



414 Nicollet Mall
Minneapolis, Minnesota 55401

**PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED**

— VIA ELECTRONIC FILING —

January 10, 2022

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
PETITION FOR APPROVAL OF A CREDIT MECHANISM TO RETURN TO
CUSTOMERS DEPARTMENT OF ENERGY SETTLEMENT PAYMENTS.
DOCKET NO. E002/M-21-815

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments. We appreciate the review of our filing by the Minnesota Department of Commerce, Division of Energy Resources (Department), and for their recommendations in their December 23, 2021 comments.

The Department requested the Company provide additional information regarding: (1) support for the planned implementation timing for the customer bill credit, and (2) the Settlement Agreement and third extension of the Settlement Agreement with the Department of Energy.

Credit Implementation Timing

The Company's billing system is capable of processing only one refund at a time.¹ As a result, the 12th Minnesota DOE credit needs to be coordinated with other refunds and billing credits already scheduled to occur in 2022 in various NSP state jurisdictions. The DOE credit involves calculating an individual credit amount for every Minnesota customer based on twelve months of usage; the total setup, testing and posting to accounts involves approximately eight weeks. Therefore, we proposed combining the DOE credit with the already scheduled 2020 property tax

¹ The billing system limitation applies to refunds/credits based on 12 months of historical usage.

and annual incentive program (AIP) refund in our August 10, 2021 Reply Comments in Docket No. E002/M-19-688.

The Company may not be able to begin implementing the 12th DOE credit within 60 days of an Order. We are currently preparing the South Dakota DOE credit for implementation. If we are able to process the Minnesota 12th DOE credit after we issue the South Dakota credit, we will do so. However, we have a standing requirement to provide a refund to Windsource customers before their transition to the Renewable*Connect program.² To meet that requirement, we need to begin the transition work in mid-March of 2022. If we cannot complete the Minnesota 12th DOE credit before mid-March of 2022, we will process the Windsource refund and then begin implementation of the combined 2020 property tax and AIP refund along with the DOE 12th credit.

Department of Energy Settlement Negotiations

The Department requested information as to whether the third extension of the Settlement Agreement is similar to the original Settlement Agreement or if there have been any changes. The original Settlement Agreement and the extension documents are materially and substantively the same in terms of the process for claims submission and the standards for determining the Company's allowable costs. The third extension of the Settlement Agreement does include one minor technical change to the acceptance rate table attached to the original Settlement Agreement; this change was included in the third extension by agreement of the parties to clarify a minor error in that table and is not of substantive import. The Company and the U.S. Government reached the third extension of the Settlement Agreement in August of 2020. The third extension of the Settlement Agreement extends the 2011 Settlement Agreement for the recovery of spent fuel storage damages for another three-year period to allow for recovery of damages through December 31, 2022 (Payments 12, 13, 14).

Attachment A is a copy of the original Settlement Agreement and Attachment B contains a copy of the third extension of the Settlement Agreement. Both Attachments are trade secret in their entirety.

Future Compliance

The Company agrees with the Department's recommendations to submit a compliance filing 30 days after completion of the bill credits and to continue providing the information and documentation consistent with the Commission's Order in Docket No. E002/M-11-807.³

²See Docket Nos. E-002/M-01-1479, E-002/M-19-33 Order (July 2, 2020) pt. 1b. This Windsource refund was scheduled for January 2022 and was delayed due to delays in the availability of the solar and wind resources required to support the program.

³ Order Point 11, December 16, 2011 Order, Docket No. E002/M-11-807.

Please note Attachments A and B include Trade Secret information protected by the Minnesota Data Practices Act. Xcel Energy maintains this information as trade secret pursuant to Minn. Stat. §13.37 (1)(b) based on its economic value from not being generally known and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use. This information includes confidential contractual terms. This information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

Pursuant to Minn. Stat. § 216B.17, Xcel Energy has electronically filed these documents with the Minnesota Public Utilities Commission. If you have any questions or concerns regarding this matter, please contact Gail Baranko at (612) 330-6935 or gail.baranko@xcelenergy.com or Carl Cronin at (612) 215-4669 or carl.cronin@xcelenergy.com.

Sincerely,

/s/

GAIL A. BARANKO
MANAGER, REGULATORY PROJECTS

Enclosures
cc: Service Lists

**PUBLIC DOCUMENT –
NON-PUBLIC DATA HAS BEEN EXCISED**

Northern States Power Company

Docket No. E002/M-21-815

Reply Comments – Attachments A & B

Page 1 of 1

Attachments A and B are marked as “Non-Public” in their entirety. Pursuant to Minn. R. 7829.0500, subp. 3, the Company provides the following description of the excised material:

Attachments A and B:

1. **Nature of the Material:** PDF copy of Original Settlement Agreement and Third Extension of the Settlement Agreement with the Department of Energy
2. **Authors:** The Company and Department of Energy
3. **Importance:** Protected material subject to U.S. Court of Federal Claims Protective Order
4. **Date the Information was Prepared:** January 6, 2022

CERTIFICATE OF SERVICE

I, Mustafa Adams, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

XCEL ENERGY SERVICE LIST E002/M-21-815

Dated this 10th day of January 2022

/s/

Mustafa Adams
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sigurd W.	Anderson	mariner@eldinc.com	Engineering Lab Design	30910 716th St Lake City, MN 55041	Electronic Service	No	OFF_SL_21-815_M-21-815
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_21-815_M-21-815
Mara	Ascheman	mara.k.ascheman@xcelen ergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-815_M-21-815
Gail	Baranko	gail.baranko@xcenergy.c om	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-815_M-21-815
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_21-815_M-21-815
James J.	Bertrand	james.bertrand@stinson.co m	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
James	Canaday	james.canaday@ag.state. mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-815_M-21-815
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_21-815_M-21-815
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-815_M-21-815

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-815_M-21-815
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_21-815_M-21-815
James	Denniston	james.r.denniston@xcenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 401-8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-815_M-21-815
Kristen	Eide Tollefson	healingsystems69@gmail.com	R-CURE	28477 N Lake Ave Frontenac, MN 55026-1044	Electronic Service	No	OFF_SL_21-815_M-21-815
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-815_M-21-815
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	2720 E. 22nd St Institute for Local Self-Reliance Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-815_M-21-815
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-815_M-21-815
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-815_M-21-815

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_21-815_M-21-815
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-815_M-21-815
Thomas P.	Harlan	harlan@mdh-law.com	Madigan, Dahl & Harlan, P.A.	222 South Ninth Street Suite 3150 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
Matthew B	Harris	matt.b.harris@xcelenergy.com	XCEL ENERGY	401 Nicollet Mall FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-815_M-21-815
Shubha	Harris	Shubha.M.Harris@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 401 - FL 8 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-815_M-21-815
Amber	Hedlund	amber.r.hedlund@xcelenergy.com	Northern States Power Company dba Xcel Energy- Elec	414 Nicollet Mall, 401-7 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-815_M-21-815
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-815_M-21-815
Michael	Hoppe	lu23@ibew23.org	Local Union 23, I.B.E.W.	445 Etna Street Ste. 61 St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-815_M-21-815
Geoffrey	Inge	ginge@regintl.com	Regulatory Intelligence LLC	PO Box 270636 Superior, CO 80027-9998	Electronic Service	No	OFF_SL_21-815_M-21-815
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_21-815_M-21-815

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_21-815_M-21-815
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
Elise	Larson	elarson@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West, Suite 515 St. Paul, MN 55104	Electronic Service	No	OFF_SL_21-815_M-21-815
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_21-815_M-21-815
Ryan	Long	ryan.j.long@xcelenergy.com	Xcel Energy	414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-815_M-21-815
Philip	Mahowald	pmahowald@thejacobsonlawgroup.com	Jacobson Law Group	180 East Fifth Street Suite 940 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-815_M-21-815

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-815_M-21-815
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_21-815_M-21-815
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-815_M-21-815
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_21-815_M-21-815
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_21-815_M-21-815
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_21-815_M-21-815
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_21-815_M-21-815

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_21-815_M-21-815
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-815_M-21-815
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_21-815_M-21-815
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-815_M-21-815
Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-815_M-21-815
Jessie	Seim	jessie.seim@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd Welch, MN 55089	Electronic Service	No	OFF_SL_21-815_M-21-815
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-815_M-21-815
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_21-815_M-21-815

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-815_M-21-815
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No	OFF_SL_21-815_M-21-815
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_21-815_M-21-815
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-815_M-21-815
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_21-815_M-21-815
Thomas	Tynes	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_21-815_M-21-815
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-815_M-21-815

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_21-815_M-21-815
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-815_M-21-815