

October 27, 2014

Burl W. Haar
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-14-814

Dear Dr. Haar:

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 for New 2015 Rate Rider Factor.

The petitioner is:

Paul J. Lehman
Manager, Regulatory Compliance and Filings
Northern States Power Company d/b/a Xcel Energy
414 Nicollet Mall
Minneapolis, Minnesota 55401-1993

The Department recommends **approval** of a reduction in Xcel's proposed 2015 RDF rate rider factor from \$0.000589 per kWh to \$0.000563 per kWh to take into account the Commission-required refund of grant payments made to AnAerobics. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ SAMIR OUANES
Rates Analyst

SO/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. E002/M-14-814

I. SUMMARY

On September 26, 2014, 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 2015 Renewable Development Fund (RDF) rate rider factor. 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. In 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

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.

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.

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 new 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 are all construction related and cannot 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.

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

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.

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 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 AnAerobics RDF project equipment 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 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 will be subtracted from the expenses Xcel will recover from its Minnesota ratepayers in setting the 2015 RDF rates.

As noted above, on September 26, 2014, Xcel filed a Petition requesting that the Commission approve the 2015 RDF rate rider factor and accept the RDF Annual Report and Tracker Account True-Up.

III. DEPARTMENT ANALYSIS

Currently, Xcel's RDF rate rider adjustment factor (RDF factor) is set at \$0.000750 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. In the instant filing, the Company is requesting to decrease the level of the RDF factor to \$0.000589 per kWh. For an average residential customer, the proposed RDF factor would result in a charge of about \$0.44 per month.⁴

The Department's analysis below is based on a review of Xcel's tracker report activity in 2013, 2014 and 2015, and the most recent information provided by the Company regarding the progress made by the Commission-approved RDF projects.⁵

To facilitate the review of the Company's tracker report activity, the Department maintains a separate RDF tracker model which is updated each year with the new input data provided by the Company in its annual RDF filings.

The updated input data supporting Xcel's calculation of its proposed RDF factor covers the period of January 2013-August 2014 (actual data) and the period of September 2014-December 2015 (forecasted data). In response to discovery from the Department, the Company provided the electronic copy of the spreadsheets, including the input data, supporting Xcel's calculation of its proposed RDF factor.⁶

The Department updated its RDF tracker model as discussed above to develop the following spreadsheets, which are attached to these comments:

- A summary of Xcel's actual 2013 RDF Budget, Attachment 1;
- A summary of Xcel's forecasted 2014 Budget, Attachment 2;
- A summary of Xcel's forecasted 2015 Budget, Attachment 3;
- A summary of the status of the RDF Cycle 1 projects and funding received, Attachment 4;
- A summary of the status of the RDF Cycle 2 projects and funding received, Attachment 5;
- A summary of the status of the RDF Cycle 3 projects and funding received, Attachment 6;
- RDF annual administrative costs and RDF annual grant expenditures since 2004, Attachment 7; and
- RDF grant payments, administrative costs, other Legislative mandates expenditures, grants awarded, and unencumbered cumulative balance as of December 31, 2013, Attachment 8.

⁴ Based on an average monthly consumption of 750 kWh.

⁵ Xcel's October 22, 2014 RDF Quarterly Status and Progress Report in Docket Nos. E002/M-00-1583, E002/M-03-1883, E002/M-07-675 and E002/M-12-1278.

⁶ See Xcel's response to the Department's Information Request No.1, Attachment 9.

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, and about the level of the surplus in the RDF tracker.⁷

The monthly cumulative balance of the RDF tracker has been negative (surplus) over the years, 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.

Surplus balances mean that the Company is charging its customers rates that are too high. To alleviate 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 amounts, using the criteria for "known and measurable" agreed to by Xcel and the OES [Department].

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 RDF costs in 2014 and 2015: Renewable Energy Production Incentive (REPI) payments, the Minnesota Bonus Solar Rebate Program (Solar Rebate), the "Made in Minnesota" Solar Energy Production Incentive Account (Solar Incentive) and the Solar Energy Incentive Program (Solar Rewards Program).

Further information regarding these items is provided in the Petition. These payments are prescribed by the Minnesota Legislature in Minnesota Statutes Sections 116C.779, 116C.7791, 216C.412 and 116C.7792. Because 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 2014 and 2015.

Table 1 below shows the actual and forecasted RDF payments for the legislatively mandated programs.⁸

⁷ Docket No. E002/M-09-1145.

⁸ See Xcel's response to the Department's information request Nos. 2-5, Attachment 10.

Table 1: Actual and Forecasted RDF Payments Associated with Legislatively Mandated Programs

	REPI	Solar Rebate	Solar Incentive	Solar Rewards
2013	\$7,412,901	\$2,119,059		
2014	\$5,508,030	\$3,531,804	\$12,021,295	\$49,550
2015	\$1,610,736	\$4,200,000	\$12,021,295	\$242,864

The Company stated that the forecasted amount for the Solar Rebate includes solar photovoltaic (PV) installations that have been completed and energized or have received a pre-approval acknowledgement letter. The Department agrees that this approach is a reasonable application of the agreed-upon “known and measurable criteria.”

Grant Project Payments. The Company also proposed to not include RDF grant project payments as known and measurable RDF costs for the forecast period of September 2014 through December 2015. In response to the Commission’s June 2010 Order, 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.

The specific criteria are as follows:

Energy Production (EP) Projects: All of the following criteria must be met for costs to be included as known and measurable costs:

1. An executed RDF grant contract has been reviewed by the Department and approved by the Commission;
2. An executed power purchase agreement (PPA) has been reviewed by the Department and approved by the Commission;
3. Any necessary co-financing for the project has been secured;
4. Any necessary site lease has been secured; and
5. 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.

Research & Development (R&D) Projects: All of the following criteria must be met for costs to be included as known and measurable costs:

1. An executed RDF grant contract has been reviewed by Department and approved by the Commission;
2. At least twelve months of project activity has been completed;
3. 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;
4. The project is currently within budget (plus or minus 10 percent);
5. No outstanding technical issues need to be resolved in order to proceed with the project in a timely manner; and

6. Project management stability has been demonstrated, *i.e.*, no unexpected turnover.

In its November 1, 2010 comments, the Department agreed with the criteria as stated above since they provide for a reasonable checklist of potential areas where a project may have trouble proceeding and, 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. As a result, this approach should reduce the amount of the RDF tracker balance surplus compared to what it has been in the last few years.⁹

The application of these criteria appears to be working. For the first time since July 2006, with the exception of May 2009, the actual cumulative monthly RDF balance did not result in a substantial surplus.¹⁰

Administrative Expenses. The Company also proposed to include RDF base-level administrative expenses of \$90,749 as known and measurable RDF administrative costs in 2015. These base-level administrative expenses cover an RDF grant administrator, RDF advisory group miscellaneous meeting expenses and Clean Energy States Alliance membership dues. Xcel indicated that it believes additional administrative resources will be needed as the 4th cycle grant contracts are executed and project activity is initiated.

The Department does not object to including base-level administrative expenses as known and measurable expenses, and discusses in Section B below the cap on administrative costs set by the Commission.

B. ADMINISTRATIVE COST CAP

Background: 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.

The five percent 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.

⁹ Source: Department's November 1, 2010 comments in Docket No. E002/M-10-1054.

¹⁰ Instead, the RDF tracker has experienced a cumulative balance deficit for each of the months of March 2012 through August 2014, with the exception of February and March 2013. Source: Attachments 1 and 2 to these comments (page 2 of 2).

Administrative Cost Cap: The Commission-approved proposal regarding the calculation of the five percent cap is as follows:¹¹

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.

The first computation (Actual & Forecasted) is used as an indicator regarding whether the administrative cap percentage is expected to increase or decrease going forward. The second computation (Actual Only) verifies whether the administrative cap percentage is equal to, or less than, the five percent administrative cap established by the Commission over the life of the program.

The Department's administrative cost computations (3.7 percent for "Actual Only" up to 2013, 3.7 percent for "Actual & Forecasted" up to 2014, and 3.9 percent for "Forecasted" up to 2015) show that the RDF administrative costs are below the Commission-required five percent cap on administrative costs.¹²

C. *CALCULATION OF THE 2015 RDF RIDER RATE*

1. *2013 Actual RDF Expenses*

Attachment 1 of the Petition describes the Company's 2013 RDF expenses and associated recovery, including:

- \$12,853,411 in 2013 total RDF expenses,
- \$12,448,260 in 2013 RDF expenditures allocated to the Minnesota Jurisdiction,
- \$669,827 in 2012 final true-up (deficit) to be recovered through the RDF Rider, and
- \$12,573,945 in 2013 RDF Rider revenues.

¹¹ 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).

¹² Source: Attachment 7 to these comments.

Based on the 2013 outcome of the Department's updated RDF tracker model as summarized in Attachment 1 of these comments, the Department concludes that Xcel's calculations described above are generally reasonable.

2. *2014 Actual (January-August 2014) and Forecast (September-December 2014) RDF Expenses*

Attachment 2 of the Petition describes the Company's 2014 RDF expenses and associated recovery. Actual results are reported for January to August and forecasts are reported for September to December. The 2014 RDF expenses and associated recovery include:

- \$21,812,806 in 2014 total RDF expenditures,
- \$21,715,896 in 2014 RDF expenditures allocated to the Minnesota Jurisdiction,
- \$544,142 in 2013 final true-up (deficit) to be recovered through the RDF Rider, and
- \$22,380,384 in 2014 RDF Rider revenues.

Based on the 2014 outcome of the Department's updated RDF tracker model as summarized in Attachment 2 of these comments, the Department concludes that Xcel's calculations described above are generally reasonable.

3. *2015 Forecast*

Attachment 3 of the Petition shows that the Company forecasts total 2015 RDF expenditures to be \$18,165,644 and forecasts 2015 RDF expenditures allocated to the Minnesota Jurisdiction to be \$18,158,383. After subtracting \$120,346 in estimated over-recovered RDF expenditures at the end of 2014 to the 2015 RDF expenditures allocated to the Minnesota Jurisdiction, the Company identified an amount of \$18,038,037 to be recovered in 2015. The Company then divided this amount by the 2015 sales forecast of 30,617,266,317 kWh to arrive at an RDF rate rider factor of \$0.000589 per kWh for 2015, with an expected cumulative balance of \$0 at the end of 2015.

Based on the 2015 outcome of the Department's updated RDF tracker model as summarized in Attachment 3 of these comments, the Department concludes that Xcel's calculations described above are reasonable. However, it appears that Xcel omitted to subtract the Minnesota Jurisdictional portion of the grant funds paid to AnAerobics that the Commission directed the Company to refund to customers. The Department concludes that this is an apparent oversight, since Xcel indicated in Attachment B to its January 28, 2014 Commission-required Refund Plan that the amount of \$811,518 will be subtracted from the expenses Xcel will propose to recover from its Minnesota ratepayers through the 2015 RDF rate factor.

Taking into account the Commission-required refund, the Department's calculation provides for a 2015 RDF rate rider factor of \$0.000563 per kWh instead of Xcel's proposed \$0.000589 per kWh.¹³

Therefore, unless Xcel can show in reply comments that the Company included the Commission-required refund in the calculation of the 2015 RDF factor or that it complied with the Commission's January 23, 2014 Order in Docket No. E002/M-00-1583 through a different process, the Department recommends that the Commission approve the 2015 RDF rate rider factor of \$0.000563 per kWh, beginning in January 2015, and require that Xcel file the appropriate updated tariff sheets within 30 days of the Commission's Order.

D. ADMINISTRATIVE COST ALLOCATOR

The Commission's July 11, 2004 Order at point 12 stated:¹⁴

The Commission hereby approves Xcel's proposal to revise its cost allocation procedures for administrative costs to allocate the administrative costs of Category A projects to all jurisdictions on the basis of the target funding guidelines adopted for each annual funding cycle.

This decision was based upon Xcel's February 9, 2004 Reply Comments in which the Company stated:

... we propose to allocate administrative costs for 2004 year based on the target funding guidelines set for the second funding cycle request for proposal... We would propose that this allocation be reviewed for reasonableness each October in the true-up filing, and adjusted if the proportion of spending among the categories changes with new RDF cycles.

The Department notes that the fourth RDF cycle will provide for a significant increase in funding allocated to Category A projects. However, the Department's review of Xcel's calculation of the administrative costs of Category A projects allocated to all jurisdictions shows that Xcel is using the same administrative cost allocator in 2013, 2014 and 2015 as was used in 2008 when the Company started operating under the third RDF cycle. Therefore, it appears that Xcel's administrative cost estimate calculations for the fourth RDF cycle are not consistent with the Commission's requirement set forth above.

The Department's calculations indicate that the 2015 RDF factor is not affected by increases in the assumed share of Category A projects. This is due to the relatively small amount of estimated administrative costs for the fourth RDF cycle incurred or to be incurred between 2013 and 2015. However, the Department recommends that the Commission require Xcel to provide the following information with its next RDF annual tracker report: (1)

¹³ Source: Attachment 3 (page 2 of 2) to these comments.

¹⁴ Docket No. E002/M-03-2018.

the level of the administrative cost allocator used, and (2) a narrative and documentation in support of the proposed level.

E. COMPLIANCE FILING

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.¹⁵

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

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, 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, 2013¹⁶
The total liability the Company has incurred under Minnesota Statutes 116C.779	\$226,250,000
The Company's aggregate payments for approved renewable development projects and legislative mandates	\$182,037,795
The total amount recovered through the fuel clause adjustment mechanism and RDF rate rider factor for RDF costs	\$12,202,440 (Fuel Clause) \$169,835,355 (RDF Rate Rider)
The unencumbered cumulative balance remaining in the fund	\$36,397,451

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

¹⁵ Order *Varying Rules to Permit Recovery of Renewable Development Fund Expenditures and Requiring Compliance Filing*, Docket No. E002/M-00-1583.

¹⁶ Source: Table 3 of Xcel's September 26, 2014 filing in Docket No. E002/M-14-814.

IV. DEPARTMENT RECOMMENDATION

Unless Xcel can show in reply comments that the Company included the Commission-required refund in the calculation of the 2015 RDF factor or that it complied with the Commission's January 23, 2014 Order in Docket No. E002/M-00-1583 through a different process, the Department recommends that the Commission approve the 2015 RDF rate rider factor of \$0.000563 per kWh, beginning in January 2015, and require that Xcel file the appropriate updated tariff sheets within 30 days of the Commission's Order.

The Department recommends that the Commission require Xcel to provide the following information with its next RDF annual tracker report: (1) the level of the administrative cost allocator used, and (2) a narrative and documentation in support of the proposed level.

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Attachment 1: Xcel's Actual 2013 RDF Budget (page 1 of 2)

Total Expense	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Total 2013
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 114,725	\$ 114,725	\$ -	\$ 114,725	\$ -	\$ -	\$ -	\$ 344,175
Cat A3	\$ -	\$ -	\$ 95,320	\$ 2,000,000	\$ -	\$ -	\$ 23,089	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,118,409
Total Cat A	\$ -	\$ -	\$ 95,320	\$ 2,000,000	\$ -	\$ 114,725	\$ 137,814	\$ -	\$ 114,725	\$ -	\$ -	\$ -	\$ 2,462,584
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ 17,320	\$ -	\$ -	\$ -	\$ 14,299	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 31,619
Cat B3	\$ -	\$ -	\$ 115,995	\$ 72,611	\$ -	\$ -	\$ 91,776	\$ -	\$ 165,167	\$ -	\$ 203,241	\$ -	\$ 648,790
Excelsior	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cat B	\$ 17,320	\$ -	\$ 115,995	\$ 72,611	\$ 14,299	\$ -	\$ 91,776	\$ -	\$ 165,167	\$ -	\$ 203,241	\$ -	\$ 680,409
IREE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
REP support to DOC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
MN Solar Rebate	\$ -	\$ 139,813	\$ 148,512	\$ 106,263	\$ 112,303	\$ 60,890	\$ 53,869	\$ 138,691	\$ 286,196	\$ 361,204	\$ 110,601	\$ 600,717	\$ 2,119,059
DOC Solar Incentive	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Solar Rewards Prog	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Solar Rewards Prog	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Subtotal	\$ -	\$ 139,813	\$ 148,512	\$ 106,263	\$ 112,303	\$ 60,890	\$ 53,869	\$ 138,691	\$ 286,196	\$ 361,204	\$ 110,601	\$ 600,717	\$ 2,119,059
REPI	\$ 605,937	\$ 675,036	\$ 589,284	\$ 1,660,120	\$ 644,499	\$ 582,003	\$ 465,986	\$ 419,094	\$ 295,972	\$ 408,639	\$ 506,999	\$ 559,331	\$ 7,412,900
Total Cost	\$ 623,257	\$ 814,850	\$ 949,111	\$ 3,838,994	\$ 771,102	\$ 757,617	\$ 749,445	\$ 557,785	\$ 862,060	\$ 769,843	\$ 820,841	\$ 1,160,048	\$ 12,674,952
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ 9,153	\$ 9,141	\$ 8,520	\$ 8,777	\$ 8,835	\$ 7,666	\$ 5,676	\$ 7,697	\$ 8,069	\$ 8,900	\$ 7,591	\$ 2,761	\$ 92,786
Admin Costs 4	\$ 271	\$ 293	\$ 72	\$ 190	\$ 15	\$ 27,644	\$ -	\$ 57,187	\$ -	\$ -	\$ -	\$ -	\$ 85,672
Total Adm Costs	\$ 9,424	\$ 9,433	\$ 8,592	\$ 8,967	\$ 8,849	\$ 35,311	\$ 5,676	\$ 64,885	\$ 8,069	\$ 8,900	\$ 7,591	\$ 2,761	\$ 178,458
Total RDF Cost	\$ 632,681	\$ 824,283	\$ 957,703	\$ 3,847,962	\$ 779,951	\$ 792,928	\$ 755,121	\$ 622,669	\$ 870,129	\$ 778,743	\$ 828,432	\$ 1,162,809	\$ 12,853,410

Minnesota Expense	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Total 2013
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 97,250	\$ 97,859	\$ -	\$ 97,342	\$ -	\$ -	\$ -	\$ 292,451
Cat A3	\$ -	\$ -	\$ 79,762	\$ 1,679,194	\$ -	\$ -	\$ 19,695	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,778,651
Total Cat A	\$ -	\$ -	\$ 79,762	\$ 1,679,194	\$ -	\$ 97,250	\$ 117,554	\$ -	\$ 97,342	\$ -	\$ -	\$ -	\$ 2,071,102
Total Cat B	\$ 17,320	\$ -	\$ 115,995	\$ 72,611	\$ 14,299	\$ -	\$ 91,776	\$ -	\$ 165,167	\$ -	\$ 203,241	\$ -	\$ 680,409
IREE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
REP support to DOC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
MN Solar Rebate	\$ -	\$ 139,813	\$ 148,512	\$ 106,263	\$ 112,303	\$ 60,890	\$ 53,869	\$ 138,691	\$ 286,196	\$ 361,204	\$ 110,601	\$ 600,717	\$ 2,119,059
DOC Solar Incentive	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Solar Rewards Prog	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Solar Rewards Prog	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Subtotal	\$ -	\$ 139,813	\$ 148,512	\$ 106,263	\$ 112,303	\$ 60,890	\$ 53,869	\$ 138,691	\$ 286,196	\$ 361,204	\$ 110,601	\$ 600,717	\$ 2,119,059
REPI	\$ 605,937	\$ 675,036	\$ 589,284	\$ 1,660,120	\$ 644,499	\$ 582,003	\$ 465,986	\$ 419,094	\$ 295,972	\$ 408,639	\$ 506,999	\$ 559,331	\$ 7,412,900
Total Cost	\$ 623,257	\$ 814,850	\$ 933,553	\$ 3,518,188	\$ 771,102	\$ 740,142	\$ 729,185	\$ 557,785	\$ 844,677	\$ 769,843	\$ 820,841	\$ 1,160,048	\$ 12,283,470
Admin Cost	\$ 8,666	\$ 8,671	\$ 7,891	\$ 8,248	\$ 8,168	\$ 32,621	\$ 5,258	\$ 60,100	\$ 7,458	\$ 8,195	\$ 6,982	\$ 2,531	\$ 164,789
Total RDF Cost	\$ 631,923	\$ 823,521	\$ 941,444	\$ 3,526,436	\$ 779,270	\$ 772,763	\$ 734,443	\$ 617,885	\$ 852,135	\$ 778,038	\$ 827,823	\$ 1,162,579	\$ 12,448,259

Attachment 1: Xcel's Actual 2013 RDF Budget (page 2 of 2)

OVERALL 2013 RDF TRACKER

	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Total 2013
Previous True Up	\$ 669,827												\$ 669,827
Expense	\$ 631,923	\$ 823,521	\$ 941,444	\$ 3,526,436	\$ 779,270	\$ 772,763	\$ 734,443	\$ 617,885	\$ 852,135	\$ 778,038	\$ 827,823	\$ 1,162,579	\$ 12,448,259
Revenue (Xcel)	\$ 1,266,011	\$ 956,300	\$ 990,463	\$ 1,003,177	\$ 955,718	\$ 927,988	\$ 1,210,046	\$ 1,149,537	\$ 1,154,247	\$ 1,036,109	\$ 892,906	\$ 1,031,442	\$ 12,573,945
Project Revenues*	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cumulative Balance	\$ 35,738	\$ (97,042)	\$ (146,061)	\$ 2,377,199	\$ 2,200,750	\$ 2,045,525	\$ 1,569,922	\$ 1,038,270	\$ 736,158	\$ 478,087	\$ 413,004	\$ 544,141	\$ 544,141

Input Data Source:

Up to August 2013, Xcel's electronic copy of the September 27, 2013 filing in Docket No. E002/M-13-905 provided in response to the Department's information request No. 1.

After August 2013, Xcel's electronic copy of the September 26, 2014 filing in Docket No. E002/M-14-814 provided in response to the Department's information request No. 1.

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

Attachment 2: Xcel's Forecast 2014 RDF Budget (page 1 of 2)

Total Expense	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Total 2014
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ 114,725	\$ -	\$ 477,650	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 592,355
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cat A	\$ -	\$ -	\$ 114,725	\$ -	\$ 477,650	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 592,355
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B3	\$ 88,488	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 88,488
Excelsior	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cat B	\$ 88,488	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 88,488
IREE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
REP support to DOC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
MN Solar Rebate	\$ 130,813	\$ 176,574	\$ 337,992	\$ 325,837	\$ 113,544	\$ 125,696	\$ 290,126	\$ 334,035	\$ 370,398	\$ 469,289	\$ 327,548	\$ 529,952	\$ 3,531,804
DOC Solar Incentive	\$ 12,021,295	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 12,021,295
Solar Rewards Prog	\$ -	\$ -	\$ -	\$ -	\$ 6,936	\$ 5,104	\$ 6,177	\$ 6,557	\$ 6,194	\$ 6,194	\$ 6,194	\$ 6,194	\$ 49,550
Subtotal	\$ 12,152,108	\$ 176,574	\$ 337,992	\$ 325,837	\$ 120,480	\$ 130,800	\$ 296,303	\$ 340,591	\$ 376,592	\$ 475,483	\$ 333,742	\$ 536,146	\$ 15,602,649
REPI	\$ 553,133	\$ 391,974	\$ 537,705	\$ 379,448	\$ 1,691,816	\$ 302,551	\$ 235,708	\$ 239,917	\$ 293,945	\$ 293,945	\$ 293,945	\$ 293,945	\$ 5,508,031
Total Cost	\$ 12,793,729	\$ 568,548	\$ 990,422	\$ 705,285	\$ 2,290,927	\$ 433,351	\$ 532,011	\$ 580,508	\$ 670,537	\$ 769,428	\$ 627,687	\$ 830,091	\$ 21,791,523
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ 1,207	\$ 29	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,236
Admin Costs 4	\$ -	\$ 130	\$ 262	\$ 6,351	\$ 460	\$ -	\$ 45	\$ 12,800	\$ -	\$ -	\$ -	\$ -	\$ 20,047
Total Adm Costs	\$ 1,207	\$ 159	\$ 262	\$ 6,351	\$ 460	\$ -	\$ 45	\$ 12,800	\$ -	\$ -	\$ -	\$ -	\$ 21,283
Total RDF Cost	\$ 12,794,936	\$ 568,707	\$ 990,684	\$ 711,636	\$ 2,290,387	\$ 433,351	\$ 532,056	\$ 593,308	\$ 670,537	\$ 769,428	\$ 627,687	\$ 830,091	\$ 21,812,807

Minnesota Expense	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Total 2014
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ 95,618	\$ -	\$ 401,500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 497,118
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cat A	\$ -	\$ -	\$ 95,618	\$ -	\$ 401,500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 497,118
Total Cat B	\$ 88,488	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 88,488
IREE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
REP support to DOC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
MN Solar Rebate	\$ 130,813	\$ 176,574	\$ 337,992	\$ 325,837	\$ 113,544	\$ 125,696	\$ 290,126	\$ 334,035	\$ 370,398	\$ 469,289	\$ 327,548	\$ 529,952	\$ 3,531,804
DOC Solar Incentive	\$ 12,021,295	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 12,021,295
Solar Rewards Prog	\$ -	\$ -	\$ -	\$ -	\$ 6,936	\$ 5,104	\$ 6,177	\$ 6,557	\$ 6,194	\$ 6,194	\$ 6,194	\$ 6,194	\$ 49,550
Subtotal	\$ 12,152,108	\$ 176,574	\$ 337,992	\$ 325,837	\$ 120,480	\$ 130,800	\$ 296,303	\$ 340,591	\$ 376,592	\$ 475,483	\$ 333,742	\$ 536,146	\$ 15,602,649
REPI	\$ 553,133	\$ 391,974	\$ 537,705	\$ 379,448	\$ 1,691,816	\$ 302,551	\$ 235,708	\$ 239,917	\$ 293,945	\$ 293,945	\$ 293,945	\$ 293,945	\$ 5,508,031
Total Cost	\$ 12,793,729	\$ 568,548	\$ 971,315	\$ 705,285	\$ 2,213,796	\$ 433,351	\$ 532,011	\$ 580,508	\$ 670,537	\$ 769,428	\$ 627,687	\$ 830,091	\$ 21,696,286
Admin Cost	\$ 1,107	\$ 146	\$ 240	\$ 5,826	\$ 424	\$ -	\$ 42	\$ 11,828	\$ -	\$ -	\$ -	\$ -	\$ 19,613
Total RDF Cost	\$ 12,794,836	\$ 568,694	\$ 971,555	\$ 711,111	\$ 2,214,220	\$ 433,351	\$ 532,053	\$ 592,336	\$ 670,537	\$ 769,428	\$ 627,687	\$ 830,091	\$ 21,715,999

Attachment 2: Xcel's Forecast 2014 RDF Budget (page 2 of 2)

OVERALL 2014 RDF TRACKER

	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	Total 2014
Previous True Up	\$544,141												\$ 544,141
Expense	\$12,794,836	\$ 568,694	\$ 971,555	\$ 711,111	\$ 2,214,220	\$ 433,351	\$ 532,053	\$ 592,336	\$ 670,537	\$ 769,428	\$ 627,687	\$ 830,091	\$ 21,715,899
Revenue (Xcel)	\$ 1,590,814	\$ 1,838,720	\$ 1,966,042	\$ 1,756,044	\$ 1,662,647	\$ 1,910,879	\$ 2,109,429	\$ 2,073,274	\$ 1,886,804	\$ 1,868,681	\$ 1,808,698	\$ 1,908,352	\$ 22,380,384
Project Revenues*	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cumulative Balance	\$11,748,164	\$10,478,138	\$ 9,483,651	\$ 8,438,718	\$ 8,990,291	\$ 7,512,763	\$ 5,935,387	\$ 4,454,449	\$ 3,238,182	\$ 2,138,929	\$ 957,917	\$ (120,344)	\$ (120,344)

Input Data Source:

Xcel's electronic copy of the September 26, 2014 filing in Docket No. E002/M-14-814 provided in response to the Department's information request No. 1.

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

Attachment 3: Xcel's Forecast 2015 RDF Budget (page 1 of 2)

Total Expense	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Total 2015
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cat A	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Excelsior	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cat B	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
IREE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
REP support to DOC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
MN Solar Rebate	\$ 227,103	\$ 262,896	\$ 438,243	\$ 421,602	\$ 208,201	\$ 195,354	\$ 368,739	\$ 380,675	\$ 370,398	\$ 469,289	\$ 327,548	\$ 529,952	\$ 4,200,000
DOC Solar Incentive	\$ -	\$ 12,021,295	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 12,021,295
Solar Rewards Prog	\$ 16,072	\$ 16,072	\$ 66,072	\$ 16,072	\$ 16,072	\$ 16,072	\$ 16,072	\$ 16,072	\$ 16,072	\$ 16,072	\$ 16,072	\$ 16,072	\$ 242,864
Subtotal	\$ 243,175	\$ 12,300,263	\$ 504,315	\$ 437,674	\$ 224,273	\$ 211,426	\$ 384,811	\$ 396,747	\$ 386,470	\$ 485,361	\$ 343,620	\$ 546,024	\$ 16,464,159
REPI	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 1,610,736
Total Cost	\$ 377,403	\$ 12,434,491	\$ 638,543	\$ 571,902	\$ 358,501	\$ 345,654	\$ 519,039	\$ 530,975	\$ 520,698	\$ 619,589	\$ 477,848	\$ 680,252	\$ 18,074,895
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Costs 4	\$ -	\$ -	\$ -	\$ 8,661	\$ 8,661	\$ 8,661	\$ 21,461	\$ 8,661	\$ 8,661	\$ 8,661	\$ 8,661	\$ 8,661	\$ 90,749
Total Adm Costs	\$ -	\$ -	\$ -	\$ 8,661	\$ 8,661	\$ 8,661	\$ 21,461	\$ 8,661	\$ 8,661	\$ 8,661	\$ 8,661	\$ 8,661	\$ 90,749
Total RDF Cost	\$ 377,403	\$ 12,434,491	\$ 638,543	\$ 580,563	\$ 367,162	\$ 354,315	\$ 540,500	\$ 539,636	\$ 529,359	\$ 628,250	\$ 486,509	\$ 688,913	\$ 18,165,644

Minnesota Expense	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Total 2015
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cat A	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cat B	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
IREE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
REP support to DOC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
MN Solar Rebate	\$ 227,103	\$ 262,896	\$ 438,243	\$ 421,602	\$ 208,201	\$ 195,354	\$ 368,739	\$ 380,675	\$ 370,398	\$ 469,289	\$ 327,548	\$ 529,952	\$ 4,200,000
DOC Solar Incentive	\$ -	\$ 12,021,295	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 12,021,295
Solar Rewards Prog	\$ 16,072	\$ 16,072	\$ 66,072	\$ 16,072	\$ 16,072	\$ 16,072	\$ 16,072	\$ 16,072	\$ 16,072	\$ 16,072	\$ 16,072	\$ 16,072	\$ 242,864
Subtotal	\$ 243,175	\$ 12,300,263	\$ 504,315	\$ 437,674	\$ 224,273	\$ 211,426	\$ 384,811	\$ 396,747	\$ 386,470	\$ 485,361	\$ 343,620	\$ 546,024	\$ 16,464,159
REPI	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 134,228	\$ 1,610,736
Total Cost	\$ 377,403	\$ 12,434,491	\$ 638,543	\$ 571,902	\$ 358,501	\$ 345,654	\$ 519,039	\$ 530,975	\$ 520,698	\$ 619,589	\$ 477,848	\$ 680,252	\$ 18,074,895
Admin Cost	\$ -	\$ -	\$ -	\$ 7,948	\$ 7,954	\$ 7,974	\$ 19,816	\$ 7,984	\$ 7,968	\$ 7,974	\$ 7,943	\$ 7,925	\$ 83,486
Total RDF Cost	\$ 377,403	\$ 12,434,491	\$ 638,543	\$ 579,850	\$ 366,455	\$ 353,628	\$ 538,855	\$ 538,959	\$ 528,666	\$ 627,563	\$ 485,791	\$ 688,177	\$ 18,158,381

Attachment 3: Xcel's Forecast 2015 RDF Budget (page 2 of 2)

OVERALL 2015 RDF TRACKER

	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15	Total 2015
Previous True Up	(\$120,344)												
Expense	\$ 377,403	\$12,434,491	\$ 638,543	\$ 579,850	\$ 366,455	\$ 353,628	\$ 538,855	\$ 538,959	\$ 528,666	\$ 627,563	\$ 485,791	\$ 688,177	\$ (120,344)
AnAerobics Refund													
Revenue (DOC)	\$ 1,466,184	\$ 1,314,172	\$ 1,400,350	\$ 1,282,134	\$ 1,333,239	\$ 1,484,344	\$ 1,679,333	\$ 1,629,376	\$ 1,425,274	\$ 1,410,500	\$ 1,365,030	\$ 1,436,584	\$ 811,518
Project Revenues*	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cumulative Balance	#####	\$ 9,911,195	\$ 9,149,388	\$ 8,447,104	\$ 7,480,320	\$ 6,349,604	\$ 5,209,126	\$ 4,118,709	\$ 3,222,101	\$ 2,439,164	\$ 1,559,925	\$ 811,518	\$ -

Net Expenses** (Thousands)	\$ 17,227
MWh Sales	30,617,266
2015 Factor	0.000563

Input Data Source: Xcel's electronic copy of the September 27, 2013 filing in Docket No. E002/M-13-905 provided in response to the Department's information request No. 1.

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

(**) Net Expenses = Expenses - AnAerobics Refund

Attachment 4

RDF Cycle 1 Category A projects (pp. 1-2)
RDF Cycle 1 Category B projects (pp. 3-4)

RDF Cycle 1: Category A projects' summaries as of June 30, 2014

Project Summary	Status	Start Date	Remarks
AB04 awarded to Greden Dairy & Crop Farm for a Methane Digester project	Withdrawn		
AB06 awarded to Minnesota Corn Processors for a Methane project	Withdrawn		
AB07 awarded to AnAerobics for a Waste to Methane project	Failed		Site control issue
AH01 awarded to Crown Hydro for a Hydro Development project	Ongoing	3-Apr-02	Site control issue
AS05 awarded to the Department for a Solar Rebate project	Complete		
AS06 awarded to the Science Museum of Minnesota for a Solar Roof project	Complete		
AW03 awarded to Project Resources Corporation for a Prototype Wind Turbine project	Complete		
AW10 awarded to Pipestone-Jasper School System for a Wind Turbine project	Complete		

Source: Xcel's 1st, 2nd and 3rd Cycle Quarterly Status and Progress Reports in Docket No. E002/M-00-1583, including the most recent Report filed on October 22, 2014.

RDF Cycle 1: Grant Awards and Funding Received by Category A projects

Award	2003	2004	2005	2006	2007	2008	2009	2010-13	Paid Up to 2013
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(l)
AB04									\$ -
AB06									\$ -
AB07	\$1,100,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$1,100,000
AH01	\$1,538,591	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$1,538,591
AS05	\$250,000	\$200,000	\$100,000	\$200,000	\$400,000	\$ -	\$ -	\$ -	\$1,150,000
AS06	\$100,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$100,000
AW03	\$900,000	\$21,000	\$96,000	\$765,000	\$ -	\$ -	\$ -	\$ -	\$900,000
AW10	\$752,835	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$752,835
Total	\$9,302,835	\$3,759,426	\$196,000	\$965,000	\$400,000	\$ -	\$ -	\$ -	\$5,541,426

Source: Department's calculations based on input data from Xcel's RDF Annual Reports spreadsheets provided in response to discovery.

RDF Cycle 1: Category B projects' summaries as of June 30, 2014

Project Summary	Status	Start Date	Remarks
BB03 was awarded to Sebesta Blomberg & Associates for a biomass project	Complete		
BB06 was awarded to Energy Performance Systems for a biomass project	Complete		
BB09 was awarded to the University of North Dakota for a biomass project	Complete		
BB10 was awarded to Community Power Corporation for a biomass project	Complete		
BB12 was awarded to the University of North Dakota for a biomass project	Complete		
BW06 was awarded to D.H. Blattner & Sons for a wind project	Complete		
CB07 was awarded to Colorado School of Mines for a biomass project	Complete		
CB08 was awarded to the University of North Dakota for a biomass project	Complete		
CS05 was awarded to National Renewable Energy Laboratory for a solar project	Complete		
CW02 was awarded to Global Energy Concepts for a wind project	Complete		
CW06 was awarded to the University of Minnesota for a wind project	Complete		

Source: Xcel's 1st, 2nd and 3rd Cycle Quarterly Status and Progress Reports in Docket No. E002/M-00-1583, including the most recent Report filed on October 22, 2014.

RDF Cycle 1: Grant Awards and Funding Received by Category B projects

Award	2003	2004	2005	2006	2007	2008	2009	2010-13	Paid Up to 2013
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(l)
BB03	\$ 738,654	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 738,645
BB06	\$ 266,508	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 257,247
BB09	\$ 444,478	\$ 145,263	\$ 173,603	\$ 428	\$ -	\$ -	\$ -	\$ -	\$ 444,442
BB10	\$ 638,635	\$ 482,172	\$ 66,520	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 548,692
BB12	\$ 60,000	\$ 13,920	\$ 8,751	\$ 16,941	\$ -	\$ -	\$ -	\$ -	\$ 59,981
BW06	\$ 68,470	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 62,346
CB07	\$ 1,116,742	\$ 175,333	\$ 286,494	\$ 185,632	\$ 119,745	\$ -	\$ 56,490	\$ -	\$ 1,116,742
CB08	\$ 1,250,142	\$ 369,526	\$ 237,809	\$ 191,877	\$ 66,275	\$ 62,748	\$ -	\$ -	\$ 1,250,057
CS05	\$ 934,628	\$ 382,692	\$ 401,257	\$ 79,581	\$ 71,102	\$ -	\$ (9,871)	\$ -	\$ 924,761
CW02	\$ 75,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 73,239
CW06	\$ 654,309	\$ 127,351	\$ 236,229	\$ 132,660	\$ 26,890	\$ -	\$ -	\$ -	\$ 654,309
Total	\$6,247,566	\$1,696,257	\$1,410,663	\$607,119	\$284,012	\$62,748	\$ 46,619	\$ -	\$6,130,461

Source: Department's calculations based on input data from Xcel's RDF Annual Reports spreadsheets provided in response to discovery.

Attachment 5

RDF Cycle 2 Category A projects (pp. 1-2)
RDF Cycle 2 Category B projects (pp. 3-4)

RDF Cycle 2: Category A projects' summaries as of June 30, 2014

Project Summary	Status	Start Date	PPA docket
EP24 was awarded to Wayzata Public School for a wind project	Withdrawn		
EP25 was awarded to the University of Minnesota for a biomass project	Withdrawn		
EP26 was awarded to Hilltop Power for a wind project	Complete		
EP29 was awarded to Ripley Dairy for a biomass project	Withdrawn		
EP34 was awarded to Saint Anthony Falls Hydroelectric for a hydroelectric proj	Complete		06-1197
EP39 was awarded to Saint Olaf College for a wind project	Complete		07-97
EP44 was awarded to Central Minnesota Ethanol Cooperative for a biomass pro	Failed*		06-1295
EP49 was awarded to Rapids Energy Center for a biomass project	Withdrawn		
EP50 was awarded to Little Falls for a hydroelectric project	Withdrawn		
EP51 was awarded to Diamond K and Greden's Ponderosa Dairy Digester (bior	Complete		10-486

Source: Xcel's 1st, 2nd and 3rd Cycle Quarterly Status and Progress Reports in Docket No. E002/M-00-1583, including the most recent Report filed on October 22, 2014.

* Most recent information on the Central Minnesota Ethanol project was filed with Xcel's November 13, 2012 reply comments in Docket No. E002/M-12-1062.

RDF Cycle 2: Grant Awards and Funding Received by Category A projects

	Award	2006	2007	2008	2009	2010	2011	2012-2013	Paid Up
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	to 2013
									(i)
EP24	\$ 1,200,000	\$ -	\$ -	\$ 1,080,000	\$ 120,000	\$ -	\$ -	\$ -	\$ -
EP25	\$ -	\$ -	\$ 336,360	\$ -	\$ -	\$ 40,910	\$ 1,500,000	\$ -	\$ -
EP26	\$ 2,000,000	\$ -	\$ 1,500,000	\$ -	\$ 122,730	\$ -	\$ -	\$ -	\$ 1,200,000
EP29	\$ 1,500,000	\$ -	\$ 1,600,000	\$ (1,600,000)	\$ -	\$ -	\$ -	\$ -	\$ -
EP34	\$ 2,000,000	\$ 400,000	\$ 1,600,000	\$ (1,600,000)	\$ -	\$ -	\$ -	\$ -	\$ 2,000,000
EP39	\$ 1,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,500,000
EP44	\$ 2,000,000	\$ 400,000	\$ 1,600,000	\$ (1,600,000)	\$ -	\$ -	\$ -	\$ -	\$ 400,000
EP49	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
EP50	\$ 936,530	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 344,175	\$ -
EP51	\$ 7,636,530	\$ 400,000	\$ 3,436,360	\$ (520,000)	\$ 242,730	\$ 40,910	\$ 1,500,000	\$ 344,175	\$ 344,175
Total									
	\$ 7,636,530	\$ 400,000	\$ 3,436,360	\$ (520,000)	\$ 242,730	\$ 40,910	\$ 1,500,000	\$ 344,175	\$ 5,444,175

Source: Department's calculations based on input data from Xcel's RDF Annual Reports spreadsheets provided in response to discovery.

Attachment 5

RDF Cycle 2: Category B projects' summaries as of June 30, 2014

Project Summary	Status	Start Date	Remarks
RD22 was awarded to Energy Conversion Devices for a biofuel project	Complete		
RD26 was awarded to Coaltec Energy USA for a biomass project	Complete		
RD27 was awarded to Rural Advantage for a biomass project	Complete		
RD29 was awarded to the University of Minnesota for a biofuel project	Complete		
RD34 was awarded to the University of Florida for a biomass project	Complete		
RD37 was awarded to Clipper Windpower for a wind project	Withdrawn		
RD38 was awarded to Gas Technology Institute for a biomass project	Complete		
RD50 was awarded to Energy Performance Systems for a biomass project	Complete		
RD56 was awarded to the University of Minnesota for a biomass project	Complete		
RD57 was awarded to WindLogics for a wind project	Complete		
RD69 was awarded to Agricultural Utilization Research Institute for a hybrid pr Complete	Complete		
RD72 was awarded to Production Specialties for a biomass project	Complete		
RD78 was awarded to InterPhases Research for a solar project	Complete		
RD87 was awarded to Global Energy Concepts for a wind project	Complete		
RD93 was awarded to National Renewable Energy Laboratory for a solar projec Complete	Complete		
RD94 was awarded to Center for Energy and Environment for a biomass project Complete	Complete		
RD107 was awarded to National Renewable Energy Laboratory for a solar proje Complete	Complete		
RD110 was awarded to Iowa State University for a biofuel project	Complete		Documentation

Source: Xcel's 1st, 2nd and 3rd Cycle Quarterly Status and Progress Reports in Docket No. E002/M-00-1583, including the most recent Report filed on October 22, 2014.

Attachment 5

RDF Cycle 2: Grant Awards and Funding Received by Category B projects

	Award	2005/06	2007	2008	2009	2010	2011	2012-2013	Paid Up to 2013
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)
RD22	\$ 900,000	\$ 411,428	\$ 488,571	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 899,999
RD26	\$ 450,000	\$ 137,500	\$ 312,500	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 450,000
RD27	\$ 318,800	\$ -	\$ 53,521	\$ 106,528	\$ -	\$ 158,750	\$ -	\$ -	\$ 318,799
RD29	\$ 299,284	\$ -	\$ 172,996	\$ 126,288	\$ -	\$ -	\$ -	\$ -	\$ 299,284
RD34	\$ 999,995	\$ 105,394	\$ 311,764	\$ -	\$ 579,717	\$ -	\$ -	\$ -	\$ 996,875
RD37									\$ -
RD38	\$ 861,860	\$ 166,037	\$ 695,823	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 861,860
RD50	\$ 957,929	\$ 59,306	\$ 314,030	\$ 149,778	\$ 167,452	\$ 38,003	\$ -	\$ 229,360	\$ 957,929
RD56	\$ 858,363	\$ 232,083	\$ 447,491	\$ 123,672	\$ -	\$ -	\$ -	\$ -	\$ 803,246
RD57	\$ 997,000	\$ 500,485	\$ 265,015	\$ 231,500	\$ -	\$ -	\$ -	\$ -	\$ 997,000
RD69	\$ 760,000	\$ 126,667	\$ 134,000	\$ 499,333	\$ -	\$ -	\$ -	\$ -	\$ 760,000
RD72	\$ 228,735	\$ -	\$ 45,747	\$ -	\$ 182,988	\$ -	\$ -	\$ -	\$ 228,735
RD78	\$ 1,000,000	\$ 280,790	\$ 347,307	\$ 371,903	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000
RD87	\$ 370,000	\$ -	\$ -	\$ 250,000	\$ 120,000	\$ -	\$ -	\$ -	\$ 370,000
RD93	\$ 1,000,000	\$ 333,336	\$ 361,114	\$ 305,550	\$ (55,548)	\$ 4,553	\$ -	\$ -	\$ 949,005
RD94	\$ 397,500	\$ 192,875	\$ 204,625	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 397,500
RD107	\$ 1,000,000	\$ 333,336	\$ 361,114	\$ 305,550	\$ (55,548)	\$ -	\$ -	\$ -	\$ 944,452
RD110	\$ 405,000	\$ 57,300	\$ 41,043	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 98,343
Total	\$11,804,466	\$2,936,537	\$4,556,661	\$2,470,102	\$939,061	\$201,306	\$-	\$229,360	\$11,333,027
Excelsior	\$10,000,000	4,000,000	\$1,707,182	\$390,776	\$3,171,035	\$731,007	\$-	\$-	\$10,000,000

Source: Department's calculations based on input data from Xcel's RDF Annual Reports spreadsheets provided in response to discovery.

Attachment 6

Page 1 of 4

RDF Cycle 3 Category A projects (pages 1 and 2)
RDF Cycle 3 Category B projects (pages 3 and 4)

RDF Cycle 3: Category A projects' summaries as of June 30, 2014

Project Summary	Status	Start Date	PPA docket
EP3-2 was awarded to Merrick, Inc. for a solar project	Complete		
EP3-3 was awarded to Best Power International for a solar project	Complete		09-1481
EP3-5 was awarded to American Crystal Sugar Company for a biomass project	Withdrawn		
EP3-10 was awarded to Outland Renewable Energy for a solar project	Complete		11-490
EP3-11 was awarded to City of Minneapolis for a solar project	Complete		
EP3-12 was awarded to Freenerg for a solar project	Complete		
EP3-13 was awarded to MN Department of Natural Resources for a solar project	Complete		

Source: Xcel's 1st, 2nd and 3rd Cycle Quarterly Status and Progress Reports in Docket No. E002/M-00-1583, including the most recent Report filed on October 22, 2014.

RDF Cycle 3: Grant Awards and Funding Received by Category A projects

Award	2008	2009	2010	2011	2012	2013	Paid Up to 2013
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)
EP3-2	\$ 735,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 735,000
EP3-3	\$ 1,994,480	\$ -	\$ 1,994,480	\$ -	\$ -	\$ -	\$ 1,994,480
EP3-5							\$ -
EP3-10	\$ 2,000,000	\$ -	\$ -	\$ -	\$ -	\$ 2,000,000	\$ 2,000,000
EP3-11	\$ 2,000,000	\$ -	\$ -	\$ 1,750,000	\$ 250,000	\$ -	\$ 2,000,000
EP3-12	\$ 1,488,922	\$ 203,590	\$ 1,140,707	\$ 144,625	\$ -	\$ -	\$ 1,488,922
EP3-13	\$ 894,000	\$ 1,500	\$ 26,500	\$ 506,181	\$ 226,376	\$ 118,409	\$ 878,966
Total	\$ 9,112,402	\$ 205,090	\$ 3,161,687	\$ 2,400,806	\$ 476,376	\$ 2,118,409	\$ 9,097,368

Source: Department's calculations based on input data from Xcel's RDF Annual Reports spreadsheets provided in response to discovery.

Attachment 6

RDF Cycle 3: Category B projects' summaries as of June 30, 2014

Project Summary	Status	Start Date	Remarks
RD3-1 was awarded to the University of Minnesota for a biomass project	Ongoing	22-Oct-08	Final Report
RD3-2 was awarded to Sar Tec Corporation for a biofuel project	Complete		
RD3-4 was awarded to Bepex International for a biomass project	Complete		
RD3-12 was awarded to Xcel Energy for a wind project	Complete		
RD3-21 was awarded to Northern Plains Power Technologies for a solar PV project	Complete		
RD3-23 was awarded to the University of Minnesota for a biomass project	Complete		
RD3-25 was awarded to the University of Minnesota for a solar PV project	Complete		
RD3-28 was awarded to the University of Minnesota for a biomass project	Complete		
RD3-42 was awarded to the University of Minnesota for a wind project	Complete		
RD3-53 was awarded to Interphases Research for a solar PV project	Complete		
RD3-58 was awarded to West Central Telephone Association for a wind project	Complete		
RD3-63 was awarded to Community Power Corporation for a biomass project	Withdrawn		
RD3-66 was awarded to University of North Dakota for a biomass project	Complete		
RD3-68 was awarded to University of North Dakota for a biomass project	Complete		
RD3-69 was awarded to Minnesota Valley Alfalfa Producers for a biomass project	Ongoing	23-Feb-11	Milestone reports
RD3-71 was awarded to University of North Dakota for a biomass project	Complete		
RD3-77 was awarded to Coaltec Energy USA for a biomass project	Ongoing	22-Oct-08	Missing 2 milestones

Source: Xcel's 1st, 2nd and 3rd Cycle Quarterly Status and Progress Reports in Docket No. E002/M-00-1583, including the most recent Report filed on October 22, 2014.

RDF Cycle 3: Grant Awards and Funding Received by Category B projects

	Award		2008		2009		2010		2011		2012		2013		Paid Up to 2013	
	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)
RD3-1	\$ 992,989	\$ -	\$ 49,828	\$ 55,741	\$ 377,344	\$ 122,943	\$ 207,771	\$ 813,627								
RD3-2	\$ 350,000	\$ -	\$ 130,000	\$ 170,000	\$ 50,000	\$ -	\$ -	\$ 350,000								
RD3-4	\$ 924,671	\$ -	\$ 460,119	\$ 413,268	\$ 51,284	\$ -	\$ -	\$ 924,671								
RD3-12	\$ 1,000,000	\$ -	\$ 740,027	\$ 159,973	\$ -	\$ 100,000	\$ -	\$ 1,000,000								
RD3-21	\$ 493,608	\$ -	\$ 45,000	\$ 195,000	\$ 105,000	\$ 148,608	\$ -	\$ 493,608								
RD3-23	\$ 819,159	\$ -	\$ 185,713	\$ 304,691	\$ 239,313	\$ -	\$ -	\$ 729,717								
RD3-25	\$ 732,032	\$ -	\$ 170,044	\$ 317,425	\$ 244,563	\$ -	\$ -	\$ 732,032								
RD3-28	\$ 979,082	\$ -	\$ 57,942	\$ 138,695	\$ 243,687	\$ 262,872	\$ 275,852	\$ 979,048								
RD3-42	\$ 999,999	\$ -	\$ -	\$ 462,936	\$ 251,065	\$ 120,432	\$ 165,167	\$ 999,600								
RD3-53	\$ 1,000,000	\$ -	\$ 285,000	\$ 222,573	\$ 296,966	\$ 195,461	\$ -	\$ 1,000,000								
RD3-58	\$ 137,000	\$ -	\$ 123,300	\$ 13,700	\$ -	\$ -	\$ -	\$ 137,000								
RD3-63																
RD3-66	\$ 999,065	\$ -	\$ 133,991	\$ 268,364	\$ 539,667	\$ 56,675	\$ -	\$ 998,697								
RD3-68	\$ 970,558	\$ -	\$ 267,542	\$ 472,501	\$ 158,288	\$ 72,149	\$ -	\$ 970,480								
RD3-69	\$ 1,000,000	\$ -	\$ -	\$ -	\$ 93,500	\$ 69,068	\$ -	\$ 162,568								
RD3-71	\$ 999,728	\$ -	\$ 180,032	\$ 346,609	\$ 392,285	\$ 80,513	\$ -	\$ 999,439								
RD3-77	\$ 1,000,000	\$ 100,000	\$ 100,000	\$ 650,000	\$ -	\$ -	\$ -	\$ 850,000								
Total	\$ 13,397,891	\$ 100,000	\$ 2,928,538	\$ 4,191,475	\$ 3,042,962	\$ 1,228,721	\$ 648,790	\$ 12,140,486								

Source: Department's calculations based on input data from Xcel's RDF Annual Reports spreadsheets provided in response to discovery.

Attachment 7 Compliance with the Commission's 5% cap on Administrative Costs

	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	Forecast	Actuals	Forecast	Actuals	Forecast	Actuals	Act/Forc	Forecast
(Thousand of \$)																				
1. RDF Grant Payments	\$ 1,917	\$ 3,762	\$ 6,753	\$ 10,384	\$ 3,239	\$ 7,533	\$ 8,326	\$ 6,944	\$ 1,903	\$ 3,143	\$ 681	\$ -	\$ 53,904	\$ 54,585	\$ 54,585	\$ 54,585				
2. Administrative Expenses	\$ 342	\$ 135	\$ 189	\$ 432	\$ 226	\$ 118	\$ 147	\$ 140	\$ 102	\$ 178	\$ 21	\$ 91	\$ 2,009	\$ 2,030	\$ 2,030	\$ 2,121				
Ratio of Admin. Expenses (2/1)	17.9%	3.6%	2.8%	4.2%	7.0%	1.6%	1.8%	2.0%	5.3%	5.7%	3.1%	3.7%	3.7%	3.7%	3.7%	3.9%				

Attachment 8

RDF Grant Payments, Administrative Costs, Other Legislative Mandates Expenditures, Grants Awarded and Unencumbered Cumulative Balance (UCB) as of December 31, 2013

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	Grant Payment 2003-2013	Amount of Awards
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	\$ 59,686,943	\$ 67,501,690
Cat A1	\$ 3,759,426	\$ 221,000	\$ 196,000	\$ 965,000	\$ 400,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 5,541,426	\$ 9,302,835
Cat A2	\$ -	\$ -	\$ -	\$ 400,000	\$ 3,436,360	\$ (520,000)	\$ 242,750	\$ 40,910	\$ 1,500,000	\$ -	\$ -	\$ 344,175	\$ 7,636,530
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 735,000	\$ 205,090	\$ 3,161,687	\$ 2,400,806	\$ 476,376	\$ 2,118,409	\$ 9,097,368	\$ 9,112,402
a. Total Cat 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	\$ 20,082,969	\$ 26,051,767
Cat B1	\$ 2,023,043	\$ 1,696,257	\$ 1,410,663	\$ 607,119	\$ 284,012	\$ 62,748	\$ 46,619	\$ -	\$ -	\$ -	\$ -	\$ 6,130,461	\$ 6,247,566
Cat B2	\$ -	\$ -	\$ 155,247	\$ 2,781,290	\$ 4,556,661	\$ 2,470,102	\$ 939,061	\$ 201,306	\$ -	\$ 197,741	\$ 31,619	\$ 11,333,027	\$ 11,804,466
Cat B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 100,000	\$ 2,928,538	\$ 4,191,475	\$ 3,042,962	\$ 1,228,721	\$ 648,790	\$ 12,140,486	\$ 13,397,891
b. Total Cat 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	\$ 29,603,974	\$ 31,449,923
c. Excelsior	\$ -	\$ -	\$ 2,000,000	\$ 2,000,000	\$ 1,707,182	\$ 390,776	\$ 3,171,035	\$ 731,007	\$ -	\$ -	\$ -	\$ 10,000,000	\$ 10,000,000
2. Total Admin. Costs	\$ 207,922	\$ 342,318	\$ 135,367	\$ 188,680	\$ 431,953	\$ 225,704	\$ 118,052	\$ 147,233	\$ 139,627	\$ 101,532	\$ 178,458	\$ 2,216,846	
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	\$ 120,134,002	
Un. of Minnesota/REE	\$ 10,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,500,000	\$ 5,000,000	\$ 5,000,000	\$ 2,500,000	\$ -	\$ 25,000,000	
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	\$ 77,449,341	
AURI Biofuel	\$ -	\$ -	\$ 150,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 150,000	
MPCA Deposit	\$ -	\$ -	\$ -	\$ -	\$ (4,000,000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ (4,000,000)	
Next Generation Initiative	\$ -	\$ -	\$ -	\$ -	\$ 3,812,511	\$ 7,625,000	\$ 3,812,500	\$ -	\$ -	\$ -	\$ -	\$ 15,250,011	
REP Admin. by DOC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 675,000	\$ 987,500	\$ 312,500	\$ -	\$ -	\$ 1,975,000	
MN Solar Rebates	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 382,541	\$ 1,808,051	\$ 2,119,059	\$ 4,309,650	
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	\$ 182,037,792	

As of December 31, 2013

1. Amount Credited to RDF	\$ 226,250,000
2. Total RDF Payments	\$ 182,037,792
3. Awards	\$ 67,501,690
4. RDF Grants Paid	\$ 59,686,943
Unencumbered Cum. Ba	\$ 36,397,461
(1-2-3+4)	

*Assumes that all remaining RDF projects will meet their milestones.

Attachment 9

- Non Public Document – Contains Trade Secret Data
 Public Document – Trade Secret Data Excised
 Public Document

Xcel Energy

Docket No.: E002/M-14-814

Response To: Department of Commerce Information Request No. 001

Requestor: Samir Ouanes

Date Received: October 2, 2014

Question:

Subject: Electronic copy of Tables and Attachments in Xcel's September 26, 2014 filing

1. Please provide an electronic copy (Excel spreadsheet) of the tables and attachments included in Xcel's September 26, 2014 initial filing in Docket No. E002/M-14-814, with all links and formulas intact.
2. Please explain whether and how this electronic copy and the instant filing are in compliance with the Commission's December 21, 2012 Order in Docket No. E002/M-12-1062 requiring that Xcel "enter any source data in its RDF tracker model only once as an input data, to alleviate the reoccurrence of discrepancies and inconsistencies in the RDF tracker account provided in the Company's RDF petitions."
3. Please explain whether and how this electronic copy and the instant filing are in compliance with the Commission's December 21, 2012 Order in Docket No. E002/M-12-1062 requiring that Xcel "identify at the time of its future initial RDF filings any actual numbers that have changed from a previous report, with a complete justification as required by the Commission's February 17, 2012 Order in Docket No. E002/M-11-1007."

Response:

1. Included with this response is DOC-001 Att 1.xls, containing the attachments from the initial filing in Docket No. E002/M-14-814 with all links and formulas intact. Also attached is DOC-001 Att 2.xls, containing the data used to create the tables and graphs in the text of the initial filing.
2. The source data used to create the attachments in the initial filing is part of the file included with this response. Actual data and forecast data are entered into the file only once in the respective worksheets and all of the attachments are populated using that source data.

Because the rate rider calculation uses only a subset of the entire forecast payments, a third worksheet in the same file is used to create the final rate rider payment forecast. This third worksheet takes the entered forecast data and applies a toggle to include or exclude in the rate rider calculation.

The tables included in the text of the filing use the same source data referenced above. These spreadsheet modifications allow the Company to comply with the Commission's December 21, 2012 Order in Docket No. E002/M-12-1062.

3. The actual and forecast data in the initial filing was reviewed by the external auditing company Price-Waterhouse Coopers. This review found no changes in the actual data from what was filed in Docket No. E002/M-13-905.

Preparer: Mary Pope
Title: Senior Rate Analyst
Department: Revenue Requirements North
Telephone: 612-330-6574
Date: October 9, 2014

Attachment 10

- Non Public Document – Contains Trade Secret Data
 Public Document – Trade Secret Data Excised
 Public Document

Xcel Energy

Docket No.: E002/M-14-814

Response To: Department of Commerce Information Request No. 002

Requestor: Samir Ouanes

Date Received: October 2, 2014

Question:

Subject: RDF actual and forecasted payments for REPI in Xcel's September 26, 2014 filing

1. Please identify the Minnesota Legislative Mandates that govern the RDF payments for the Renewable Energy Production Incentives (REPI).
2. Please identify the amounts of RDF actual and forecasted payments for REPI in 2013, 2014 and 2015.
3. Given the annual amounts identified in response to question 2 above, please state whether Xcel is in compliance with the mandates identified in response to question 1 above.
4. Please fully support your answer to question 3 above.

Response:

1. As stated on page six of the petition, the legislation that governs the RDF payment for REPI is Minn. Stat. §116C.779, Subd. 2. and Minn. Stat. §216C.41.
2.

<u>Year</u>	<u>Actual</u>	<u>Forecasted</u>	<u>Total</u>	<u>Source</u>
2013	\$7,412,901	\$0	\$7,412,901	Attachment 1
2014	\$4,332,251	\$1,175,779	\$5,508,030	Attachment 2
2015	\$0	\$1,610,736	\$1,610,736	Attachment 3

Forecasted amounts meet known and measurable criteria established by the Commission's March 17, 2011 Order in Docket No. E002/M-10-1054.

3. The Company believes it is in compliance.

4. As summarized on page six of the petition, statute mandates by law 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. Statute authorizes an incentive payment of 1.0 cents per kWh for wind projects through December 31, 2018, biogas projects through December 31, 2015, and hydro projects through December 31, 2021. The annual amounts identified above and included in the RDF rate rider for cost recovery are the aggregate incentive payment for qualifying wind, biogas, or hydroelectric facilities as reported or projected by the Minnesota Department of Commerce who administers this incentive program.
-

Preparer: Mark Ritter
Title: RDF Grant Administrator
Department: Regulatory and Compliance
Telephone: 612-330-6739
Date: October 9, 2014

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Xcel Energy

Docket No.: E002/M-14-814

Response To: Department of Commerce Information Request No. 003

Requestor: Samir Ouanes

Date Received: October 2, 2014

Question:

Subject: RDF actual and forecasted payments for Minnesota Bonus Solar Rebate Program in Xcel's September 26, 2014 filing

1. Please identify the Minnesota Legislative Mandates that govern the RDF payments for the Minnesota Bonus Solar Rebate (MBSR) Program.
2. Please identify the amounts of RDF actual and forecasted payments for the MBSR program in state fiscal years 2012, 2013, 2014 and 2015.
3. Given the annual amounts identified in response to question 2 above, please state whether Xcel is in compliance with the mandates identified in response to question 1 above.
4. Please fully support your answer to question 3 above.

Response:

1. As stated on page six of the petition, the legislation that governs the RDF payment for the MBSR Program is Minn. Stat. §116C.7791, Subd. 5.

2.	<u>Year</u>	<u>Actual</u>	<u>Forecasted</u>	<u>Total</u>	<u>Source</u>
	2012	\$1,808,050	\$0	\$1,808,050	Actual Data
	2013	\$2,119,059	\$0	\$2,119,059	Actual Data
	2014	\$1,834,617	\$1,697,187	\$3,531,804	Actual Data/Frcst RECOVERY
	2015	\$0	\$4,200,000	\$4,200,000	Forecast Data RECOVERY

Forecasted amounts meet known and measurable criteria established by the Commission's March 17, 2011 Order in Docket No. E002/M-10-1054.

3. The Company believes it is in compliance.

4. As summarized on page six through seven of the petition, statute mandates by law 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 appropriates \$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. There are two businesses producing solar panels in Minnesota that qualify for the Minnesota Bonus solar rebates: tenKsolar in Bloomington, Minnesota and Silicon Energy in Mountain Iron, Minnesota. The annual amounts identified above and included in the RDF rate rider for cost recovery are the aggregate Minnesota Bonus rebates for qualifying solar facilities as reported or projected by Xcel Energy who administers this rebate program.

Preparer: Mark Ritter
Title: RDF Grant Administrator
Department: Regulatory and Compliance
Telephone: 612-330-6739
Date: October 9, 2014

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Xcel Energy

Docket No.: E002/M-14-814

Response To: Department of Commerce Information Request No. 004

Requestor: Samir Ouanes

Date Received: October 2, 2014

Question:

Subject: RDF actual and forecasted payments for “Made in Minnesota” Solar Energy Production Incentive Account in Xcel’s September 26, 2014 filing

1. Please identify the Minnesota Legislative Mandates that govern the RDF payments for the “Made in Minnesota” Solar Energy Production Incentive (MMSEPI) Account.
2. Please identify the amounts of RDF actual and forecasted payments for the MMSEPI account in 2013, 2014 and 2015.
3. Given the annual amounts identified in response to question 2 above, please state whether Xcel is in compliance with the mandates identified in response to question 1 above.
4. Please fully support your answer to question 3 above.

Response:

1. As stated on page seven of the petition, the legislation that governs the RDF payment for the MMSEPI Account is Minn. Stat. §216C.412.

<u>Year</u>	<u>Actual</u>	<u>Forecasted</u>	<u>Total</u>	<u>Source</u>
2013	\$0	\$0	\$0	Actual Data
2014	\$12,021,295	\$0	\$12,021,295	Actual Data/Frcst Data RECOVERY
2015	\$0	\$12,021,295	\$12,021,295	Forecast Data RECOVERY

Forecasted amounts meet known and measurable criteria established by the Commission’s March 17, 2011 Order in Docket No. E002/M-10-1054.

3. The Company believes it is in compliance.

4. As summarized on page seven and eight of the petition, statute mandates by law the establishment of a “Made in Minnesota” solar energy production incentive account which will be a separate account in the special revenue fund in the state treasury. For a total of ten years, beginning January 1, 2014 and each January 1 through to 2023, large public electric utilities that are required to fund energy Conservation Improvement Programs (CIP) must annually pay to the Commissioner of Commerce five percent of their minimum CIP spending for the year. Funds from the RDF are to be paid to the commissioner in an amount that, when added to the amount paid by the large public electric utilities, totals \$15,000,000 annually.

For the year 2015, the Company expects to pay \$12,021,295 to the Commissioner of Commerce, based on the following formula:

Total Minimum CIP Spending Requirement	=	\$59,574,100
<u>X</u>		<u>5.0%</u>
Total Electric Utility Share	=	\$2,978,705
RDF Share	+	<u>\$12,021,295</u>
Total 2014 Annual Payment to Incentive Account	=	\$15,000,000

In an August 2, 2014 Order the Commission extending the 2013-2015 CIP Triennial plans through 2016 (Docket Nos. E,G001/CIP-12-484, CIP Triennial Plans Through 2016 E,G002/CIP-12-447, G004/CIP-12-573, G007,G011/CIP-12-548, G008/CIP-12-564, G022/CIP-12-690, E,G002/CIP-12-447.01, E,G002/CIP-12-447.02, E,G002/CIP-12-447.03, E,G002/CIP-12-447.04, E,G002/CIP-12-447.05, G008/CIP-564.01, E002,G002,G008/CIP-09-131). Therefore for the year 2015, the Company expects to pay \$12,021,295 to the Commissioner of Commerce, based on same formula used to calculate the 2014 RDF share since the total minimum CIP spending requirements will remain the same through 2016.

Preparer: Mark Ritter
 Title: RDF Grant Administrator
 Department: Regulatory and Compliance
 Telephone: 612-330-6739
 Date: October 9, 2014

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Xcel Energy

Docket No.: E002/M-14-814

Response To: Department of Commerce Information Request No. 005

Requestor: Samir Ouanes

Date Received: October 2, 2014

Question:

Subject: RDF actual and forecasted payments for the “Solar Energy Incentive Program” in Xcel’s September 26, 2014 filing

1. Please identify the Minnesota Legislative Mandates that govern the RDF payments for the “Solar Energy Incentive Program.”
2. Please identify the amounts of RDF actual and forecasted payments for the “Solar Energy Incentive Program” account in 2013, 2014 and 2015.
3. Given the annual amounts identified in response to question 2 above, please state whether Xcel is in compliance with the mandates identified in response to question 1 above.
4. Please fully support your answer to question 3 above.

Response:

1. As stated on page eight of the petition, the legislation that governs the RDF payment for the Solar Energy Incentive Program is Minn. Stat. §116C.7792.

<u>Year</u>	<u>Actual</u>	<u>Forecasted</u>	<u>Total</u>	<u>Source</u>
2013	\$0	\$0	\$0	Actual Data
2014	\$24,774	\$24,776	\$49,550	Actual Data/Frcst Data RECOVERY
2015	\$0	\$242,864	\$242,864	Forecast Data RECOVERY

Forecasted amounts meet known and measurable criteria established by the Commission’s March 17, 2011 Order in Docket No. E002/M-10-1054.

3. The Company believes it is in compliance.

4. As summarized on page eight of the petition, Solar Energy Standards established by Statute directed the Company to establish a solar energy incentive program to be funded in full by RDF funds. Statute defined that the program shall be operated for five consecutive calendar years commencing in 2014. \$5,000,000 shall be allocated for each of the five years from the RDF. The production incentive is to be paid over the course of 10 years, commencing with the commission of the system. On October 31, 2013 Xcel Energy filed a program proposal (Docket No. E,G002/CIP-13-1015) with the Department of Commerce seeking approval of the Company's new Solar*Rewards program and closure of the existing program. On March 28, 2014, the Department approved the proposal to launch the new Solar*Rewards program. The new Solar*Rewards program launched on August 4, 2014.

Preparer: Mark Ritter
Title: RDF Grant Administrator
Department: Regulatory and Compliance
Telephone: 612-330-6739
Date: October 9, 2014

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
Comments**

Docket No. E002/M-14-814

Dated this 27th day of October 2014

/s/Sharon Ferguson

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