Revenues received from MISO attributable to the Company's asset-based sales.
***** The costs of CSGs and biomass buyout costs are both solely assigned to the Minnesota jurisdiction.

Relative to Xcel's initial FCA cost summary, forecasted sales are the same and forecasted costs are slightly lower, resulting in slightly lower forecasted unit costs. A key input in the change in costs is 4.8% lower forecasted natural gas commodity prices, which results in lower unit costs for owned and purchased natural gas generation. Lower-than-forecasted gas prices also result in 3.5% lower forecasted LMPs[4] and a reduction in forecasted 2024 asset-based margins from **[TRADE SECRET DATA EXCISED]**.[5] Other factors impacting costs are a decrease in forecasted congestion and outage costs. To a minor degree, the overall net decrease in costs is offset by a 1.1% increase in forecasted unit costs for owned coal-generation.[6]

III. RESPONSE TO XCEL

A. ASSET-BASED MARGINS

As noted above, Xcel is now forecasting 2024 asset-based margins of **[TRADE SECRET DATA EXCISED]** which is lower than its original forecast of **[TRADE SECRET DATA EXCISED]** due to lower forecasted gas prices causing lower forecasted LMPs. As noted in the Department's initial comments, Xcel's forecasted 2024 asset-based margins are also considerably lower than Xcel's actual 2022 asset-based margins of **[TRADE SECRET DATA EXCISED]**.

Xcel provided an initial discussion related to the connection between LMPs and asset-based margins in its initial petition (page 15). However, the Department's initial comments required additional clarity and that Xcel fully explain the difference in forecasted 2024 asset-based margins compared to Xcel's actual 2022 asset-based margins, given the stark difference.

Xcel's reply comments clarified that LMPs and asset-based margins are positively correlated when the change in LMPs is driven by natural gas prices. In other words: when LMPs increase due to natural gas prices increasing, asset-based margins increase; when LMPs decrease due to natural gas prices decreasing, asset-based margins decrease. For Xcel's existing generation assets, the increase in the sales price per MWh outweighs the increase in unit cost per MWh. (However, as noted above, on an overall basis the increase in asset-based margins when natural gas prices increase is counteracted by higher costs for owned and purchased natural gas generation. Xcel is thus hedged to some degree against fluctuations in natural gas prices.)

Regarding 2022 versus 2024 specifically, Xcel stated the primary reason for lower asset-based margins was lower natural gas prices and thus lower LMPs. Xcel is forecasting 2024 average LMPs to be 34% lower than 2022 average LMPs.[7] The 34% lower LMPs are the primary reason forecasted 2024 asset-based sales are, according to Xcel, **[TRADE SECRET DATA EXCISED]** than actual 2022 asset-based sales revenues. Asset-based costs are lower as well, but the decrease in revenue far outweighs the decrease in costs, resulting in 2024 forecasted asset-based margins being about **[TRADE SECRET DATA EXCISED]** than 2022 actuals.

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[4] Xcel reply comments, Attachment E
[5] Department initial comments, page 23 and Xcel reply comments, page 5.
[6] Xcel reply comments, page 10.
[7] $30.02 in 2024 (Reply Comments, Attachment E) versus $45.24 in 2022 (Reply Comments, page 4).

Xcel also pointed to the substantial decline in coal generation from 2022 to the forecast for 2024, with the primary driver being the retirement of Sherco 2 at the end of 2023.[8] Xcel stated that its coal resources "are some of the lowest cost resources on the Company's system and less asset-based sales from them has a compounding effect on asset-based sales margins."

The Department appreciates the additional information provided by Xcel. The Department is satisfied with Xcel's explanation for the forecasted decrease in asset-based margins and recommends the Commission accept Xcel's asset-based margin forecast, as updated in Xcel's reply comments, subject to true-up.

B. SALES FORECAST

The Department's initial comments reviewed Xcel's 2024 sales forecast information provided in Parts B, F, and G of the initial petition.[9] The Department concluded Xcel's 2024 sales forecast appeared reasonable, given Xcel was using the same methods as in prior proceedings and the forecast was within the range of prior years. As a result, the Department recommended the Commission accept Xcel's 2024 forecasted sales in this proceeding to set FCA rates for 2024 and notes Xcel's FCA revenues and costs are subject to true-up in the 2024 true-up petition to be filed in 2025.[10]

However, the Department noted that despite forecasted 2024 system generation being higher than historical averages, 2024 forecasted sales were lower than average. The Department requested that Xcel explain this divergence in reply comments.

Xcel's reply comments stated that the decrease in forecasted 2024 net system sales, relative to 2020-2022 on average and 2023's forecast, was primarily due to the implementation of the long-term Renewable*Connect program scheduled to launch in late 2023, which is projected to decrease net system sales by an additional 1.6% relative to 2020-2022 gross system sales. (Net system sales are overall NSP system sales minus Renewable*Connect sales.)

Xcel also provided information showing that forecasted overall system sales before subtracting Renewable*Connect is only forecasted to be down 0.7% from 2024 relative to 2020-2022 on average.[11] Xcel stated this remaining component of the decrease in forecasted net sales is due to new demand-side management measures and increased penetration of distributed solar generation.

The Department appreciates Xcel's clarification on this issue and is satisfied with Xcel's explanation.

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[8] Department's initial comments, page 15, which show a **[TRADE SECRET DATA EXCISED]** decrease in coal generation (GWh) forecasted for 2024 relative to 2022 actuals.
[9] As noted above, Xcel's reply comments did not update the Xcel's 2024 sales forecast.
[10] The Department also noted that its recommendations in this docket should not be used in Xcel's future rate cases or other rate proceedings, where a more thorough review of the sales forecast will occur.
[11] Table 1 in Xcel's reply comments, Calendar Month MWh Sales in 2024 relative to 2020-2022 average.

C. UNPLANNED OUTAGE RATES

The Department's initial comments concluded that, except for the forecasted unplanned outage rates for King and Sherco 1 and 3, Xcel had reasonably explained its forecasted 2024 outage costs. Assuming Xcel provided a reasonable explanation of this issue, the Department recommended the Commission accept Xcel's forecasted 2024 outage costs for purposes of establishing FCA rates in this proceeding, subject to true-up.

As noted in the Department's initial comments, Part B, Attachment 6 (page 1) of the initial petition provided forecasted unplanned outage rates for base-load units (natural gas combined cycle, coal, and nuclear). For these units, Xcel forecasted 2024 unplanned outage rates based on a five-year average. However, for King and Sherco 1 and 3,[12] Xcel **[TRADE SECRET DATA EXCISED]** as shown in Part B, Attachment 6 and Part G, Workpaper 9, and reproduced below with the scheduled retirement dates added.

Department Table 3:
Unplanned Outage Rates (Initial Forecast): Sherco 1, King, and Sherco 3

Unit	Retirement[13]	5-Year Average (2017-2021)	Adder	2024 Forecast
		[TRADE SECRET DATA EXCISED		
Sherco 1	2026			
King	2028			
Sherco 3	2030			
				TRADE SECRET DATA EXCISED]

The initial petition stated unplanned outages for coal plants are forecasted based on "expected conditions of the units going forward, including managed decline as plants near retirement." Given the lack of specificity in this description, the Department requested Xcel explain and justify this method in reply comments.

Xcel's reply comments state the forecasted increase in unplanned outages over the five-year average is due to Xcel reducing capital and O&M spend at the plants. Xcel states the reduction in upkeep and investment is because of the planned upcoming retirement dates, which as noted above range from 2026 to 2030. As shown in the table above, the closer to retirement, **[TRADE SECRET DATA EXCISED]**.

Pointing to historical examples, Xcel cited Sherco 2 (retiring in 2023), where "the outage scope was reduced to required inspections and minimal preventative maintenance." As a result, for Sherco 2 "there are risks of increased boiler tube leaks or equipment failures causing derates or a forced outage, reducing energy availability …"

[12] As stated on page 7 of the petition, Sherco Unit 2 is planned to retire in 2023.
[13] April 25, 2022 Order in Docket No. E002/RP-19-368, page 6 and Order Point 4.

Xcel indicated it is balancing these concerns similarly for the upcoming retirement of its other coal units, stating that its "goal is to balance reliability and prudent spend on a retiring asset" and that "[i]t would be imprudent for the Company to expend large sums of money on capital investment in plants that are nearing retirement."

While the Department understands Xcel's concerns about unduly maintaining and investing in plants that will be retired over the next 3 to 7 years, and agrees in principle about the need to balance reliability and maintenance spend, the Department notes that cost is also an important part of the equation. The Department understands that unplanned outages would naturally increase for plants nearing retirement and therefore, as a general matter, assuming forecasted unplanned outage rates will be higher than average is reasonable. However, Xcel still has a responsibility to reasonably manage overall costs. Further, the Department notes that the Commission has stated that "utilities have a duty to minimize unplanned facility outages through adequate maintenance and to minimize the costs of scheduled outages through careful planning, prudent timing, and efficient completion of scheduled work."[14] Generally, the Department expects Xcel to balance plant maintenance not only with reliability concerns, but also with the goal of minimizing overall FCA costs, including lost revenues and repair costs incurred when plants are forced to deal with unplanned outages.

The Department also notes that Xcel may have a reduced incentive to minimize unplanned outages. This is because (1) generation maintenance expense is recovered at a fixed level through base rates, which gives utilities an incentive to minimize generation maintenance expense between rate cases; (2) the amount of generation maintenance expense is linked to a utility's unplanned outages; and (3) utilities do not have a strong incentive to minimize the replacement power costs for which they receive flow through recovery through the FCA. As a result, the Department monitors the difference between investor-owned utilities' actual and approved generation maintenance expenses in FCA true-up filings.

The Department notes that Xcel is now forecasting significantly lower unplanned outage rates for Sherco 1, King, and Sherco 3, as shown in Attachment G to Xcel's reply comments. While this update is slightly encouraging, the Department remains concerned about Xcel's prudent management of these plants as they near retirement.

Therefore, the Department recommends that Commission require Xcel to specifically report on the prudency of its management of unplanned outages at these plants when Xcel files its next FCA true-up report.

D. OTHER POWER PURCHASE AGREEMENTS (PPAs)

The Department's initial comments noted that 2024 forecasted energy purchased from "Other" (small hydro PPAs, the remaining biomass PPA, and the PPA with Manitoba Hydro) PPAs was [**TRADE SECRET DATA EXCISED]** than 2020-2022 averages, while being **[TRADE SECRET DATA EXCISED]** to 2023's forecast. The Department requested that Xcel explain why in reply comments.

[14] February 6, 2008 Order in Docket No. E999/AA-06-1208, page 5.

Xcel's reply comments stated that a new contract with Manitoba Hydro began in 2021, resulting in increases in Other PPA generation from part-way through 2021 onwards. The Department appreciates Xcel's explanation.

E. OWNED WIND PRODUCTION

1. Overall

As shown in the Department's initial comments (page 26), Xcel's actual wind generation for Xcel-owned facilities has been consistently lower than Xcel assumed when the projects were approved, and Xcel forecasts this trend to continue in 2023 and 2024. The Department requested that Xcel, in reply comments, provide a discussion and explanation of this phenomenon.

Xcel's responded by stating that its modelling assumptions are intended to result in an estimated capacity factor at the middle of the distribution of potential capacity factors and that actual capacity factors will vary. Xcel also pointed to the increase in wind curtailment across the MISO footprint and as a result higher curtailment than modeled at the time of acquisition. Finally, Xcel stated that lower capacity factor sensitivities are typically evaluated as part of the analysis at the time of acquisition to assess the risk that actual capacity factors may be lower than assumed.

While the Department appreciates Xcel's response and the potential effect of curtailment on actual versus assumed capacity factors, the Department remains concerned. As stated in the Department's initial comments, the Department intends to continue monitoring actual wind production levels. If lower-than-assumed production continues to be an ongoing problem, the Department will further investigate and make warranted recommendations, given that the Commission has stated in numerous wind acquisition approvals that it will hold Xcel accountable for assumed benefits that do not materialize.

To assist with this monitoring, the Department believes additional reporting is warranted. Specifically, the Department recommends the Commission require Xcel to report the following starting with its next FCA true-up report (to be filed in 2024): Xcel shall provide two tables, in the format of Table 8 in the Department's June 29, 2023 comments in the instant docket, showing, for each Xcel-owned wind facility, the assumed versus actual wind capacity factors for the true-up year and the three prior years. The first table must show capacity factors after curtailment and the second table must show capacity factors if no curtailment had occurred.

2. Curtailment

The Department's initial comments noted the significant increases in forecasted 2024 curtailment MWh for some Company-owned wind farms compared to 2020-2022 actuals. For example, as shown in the Department's initial comments (page 29, Table 10), Xcel's forecasted 2024 wind curtailments for its Blazing Star 1 wind farm has increased from actuals of 9,283 MWh in 2021 and 6,809 MWh in 2022 to a forecasted amount of **[TRADE SECRET DATA EXCISED]** in 2024. The Department's initial comments noted similar changes for Blazing Star 2, Borders, Courtenay, and Pleasant Valley wind farms. The Department requested Xcel's reply comments explain these large variations in forecasted 2024 curtailments over 2021 and 2022 actuals.

Xcel's responded as follows:

> As noted by the Department on page 29, curtailment at owned wind projects has been increasing since 2020. Department Table 10 lists ten projects that went in-service in 2020 or later, which is the main driver to increasing curtailment for owned wind projects over this period. In addition, two projects have been repowered, further contributing to greater wind generation and, as a result, greater curtailment. The increase in curtailment for specific projects noted by the Department is a result of the curtailment modeling technique used in the PLEXOS simulation. All owned wind projects are treated nearly equally in the simulation from a cost offer standpoint and the simulation curtails only enough wind to balance supply and demand without regard to which projects are being curtailed. Therefore some projects are curtailed at a higher level, while some show zero curtailments, as shown in Department Table 10. Our expectation is that some curtailment will occur at all Company-owned projects throughout the course of a year; however, this is not something that can be achieved using the curtailment model that is in the PLEXOS simulation. From 2020 to 2022 there is considerable variation from year to year in the curtailment for each owned wind project listed in Department Table 10. This is something that would be nearly impossible to replicate with any degree of accuracy in a forecast model. Furthermore, from a production cost standpoint, project by project variation will not impact total production costs since the owned wind projects are all modeled at zero cost.
>
> Wind curtailment MWh for Company-owned wind facilities has been on average increasing over the years, largely due to the addition of new wind facilities coupled with ongoing congestion. Congestion costs, which have been high since 2021, are primarily driven by large additions of renewable energy in the MISO footprint without sufficient addition of transmission to deliver energy from generators to load centers within the MISO footprint. The Company monitors congestion costs regularly, and if future actual costs show another step change or significant trend, we plan to update accordingly in our next update.

The Department appreciates Xcel's explanation and is satisfied with the Company's response. The Department now recommends the Commission accept Xcel's forecasted 2024 wind curtailments for company-owned facilities, subject to true-up.

F. JURISDICTIONAL ALLOCATION

As described in Part B, Attachment 13 of the initial petition, Xcel's Minnesota jurisdiction is one of five jurisdictions forming part of the overall NSP system, which operates as an integrated whole for power operation purposes. As such, the total FCA costs of the NSP system (excluding any costs only assigned to Minnesota, as discussed in the Department's initial comments) must be fairly allocated across jurisdictions. In 2024, Xcel is forecasting total NSP system FCA costs of **[TRADE SECRET DATA EXCISED]**.[15]

The NSP system is composed of two companies: Northern States Power Minnesota (NSPM) and Northern States Power Wisconsin (NSPW). NSPM serves the Minnesota, North Dakota, and South Dakota jurisdictions. NSPW serves the Wisconsin and Michigan jurisdictions.

Xcel previously allocated costs to the Minnesota jurisdiction solely using a MWh sales allocator. Using this allocator results in Minnesota customers paying 70.3% of forecasted 2024 NSP system FCA costs.

Xcel is now proposing to adjust its method by first allocating costs between NSPM and NSPW using the FERC Interchange Agreement energy allocator.[16] Xcel would then allocate costs among the three NSPM jurisdictions according to their MWh sales. Using Xcel's' this new two-part allocator results in Minnesota customers paying 70.8% of forecasted 2024 NSP system costs.[17]

The Department's initial comments concluded that Xcel's proposal appeared reasonable in theory for the purpose of the FCA. However, to make a full assessment of the reasonableness of the proposal, the Department requested Xcel calculate the results using the existing versus proposed method and provide a comparison to other jurisdictional allocators used elsewhere for Xcel and across the NSP system.

Table 4 and Attachment H of Xcel's reply comments provided the requested calculations comparing the two methods, which results in the 70.8% versus 70.3% results cited above. In addition, Xcel stated that variable expenses are allocated across jurisdictions using energy consumption and provided several examples.

While Xcel's proposal does result in slightly more FCA costs being allocated for the Minnesota jurisdiction relative to the existing method, the Department concludes Xcel's new two-step method is reasonable. The proposal accurately reflects cost allocation between NSPM and NSPW as reflected in the FERC Interchange Agreement and therefore better supports accurate cost recovery versus the prior pure-sales method. Further, in dividing costs within NSPM, the proposal does not unfairly burden Minnesota relative to the two other NSPM jurisdictions. Minnesota, North Dakota, and South Dakota customers are all equally affected, which each receiving about a 0.8% increase in allocated costs for 2024's forecast. Comparing hypothetical allocations in prior years, the increase is smaller, ranging from about 0.3% to 0.7%, with the percentage increases again being roughly the same for each NSPM jurisdiction.[18] For these reasons, the Department recommends the Commission approve Xcel's proposed jurisdictional allocator update.

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[15] Xcel reply comments, Table 4 and Attachment H.
[16] As described in the initial petition, the Interchange Agreement is a formula rate which assigns charges between the two operating companies for costs related to the integrated electric system, including FCA costs.
[17] Calculated from Xcel reply comments, Table 4 and Attachment H.
[18] *Id.*

IV. REVIEW OF FORECAST UPDATES

As noted earlier in these response comments and summarized on page 10-11 of Xcel's reply comments, Xcel proposed five input updates in its reply comments, relative to the forecast filed in Xcel's initial petition. The Department reviews these proposed updates below.

A. COAL PRICES, NATURAL GAS PRICES, AND MISO PRICES

The first three input updates are a slight increase in coal prices (see Attachment D) and a slight decrease in natural gas prices and as a result a decrease in LMPs (see Attachment E). The Department concludes these updates are reasonable given they reflect updated commodity price information.

B. MISO CHARGES

The fourth update is a decrease in MISO charges including net congestion costs (Attachment F). Xcel explained the rationale for this update in Attachment F to its reply comments as follows:

[TRADE SECRET DATA EXCISED]

The Department concludes Xcel's update to reduce forecasted MISO charges is reasonable considering the developments year-to-date cited by Xcel's reply comments.

C. OUTAGES

Xcel's reply comments update forecasted 2024 outages to reflect updates to Xcel's maintenance plans. As a result, Xcel's forecasted outage MWh and replacement power costs have changed as shown in Attachment G, which corresponds to Part B, Attachment 7 of the initial petition. The Department summarizes Xcel's updated outage costs in the table below, which is an updated version of the table on page 25 of the Department's initial comments.

Department Table 4:
Forecasted vs. Actual Outages – Costs and Lost Energy

	Planned Outages			Unplanned Outages			Total Outages		
	Costs (000s)	GWh	$/MWh	Costs (000s)	GWh	$/MWh	Costs (000s)	GWh	$/MWh
	[TRADE SECRET DATA EXCISED								
2024 Updated Forecast									
2024 Initial Forecast									
2023 Forecast									
									TRADE SECRET DATA EXCISED]
2020-22 Avg Actuals	$ 23,657	2,034	$11.63	$ 23,474	1,285	$18.27	$ 47,131	3,319	$14.20
2022 Actuals	$ 33,726	1,604	$21.03	$ 48,877	1,880	$26.00	$ 82,603	3,484	$23.71
2021 Actuals	$ 36,673	3,130	$11.72	$ 10,197	763	$13.36	$ 46,870	3,893	$12.04
2020 Actuals	$ 571	1,368	$0.42	$ 11,348	1,212	$9.36	$ 11,919	2,580	$4.62

Sources:
2024 Updated Forecast: Reply Comments, Attachment G
2024 Initial Forecast: Petition, Part B, Attachment 7
2023 Forecast: Xcel's July 29, 2022 Reply Comments in Docket No. E002/AA-22-179, Attachment I
2020-22 Actuals: Xcel's response to Department IR 6, Attachment A

As shown in the table above, relative to its initial forecast, Xcel is now forecasting **[TRADE SECRET DATA EXCISED]**.

For planned outages, Xcel's update reflects updates to its maintenance schedule. The main change is **[TRADE SECRET DATA EXCISED]**. As a result, Xcel now expects to lose **[TRADE SECRET DATA EXCISED]**.

For unplanned outages, most units are forecasted to have **[TRADE SECRET DATA EXCISED]** relative to Xcel's initial forecast. The biggest changes come from **[TRADE SECRET DATA EXCISED]**, as discussed in further detail above in the Department's response to Xcel regarding unplanned outage rates.

The Department concludes that Xcel has provided sufficient information about its updated outage forecast and recommends approval.

V. RECOMMENDATIONS

The Department provides the following recommendations, which are the same recommendations from the Department's initial comments, updated to incorporate information provided by Xcel in reply comments.

<u>Compliance Items:</u>
The Department recommends the Commission accept Xcel's compliance with reporting requirements for the instant petition relating to its 2024 FCA forecast.

<u>Sales Forecast:</u>
The Department recommends the Commission accept Xcel's 2024 forecasted sales in this proceeding, subject to subsequent true-up.

<u>Company Owned Generation:</u>
Based on our review and the explanations Xcel provided, the Department concludes Xcel's forecasted 2024 fuel costs for Company-owned generating units appears reasonable. As a result, the Department recommends the Commission accept Xcel's forecasted 2024 fuel costs for company-owned generation for the purpose of setting initial 2024 FCA rates in this proceeding, subject to subsequent true-up.

<u>Long-Term PPAs:</u>
Based on our review and the explanations Xcel provided, the Department concludes the Company's forecasted 2024 long-term purchased energy costs appear reasonable. As a result, the Department recommends the Commission accept Xcel's forecasted 2024 long-term purchased energy costs for the purpose of setting initial 2024 FCA rates in this proceeding, subject to subsequent true-up.

<u>MISO Energy Market (MISO Day 2) and Ancillary Services Market (ASM or MISO Day 3):</u>
Based on our review and the explanations Xcel provided, the Department concludes the Company's forecasted 2024 MISO Day 2 and Day 3 charges appear reasonable. As a result, the Department recommends the Commission accept Xcel's forecasted 2024 MISO Day 2 and Day 3 charges for the purpose of setting initial 2024 FCA rates in this proceeding, subject to subsequent true-up.

Asset-Based Margins:
The Department recommends the Commission accept Xcel's asset-based margin forecast, as updated in Xcel's reply comments, subject to true-up.

Outage Costs:
The Department concludes Xcel has reasonably explained its forecasted 2024 outage costs. The Department recommends the Commission accept Xcel's forecasted 2024 outage costs for purposes of establishing FCA rates in this proceeding, subject to true-up. However, the Department also recommends the Commission require Xcel to report on the prudency of its management of unplanned outages at Sherco 1, King, and Sherco 3 in Xcel's next FCA true-up petition, where actual outage costs will be subject to a prudency review and may be disallowed if Xcel has not sufficiently justified the reasonableness of its maintenance efforts.

Wind Production:
The Department intends to continue monitoring actual production levels and, to the extent lower-than-assumed production continues to be an ongoing problem, will further investigate and make warranted recommendations, given that the Commission has stated in numerous wind acquisition approvals that it will hold Xcel accountable for assumed benefits that do not materialize. To assist with this monitoring, the Department believes additional reporting is warranted. Specifically, the Department recommends the Commission require Xcel to report the following starting with its next FCA true-up report (to be filed in 2024): Xcel shall provide two tables, in the format of Table 8 in the Department's June 29, 2023 comments in the instant docket, showing, for Xcel-owned wind facility, the assumed versus actual wind capacity factors for the true-up year and the three prior years. The first table must show capacity factors after curtailment and the second table must show capacity factors if no curtailment had occurred.

Regarding curtailment, the Department concludes Xcel's forecasted 2024 wind curtailment costs for PPAs and Company-owned wind appear reasonable. As a result, the Department recommends the Commission accept Xcel's forecasted 2024 wind curtailment costs for PPAs and Company-owned wind in this proceeding to set FCA rates for 2024, subject to true-up.

Minnesota-Only FCA Costs (Community Solar Gardens – Above Market Costs and Biomass Buyout Costs):
The Department concludes that Xcel's forecasted 2024 CSG – AMC appears to be reasonable and recommends the Commission accept them for the purpose of setting initial 2024 FCA rates in this proceeding, subject to subsequent true-up.

The Department also concludes Xcel's forecasted 2024 biomass buyout costs appear reasonable and recommends the Commission accept Xcel's forecasted 2024 biomass buyout costs for the purpose of setting initial 2024 FCA rates in this proceeding, subject to subsequent true-up.

Jurisdictional Allocation:

The Department concludes Xcel's updated jurisdictional allocation method is reasonable and recommends approval.

Forecast Updates

The Department concludes Xcel's forecast updates as provided in its reply comments are reasonable and recommends approval.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Public Response Comments

Docket No. E002/AA-23-153

Dated this **24th** day of **August 2023**

/s/Sharon Ferguson

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