



414 Nicollet Mall  
Minneapolis, MN 55401

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

May 26, 2017

—Via Electronic Filing—

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

RE: PETITION  
SOLAR ENERGY STANDARD CUSTOMER EXCLUSION COST TREATMENT  
DOCKET NO. E002/M-17-\_\_\_\_

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Petition for approval of cost treatment relating to customers excluded from the Solar Energy Standard.

Attachment 2 to this filing is marked as “Not Public” as it contains information the Company considers to be trade secret data as defined by Minn. Stat. § 13.37(1)(b). The information contains confidential pricing and information that derives an independent economic value from not being generally known or readily ascertainable by others who could obtain a financial advantage from its use. Thus Xcel Energy maintains this information as a trade secret pursuant to Minn. Rule 7829.0500.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached miscellaneous service list.

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

Sincerely,

/s/

AMY LIBERKOWSKI  
DIRECTOR, REGULATORY PRICING AND PLANNING

Enclosures  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie J. Sieben	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY  
FOR APPROVAL OF A PLAN FOR  
TREATMENT OF COSTS RELATED TO  
SOLAR ENERGY STANDARD CUSTOMER  
EXCLUSIONS

DOCKET NO. E002/M-17-\_\_\_

**PETITION**

**OVERVIEW**

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Petition for approval of a plan for treatment of costs related to Solar Energy Standard (SES) customer exclusions. In this Petition we propose:

- a method of calculating individual customer costs related to compliance with the SES;
- a method of crediting those costs back to solar excluded customers; and
- a method of recovering the solar excluded costs from all customers.

In developing a solar cost exclusion plan, our goal was to meet the requirements of the SES statute and equitably account for solar excluded costs while being as administratively simple and transparent as possible. We believe our proposed plan meets those goals as well as a standard of reasonableness despite the practical limitations inherent in a process that excludes only certain costs from a small subset of customers. We believe this proposal is reasonable because:

- *It is equitable.* Solar excluded costs will be calculated separately for each rider mechanism through which those costs are incurred for a more accurate calculation. Those costs will be recovered through each respective rider in the amount equal to each rider's excluded costs. Since the solar costs were rider-specific, it is an equitable approach to true-up the excluded cost refunds as part

of each rider's true-up mechanism. The process will prevent inequity in that customers who are exempted from CIP costs, for example, will not be charged for solar CIP costs.

- *It is as administratively simple as possible.* An annual approach to excluding costs is appropriate given the relatively few customers seeking exclusion.
- *It is transparent.* Calculating solar excluded costs based on actual costs in the prior year will more clearly tie to the tracker of actual costs in rider filings than a forecast methodology.
- *It complies with the statute.* The proposed credit process meets the statutory requirement of not allowing solar costs to be charged to solar excluded customers.

We respectfully request Commission approval of this proposed SES cost exclusion plan.

## **I. SUMMARY OF FILING**

Pursuant to Minn. Rule 7829.1300, Subp. 1, a one paragraph summary of our filing accompanies this Petition.

## **II. SERVICE ON OTHER PARTIES**

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Commission, and copies of the summary have been served on the parties on the attached service lists.

## **III. GENERAL FILING INFORMATION**

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

### **A. Name, Address, and Telephone Number of Utility**

Northern States Power Company, doing business as:  
Xcel Energy  
414 Nicollet Mall  
Minneapolis, MN 55401  
(612) 330-5500

### **B. Name, Address, and Telephone Number of Utility Attorney**

James R. Denniston  
Assistant General Counsel

Xcel Energy  
414 Nicollet Mall, 401 - 8<sup>th</sup> Floor  
Minneapolis, MN 55401  
(612) 215-4656

**C. Date of Filing and Proposed Implementation Date**

The date of this filing is May 26, 2017. We will begin implementing the process upon Commission approval.

**D. Statutes Controlling Schedule for Processing the Filing**

Since no determination of Xcel Energy’s general revenue requirement is necessary, this filing falls within the definition of a “miscellaneous filing” under Minn. Rule 7829.0100, Subp. 11. Pursuant to Minn. Rule 7829.1400, initial comments on a miscellaneous filing are due within 30 days of filing, with replies due 10 days thereafter.

**E. Utility Employee Responsible for Filing**

Amy Liberkowski  
Director, Regulatory Pricing and Analysis  
Xcel Energy  
414 Nicollet Mall, 401 - 7<sup>th</sup> Floor  
Minneapolis, MN 55401  
(612) 330-6613

**IV. MISCELLANEOUS INFORMATION**

The Company will serve a copy of the Petition summary on those persons on the electric utility general service list. Pursuant to Minn. Rule 7829.0700, we request that the following persons be placed on the Commission’s official service list for this matter:

James R. Denniston  
Assistant General Counsel  
Xcel Energy  
414 Nicollet Mall, 401 - 8<sup>th</sup> Floor  
Minneapolis, MN 55401  
[james.r.denniston@xcelenergy.com](mailto:james.r.denniston@xcelenergy.com)

Carl Cronin  
Regulatory Administrator  
Xcel Energy  
414 Nicollet Mall, 401 - 7<sup>th</sup> Floor  
Minneapolis, MN 55401  
[regulatory.records@xcelenergy.com](mailto:regulatory.records@xcelenergy.com)

Any information requests in this proceeding should be submitted to Mr. Cronin at the Regulatory Records email address above.

## **V. DESCRIPTION AND PURPOSE OF FILING**

### **A. Background**

Minn. Stat. § 216B.1691 subd. 2f sets forth the requirements of the SES, including its requirement that by the end of 2020, at least 1.5 percent of a public utility's total retail electric sales must be generated by solar energy, and that at least 10 percent of the 1.5 percent must be met by solar photovoltaic (PV) devices of 20 kW or less. The law excludes certain customers from the sales base for calculating the utility's SES obligation and from the costs of satisfying the SES.

On January 2, 2015, the Company submitted a compliance filing in Docket No. E999/CI-13-542 which outlined how we would identify customers eligible for solar exclusion and we proposed a process for managing solar excluded customer applications. We further refined the process in our February 20, 2015 Reply Comments and our September 1, 2015 Supplemental filing. On January 29, 2016, the Commission issued a notice approving the customer exclusion notification and application process as supplemented. We subsequently implemented our notification plan. At this time, two customers have submitted applications for solar cost exclusion, and those applications have now been approved. Neither customer submitted the application prior to March 1, 2016 for inclusion in the June 1, 2016 SES Annual Report. Thus, per our approved exclusion process, we will officially notify the Commission of the approved status of those customers in our June 1, 2017 SES Annual Report.

We now seek approval for the calculation of solar excluded customers' costs, the method by which those costs will be credited to solar excluded customers, and the method of recovery of the excluded solar costs. We outline our proposal below.

### **B. Specific Request**

Three primary approaches were considered for the SES cost exclusion process: excluding the solar costs from each rider rate; establishing a wholly new rider; and crediting back the aggregate value. We opted for the latter approach as it is practical, equitable, transparent, and consistent with the rate case settlement. The Company carefully considered how best to fulfill the solar exclusion provisions of the SES Statute, and we believe our plan fulfills the spirit of the statute. Minn. Stat. § 216B.1691 subd. 2f states, in part:

Those [solar excluded] customers may not have included in the rates charged to them by the public utility any costs of satisfying the solar standard specified by this subdivision.

Under our proposal, solar costs will be credited back to customers rather than being “excluded” at the time they are incurred. We believe this plan is sufficient to comply with the provision that “customers may not have included in the rates charged to them.” As discussed below, solar costs are included in three different rider mechanisms that each function in different ways. Short of creating a separate solar excluded customer rate for each of the three riders for monthly billing to a small number of customers, we do not see a practical way to exclude solar costs at the time those customers are billed. An annual credit process achieves the same outcome of making sure solar excluded customers do not ultimately pay for solar costs relating to the SES. This approach is simpler to administer, especially given the small number of customers who have so far requested exclusion.

#### *1. Excluded Cost Calculation*

Compliance with the SES Statute is achieved through the retirement of S-RECs. The Company acquires S-RECs through a variety of solar projects with which the Company has authority to retain the S-RECs. Costs associated with acquiring S-RECs are a component of several different rider rates. The costs in each rider vary based on the project capacity and the program through which those costs are incurred. As a result, the calculation of incremental solar costs needs to be treated separately for each solar program and cost recovery mechanism. Quantifying the solar costs separately by each program and then calculating a factor separately for each impacted rider is transparent and equitable to customers.

Incremental solar costs attributable to the SES are included within the following programs and riders for projects completed after August 1, 2013:

- Fuel Clause Adjustment (FCA):
  - Solar\*Rewards Community program for projects where the Company owns the Renewable Energy Credits (RECs).
  - Solar Power Purchase Agreements (PPAs) for the energy the Company purchases, but excluding Renewable\*Connect PPAs. (This includes utility-scale solar PPA projects as well as smaller PPA projects that are part of the RDF program.)

- Renewable Development Fund (RDF)<sup>1</sup>:
  - Solar\*Rewards incentive through the RDF for rooftop solar projects.
  - Made in Minnesota incentives for rooftop solar projects (80% funded by RDF).
  - Development grant funds issued for projects where Xcel Energy owns the RECs.
  - Renewable Energy Production Incentives (REPI) for projects where Xcel Energy owns the RECs.
- Conservation Improvement Program (CIP):
  - Made in Minnesota incentives for rooftop solar projects (20% funded by CIP).

Attachment 1 presents an illustrative example showing one year's solar excluded cost calculation that includes all of the above components. Below, we describe each component of the calculation in more detail.

a. FCA

The Commission's September 17, 2014 Order in our Solar\*Rewards Community Program<sup>2</sup> authorizes recovery of certain costs associated with this program through the Fuel Clause Adjustment Rider. The costs include customer bill credits, Renewable Energy Certificates (RECs) payments, and unsubscribed energy payments. The Commission has also authorized recovery through the FCA of costs related to several solar PPAs in their respective PPA approval dockets.<sup>3</sup>

In order to credit to solar excluded customers the incremental solar costs charged through the FCA, the solar PPAs and projects will be isolated and the costs net of avoided energy costs will be divided by the total FCA system sales to calculate the solar rate. This rate will be multiplied by the solar excluded customer's sales to arrive at the individual customer's FCA refund amount. See Attachment 2 for an illustrative example of incremental solar costs isolated in the FCA Rider for 2016. We note that no customer credits will be issued based on these example calculations.

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<sup>1</sup> We acknowledge that pending legislation may impact the solar cost components currently recovered through the RDF Rider.

<sup>2</sup> Docket No. E002/M-13-867

<sup>3</sup> Aurora, Docket No. E002/M-15-330, Order dated August 2, 2015; Marshall and North Star, Docket No. E002/M-14-162, Order dated March 24, 2015; Slayton Solar, Docket No. E002/M-11-490, Order dated September 14, 2011; St. John's Solar, Docket No. E002/M-09-1481, Order dated June 25, 2010; School Sisters, Docket No. E002/M-15-619, Order dated September 14, 2015.



b. RDF<sup>4</sup>

There are expenses related to three legislative mandates recovered through the RDF that contain solely solar costs that meet the SES Statute. The largest is the Made in Minnesota Solar Energy Production Incentive Account established by Minn. Stat. §216C.412, Subd. 1, which is a separate account in the special revenue fund in the state treasury. Minn. Stat. §216C.412, Subd. 2a specifies that for a total of ten years, beginning January 1, 2014 and each January 1 through to 2023, large public electric utilities subject to Minn. Stat. §216B.241 and 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 Department of Commerce in an amount that, when added to the amount paid by the large public electric utilities, totals \$15,000,000 annually. Approximately 80 percent of Xcel Energy's portion of Made in Minnesota costs are paid from the RDF and this 80 percent is collected from customers through the RDF Rider.

The second legislatively mandated component of the RDF that contains solely solar costs that meet the SES Statute is the Minnesota Bonus Solar Rebate Program. Minn. Stat. §116C.7791, Subd. 5. mandates solar rebates, up to \$5.00 per watt of installed capacity for systems up to 40 kW, to be available for installations that use solar modules either manufactured or assembled in Minnesota. The statute appropriated \$21 million from the RDF for this purpose. The Minnesota Bonus rebates are paid to each qualifying customer in five consecutive annual installments. The final installments are forecasted to be paid in 2019.

The third of the legislatively mandated components of the RDF that contains solely solar costs that meet the SES Statute is the Solar\*Rewards Incentive Program. Minn. Stat. §116C.7792 directed the Company to establish a solar energy incentive program to be funded in full by RDF funds, a program that has been named Solar\*Rewards. The program is to provide solar energy production incentives for solar energy systems of no more than a total nameplate capacity of 20 kW DC. The statute specifies that the program shall be operated for five consecutive calendar years commencing in 2014. For each of the five years, \$5,000,000 shall be allocated from the RDF to this program. The production incentive is to be paid over the course of 10 years, commencing with system operation. The final installments are forecasted to be paid in 2029.

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<sup>4</sup> The most recently approved RDF Rider request was approved in the Commission's December 28, 2016 Order in Docket No. E002/M-16-811.

In addition, grant funds are issued through the RDF for certain development projects, some of which are solar projects. Some of these solar development projects result in PPAs between the Company and the project developer. Energy costs of those PPAs are recovered through the FCA, as noted above. For other solar development projects that deliver energy through net-metering, the Company receives the project RECs as agreed to in the project RDF grant agreement. Costs for these projects flow through the RDF Rider.

To calculate the RDF portion of solar excluded costs, the Company will divide the total SES program costs included in the RDF (as described above) by the Minnesota kWh sales. This rate is multiplied by the solar excluded customer's sales to calculate a refund of the solar portion of each customer's RDF charges. See Attachment 3 for an illustrative example of solar excluded costs charged through the RDF Rider for 2016. We note that no customer credits will be issued based on these example calculations.

### c. CIP

Five percent of the Company's minimum CIP spending for the year is required to be paid to the Made in Minnesota Account, so this amount is recovered from customers through the Electric CIP Rider filed annually on April 1. As noted above, approximately 80 percent of Xcel Energy's portion of the Made in Minnesota Account is funded through the RDF, leaving the other 20 percent to be funded through CIP.

To calculate the amount of solar costs in the Electric CIP Rider, the Made in Minnesota spend for the year as reported in the annual CIP tracker is isolated. The Made in Minnesota costs will be divided by the CIP kWh sales. The CIP sales base differs from the total Company sales base because some customers are exempt from the CIP rider. The resulting rate is multiplied by the solar excluded customer's sales to calculate a refund of the solar portion of the customer's CIP charges. See Attachment 4 for an illustrative example of solar costs charged through the CIP Rider for 2016. We note that no customer credits will be issued based on these example calculations.

In the event that a solar excluded customer is CIP-exempt, their bill credit would not include the CIP portion of the solar excluded cost calculation. The two customers who have been approved for exclusion at this time are not CIP-exempt.

Attachments 1 through 4 show an example of the solar excluded cost calculations for each rider using illustrative sales and actual 2016 rider collections. We note that in 2016 no community solar gardens were yet in-service and our three utility-scale solar

projects for which we have PPAs (Marshall, North Star, and Aurora) began operation very late in 2016. There will be more solar projects going online in 2017; therefore, we expect solar excluded costs in 2017 to be significantly greater than our 2016 illustrative example. Since cost exclusion for customers applying for exclusion by March 1, 2017 begins on June 1, 2017, the two approved customers will receive solar excluded cost credits for seven months of 2017.

## *2. Process for Crediting Solar -Excluded Customers*

It is more practical and efficient to credit back to the excluded customers the SES costs that have been billed rather than to exclude the costs from each rate at the time it is billed given the relatively small number of customers eligible for exclusion compared to our total customer base. Though this crediting process will be manual, we do not think it is reasonable at this time to create a solar excluded cost rate for the FCA, RDF and the FCA riders to be applied monthly to each solar excluded customer's bill. An annual credit process achieves the same outcome of ensuring solar excluded customers do not ultimately pay for the costs of SES compliance. We believe a credit of actual costs at the end of the year gives customers a better sense for their total solar costs rather than forecasting costs at the beginning of the year. A forecast methodology would necessitate a true-up, especially as solar production is still ramping up for many of our solar facilities and programs.

Under this proposal, customers would receive a credit or refund annually to be calculated at the end of the year and applied to bills in the month beginning March 1. The solar excluded cost will be manually credited to the solar excluded customers' bills and appear as a separate line item. Solar excluded costs in each of the three riders would be rolled up into a single line item credit called "Annual Solar Exclusion."

## *3. Recovery of Solar Excluded Costs*

We believe it is most equitable to recover the solar excluded costs refunded to exempt customers through each separate rider mechanism where those costs were incurred. When recovered through the separate riders, customers are paying only a small additional portion in each rider for the costs excluded from that same rider. This ensures that CIP-exempt customers, for example, will not be paying any portion of the solar excluded costs in the CIP rider, but will pay for the solar excluded costs only in the RDF and FCA riders.

Annual filings are submitted for both the RDF Rider (October 1) and the CIP Rider (April 1) to true-up the trackers and set new rates. We propose that in each of these

annual rider filings we include an annual true-up adjustment to include the total actual solar excluded cost credit amount issued to solar excluded customers in the prior year. For the FCA Rider, we propose to recover the solar excluded costs annually in the regular fuel clause filing for the month of March (filed at the end of February). This process would begin with rider true-up filings made during 2018 for 2017 solar excluded costs. The lag in cost recovery is similar to the overall cost/revenue true-up currently existing in other tracker mechanisms and should have a small impact on the overall rider true-up at our current levels of exemption.

#### 4. *Exclusion Timing*

As approved in our customer exclusion notification process filings, we require solar excluded customer applications to be submitted by March 1 each year in order to be reviewed by the Company and then included in the June 1 SES Annual Report. All approved solar excluded customers identified in the June 1 Annual Report will be credited solar excluded costs dating from June 1 in conjunction with that filing. In the first year of implementation, for example, the solar excluded customers' credits will be retroactive to June 1, 2017. Credits will be issued for the June 1-December 31, 2017 time period in March 2018. After a customer's first year of solar cost exclusion, their credit will include all months of the prior year.

We plan to issue credits to solar excluded customers for the first time in March 2018 for 2017 solar excluded costs. The FCA, RDF and CIP riders submitted during the 2018 calendar year would then include the solar excluded costs for recovery from our customer base.

#### 5. *Continued Eligibility of Excluded Customers*

Any customer who participates in a solar program that incurs SES costs is ineligible for solar cost exclusion. Similarly, any customer who is excluded from solar costs is ineligible for participation in a solar program that incurs SES-related costs. In particular, solar excluded customers may not participate in our Solar\*Rewards or Solar\*Rewards Community programs, nor do we believe they should be eligible for the Department of Commerce's Made in Minnesota program. In addition to monitoring customers' solar excluded cost eligibility upon receiving their applications for exclusion, the Company intends to audit customers for cross-program participation at the time we issue the bill credits each year.

## 6. Accounting

The Company will continue to record all SES costs in the appropriate FERC accounts for each rider. We will also continue to account for the billing of these costs in the same manner. To account for the solar excluded costs that were refunded to eligible customers, the Company will debit Other Revenues and credit Accounts Receivable. The impact of this transaction will be to reduce billed revenues and increase the amount collectible through the true-up mechanics of each rider. Here is an example of the accounting for the fuel clause:

Incur Cost	Solar PPA (555)	\$100,000	
	Accounts Payable (232)	\$100,000	
Bill Cost	Accounts Receivable (142)	\$100,000	
	Fuel Revenues (44X)	\$100,000	
Cost Excluded	Other Revenues (456)	\$ 1,000	
	Accounts Receivable	\$ 1,000	

### C. Compliance and Reporting

Currently we are required to provide excluded customers' retail sales by premise within the June 1 SES Annual Report. If the Commission would like us to report the customers' total excluded costs for the reporting year, we suggest this information be included in the June 1 report. The Commission Staff's reporting form for the June 1 report includes a tab<sup>5</sup> for reporting the solar excluded customers' retail sales, and we would add a column to show the total excluded costs for each premise. We propose annual adjustments in each of the separate cost recovery mechanisms (FCA Rider, RDF Rider and the CIP Rider) to recover the solar excluded costs. This would appear as a separate line item in the trackers

Attachment 5 includes proposed updates to the following tariff sheets reflecting our plan to recover the solar excluded costs through the FCA, RDF, and CIP riders.

#### **Minnesota Electric Rate Book – MPUC No. 2:**

Sheet No. 5-91, revision 27 (FCA)

Sheet No. 5-92, revision 17 (CIP)

Sheet No. 5-143, revision 18 (RDF)

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<sup>5</sup> Tab 2. Retail and Excl

We do not believe this solar exclusion plan requires an update to any of our solar program tariff sheets.

#### **D. Customer Notice**

All solar excluded customers will receive a letter prior to the issuance of their March bills which will notify them that solar excluded cost credits will be issued for the prior year in the March bill. Attachment 6 is our proposed notification letter.

Solar excluded costs that will be charged back to non-solar excluded customers will be added to the annual tracker true-up filings for the RDF and CIP riders and in the March FCA filing. Since these costs will be one component added to the total costs included in these riders, we do not believe any additional notice to customers is necessary. As noted above, we are proposing to update the rider tariff sheets to reflect the inclusion of these solar excluded costs in the total rider recovery.

#### **E. Limitations of this Exclusion Methodology**

While we believe that our proposed solar cost exclusion plan is administratively the simplest and clearest methodology to meet our customers' needs, we acknowledge that there are some practical limitations. Below we outline the limitations we have identified.

##### *1. De Minimis Chargeback to Solar Excluded Customers Through Riders*

The solar excluded customers are subject to all three riders through which solar costs flow,<sup>6</sup> and therefore the solar excluded customers will be charged a *de minimis* amount through the annual RDF, CIP and FCA riders for their solar excluded costs. In our 2016 example calculations, a total of \$47,072 in solar excluded costs would be charged to the full customer base through the riders. For the RDF rider, where the most SES costs are collected, we estimate the per-customer charge for the solar excluded costs would be less than \$0.000002/kWh for our 2016 example year. We do not believe it is practical to bill each solar excluded customer manually each month for separate rider rates that exclude the solar costs, especially given how small the additional charge will be.

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<sup>6</sup> It is possible that some SES cost excluded customers in the future may be CIP-exempt as noted earlier in this petition.

## 2. *Comparability to Other Utilities' Exclusion Plans*

All utilities subject to the SES are required to exclude qualifying customers who request and are approved for exclusion. We acknowledge that Minnesota Power has submitted a plan that has been approved by the Commission that differs significantly from Xcel Energy's plan discussed above.<sup>7</sup> Xcel Energy is in a different position than Minnesota Power in that we have fewer exclusion-qualifying customers overall, and as noted above, the Settlement Agreement in our currently pending rate case prevents the Company from proposing any new rate rider mechanism for the test period of the multi-year rate plan (2016 through 2019). Given the differing positions of Xcel Energy and Minnesota Power, we believe we have proposed a practical, equitable alternative exclusion methodology that meets the needs of our own customers.

## 3. *Impact of Additional Cost-Excluded Customers*

We believe our outlined manual process is the simplest, most transparent and most equitable approach to solar cost exclusion at this time given the small number of customers who have requested exclusion. However, we acknowledge that a greater number of solar excluded customers may result in diminishing efficiency. We may need to reconsider this plan should the number of solar excluded customers increase. Some of the aspects of the plan that may need to be reconsidered are:

- a forecasted exclusion amount included in rider recovery requests with forecasted test years;
- a forecasted bill credit for excluded customers; and
- an automated billing approach.

We note these limitations to the scaling of this methodology for informational purposes. In the event that number of excluded customers grows, we would request Commission approval of recommended changes to the plan.

## **VI. EFFECT ON XCEL ENERGY REVENUE**

Under this proposal, we will credit solar incremental costs to affected customers who have applied and been approved for exclusion from those costs. We will then charge back to our customer base the same amount of the credit issued. Therefore, there is no impact to the Company's revenue.

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<sup>7</sup> Docket No. E015/M-15-773

We note that since the SES is a Minnesota state mandate, all costs associated with the SES are assigned to our Minnesota jurisdiction and will not be shared with Northern States Power Company – Wisconsin customers through the Interchange Agreement.

### **CONCLUSION**

We respectfully request the Commission's approval of our proposed plan for calculating approved customers' solar excluded costs, how those costs will be credited back to solar excluded customers, and the method by which we will recover the solar excluded costs from customers.

Dated: May 26, 2017

Northern States Power Company



STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie J. Sieben	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY  
FOR APPROVAL OF A PLAN FOR  
TREATMENT OF COSTS RELATED TO  
SOLAR ENERGY STANDARD CUSTOMER  
EXCLUSIONS

DOCKET No. E002/M-17-\_\_\_\_

**PETITION**

**SUMMARY OF FILING**

Please take notice that on May 26, 2017 Northern States Power Company, doing business as Xcel Energy, submitted to the Minnesota Public Utilities Commission a Petition for approval of a plan for treatment of costs related to Solar Energy Standard customer exclusions.

**Solar Energy Standard Exemption Methodology – Illustrative Example Summary**

Line		2016	Refund			
		Sales (kWh)	Total All Riders	RDF	CIP	FCA
[1]	MN Solar Costs Included in Rider			\$ 25,632,625	\$ 2,627,620	\$570,457
[2]	System Sales KWh (000s)			30,689,986 <sup>1</sup>	28,491,881 <sup>2</sup>	41,114,706 <sup>3</sup>
[3]	Rider Solar Costs per kWh [3] = [1] / [2]			\$ 0.000835	\$ 0.000092	\$ 0.000014
[4]	Example Exempt Customer kWh Sales	50,000,000		50,000,000	50,000,000	50,000,000
[5]	Example Exempt Customer Solar Refund [5] = [3] x [4]		<u>\$ 47,065</u>	<u>\$ 41,761</u>	<u>\$ 4,611</u>	<u>\$ 694</u>

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

**Determination of FCA Costs Eligible for Solar Energy Standard Exemption – Illustrative example**

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Description	Source	2016 Costs
		<b>[PROTECTED DATA BEGINS</b>
Best Power International LLC	Included in FCA	
School Sisters of Notre Dame Solar Park	Included in FCA	
NorthStar Solar	Included in FCA	
Aurora	Included in FCA	
Marshall Solar	Included in FCA	
		<b>PROTECTED DATA ENDS]</b>
Community Solar Gardens	Included in FCA	\$ 68,046
<b>Total SES Related FCA Costs</b>	<b>Total from above</b>	<b>\$ 570,457</b>

## **Determination of RDF costs Eligible for Solar Energy Standard Exemption – Illustrative example**

<b>Description</b>	<b>Source</b>	<b>2016 Costs</b>
Renewable Energy Production Incentives	RDF Filing Docket 15-730	\$ 1,302,211
Minnesota Bonus Solar Rebate Program	RDF Filing Docket 15-730	\$ 3,817,458
Made in Minnesota Solar Energy Production Incentive Account	RDF Filing Docket 15-730	\$ 12,014,672
Solar Energy Incentive Program	RDF Filing Docket 15-730	\$ 942,193
Research and Development Grants	RDF Filing Docket 15-730	\$ 2,886,482
Category A Projects - EP		
Total SES Related RDF Costs		\$ 20,963,016
Total RDF Costs	RDF Filing Docket 15-730	\$ 27,678,944
Prior Year True-up - Under (Over) Recovery	RDF Filing Docket 15-730	4,669,609
Prior Year % SES	RDF Filing Docket 14-814	100%
SES Related RDF True-up Costs		\$ 4,669,609
<b>Total SES Solar Costs w/ True-up</b>		<b>\$ 25,632,625</b>

## **Determination of CIP Costs Eligible for Solar Energy Standard Exemption – Illustrative example**

<b>Description</b>	<b>Source</b>	<b>2016 Costs</b>
Made in Minnesota Solar Energy Production Incentive Account	CIP 2017-2019 Triennial filing 16-115	\$ 2,627,620
Total SES Related CIP Costs		\$ 2,627,620
Total CIP costs	CIP 2017-2019 Triennial filing 16-115	\$ 101,146,305
Total Sales Evaluation Year	CIP 2016 Status Report 12-447	28,491,881 MWh

**Redline**

**MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2**

**FUEL CLAUSE RIDER**

Section No. 5  
~~26th~~<sup>27th</sup> Revised Sheet No. 91

**FUEL CLAUSE CHARGE**

There shall be added to or deducted from the monthly bill a Fuel Cost Charge calculated by multiplying the applicable monthly billing kilowatt hours (kWh) by the billed Fuel Adjustment Factor (FAF) per kWh. The billed FAF is calculated by prorating each calendar month FAF by the number of customer billing days in each calendar month, and rounding to the nearest \$0.00001 per kWh.

**EXEMPTION**

For customers participating in Company's Renewable\*Connect and Renewable\*Connect Government pilot programs, or the Windsource® Program under the Voluntary Renewable and High-Efficiency Energy Purchase Rider, the applicable billing kWh subject to the FAF shall be reduced by the elected Voluntary Renewable Adjustment energy blocks.

In the event that a customer's metered energy use is lower than the subscribed energy blocks, the applicable billing kWh for the FAF for that month is zero.

For customer premises recognized by the Company as not being subject to any of the costs of satisfying the solar energy standard under Minn. Stat. § 216B.1691, subd. 2f ("SES Costs"), the SES Costs reflected in the Fuel Clause Charge assessed to the accounts associated with these premises may be credited to these accounts, and the dollar amount of these credits shall be added back into the Current Period Cost of Energy applicable to the time period when the credit is issued.

**FUEL ADJUSTMENT FACTOR (FAF)**

A separate FAF will be determined for each service category defined by customer class and time-of-day (TOD) period within the Commercial and Industrial – Demand class. The FAF for each service category is the sum of the Current Period Cost of Energy multiplied by the applicable FAF Ratio, and the applicable Energy Cost True-up Factor. The FAF Ratio is the Class Cost Ratio multiplied by the corresponding TOD Ratio:

Service Category	Class Cost Ratio	TOD Ratio	FAF Ratio
Residential	1.0185	1.0000	1.0185
C&I Non-Demand	1.0493	1.0000	1.0493
C&I Demand	0.9922	1.0107	1.0028
C&I Demand TOD On-Peak	0.9922	1.2832	1.2732
C&I Demand TOD Off-Peak	0.9922	0.8050	0.7987
Outdoor Lighting	0.7446	1.0000	0.7446

**BASE COST OF ENERGY**

The System Base Cost of Energy is \$0.02680 per kWh. The FAF for each service category includes a Base Cost of Energy, which is the System Base Cost of Energy multiplied by the applicable FAF Ratio.

Service Category	Base Cost of Energy
Residential	\$0.02730
C&I Non-Demand	\$0.02812
C&I Demand Non-TOD	\$0.02688
C&I Demand TOD On-Peak	\$0.03412
C&I Demand TOD Off-Peak	\$0.02141

(Continued on Sheet No. 5-91.1)

Date Filed: ~~03-09-17~~<sup>05-26-17</sup> By: Christopher B. Clark Effective Date: ~~02-27-17~~  
 President, Northern States Power Company, a Minnesota corporation  
 Docket No. E002/M-~~15-98517-~~ Order Date: ~~02-27-17~~

**MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2**

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**FUEL CLAUSE RIDER**

Section No. 5  
~~26th~~27th Revised Sheet No. 91

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Outdoor Lighting \$0.01996

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(Continued on Sheet No. 5-91.1)

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Date Filed: ~~03-09-17~~05-26-17 By: Christopher B. Clark Effective Date: ~~02-27-17~~  
President, Northern States Power Company, a Minnesota corporation  
Docket No. E002/M-~~15-98517-~~ Order Date: ~~02-27-17~~



**MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2**

**CONSERVATION IMPROVEMENT PROGRAM  
ADJUSTMENT RIDER (Continued)**

Section No. 5  
~~5th~~<sup>6th</sup> Revised Sheet No. 92.1

**DETERMINATION OF CONSERVATION COST RECOVERY CHARGE (CCRC)**

The CCRC is the amount included in base rates dedicated to the recovery of CIP costs as approved by the Minnesota Public Utilities Commission (or successor agency) in the Company's last general rate case. The CCRC is approved and applied on a per kWh basis by dividing the test-year CIP expenses by the test-year sales volumes (net of CIP-exempt volumes). All revenues received from the CCRC shall be credited to the CIP Tracker Account. The CCRC for all rate schedules is:

All Classes \$0.003130 per kWh

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**DETERMINATION OF CCRC EXEMPTION ADJUSTMENT FACTOR**

For "Large Customer Facilities", as defined in Minn. Stat. 216B.241 subd. 1, granted exemption by the Commissioner of the Minnesota Department of Commerce, Division of Energy Resources, pursuant to Minn. Stat. 216B.241, the CIP Adjustment Factor shall not apply and monthly bills will include a CCRC Exemption Adjustment credit determined by multiplying total billing kWh by the applicable CCRC Exemption Adjustment Factor. Customers' accounts granted exemption by a decision of the Commissioner after the beginning of a calendar year shall be credited for any CIP collections billed after January 1st of the year following the Commissioner's decision. The CCRC Exemption Adjustment Factor for all rate classes is:

All Classes \$0.003130 per kWh

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**PROVISION OF FORECAST DATA**

To assist commercial and industrial customers in budgeting and managing their energy costs, the Company will annually make available on April 1<sup>st</sup> a 24-month forecast of the CIP Adjustment Factor applicable to demand billed C&I customers under this Rider. The forecast period begins January 1<sup>st</sup> of the following year.

**EXEMPTION**

For customer premises recognized by the Company as not being subject to any of the costs of satisfying the solar energy standard under Minn. Stat. § 216B.1691, subd. 2f ("SES Costs"), the SES Costs reflected in the CIP Adjustment assessed to the accounts associated with these premises may be credited to these accounts, and the dollar amount of these credits shall be added as part of the Recoverable Conservation Improvement Program Expense applicable to the time period when the credit is issued.

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Date Filed: ~~11-04-13~~<sup>05-26-17</sup> By: Christopher B. Clark Effective Date: ~~11-01-15~~  
President, Northern States Power Company, a Minnesota corporation  
Docket No. E002/~~GR-13-868M-17-~~ Order Date: ~~08-31-15~~

**MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2**

**RENEWABLE DEVELOPMENT FUND RIDER**

Section No. 5

~~17th~~18th Revised Sheet No. 143

**APPLICATION**

Applicable to bills for electric service provided under the Company's retail rate schedules.

**RIDER**

There shall be included on each customer's monthly bill a Renewable Development Fund charge that shall be the applicable Renewable Development Fund factor multiplied by the customer's monthly kWh electric consumption.

**DETERMINATION OF RENEWABLE DEVELOPMENT FUND FACTOR**

The applicable Renewable Development Fund factor shall be the quotient obtained by dividing the annual Renewable Development Fund Tracker amount by the annual forecasted kWh sales. The factor may be adjusted annually with approval of the Minnesota Public Utilities Commission.

Residential	\$0.001034 per kWh
Commercial	\$0.001034 per kWh

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Recoverable Renewable Development Fund Expense

All costs appropriately charged to the Renewable Development Fund Tracker account shall be eligible for recovery through this Rider, and all revenues received from the Renewable Development Fund portion of the Resource Adjustment shall be credited to the Renewable Development Fund Tracker account.

**PROVISION OF FORECAST DATA**

To assist commercial and industrial customers in budgeting and managing their energy costs, the Company will annually make available on October 1<sup>st</sup> a 24-month forecast of the Renewable Development Fund Factor applicable to demand billed C&I customers under this Rider. The forecast period begins January 1<sup>st</sup> of the following year. This forecast will be provided only to customers who have signed a protective agreement with the Company.

**EXEMPTION**

For customer premises recognized by the Company as not being subject to any of the costs of satisfying the solar energy standard under Minn. Stat. § 216B.1691, subd. 2f ("SES Costs"), the SES Costs reflected in the Renewable Development Fund charge assessed to the accounts associated with these premises may be credited to these accounts, and the dollar amount of these credits shall be added as part of the annual Renewable Development Fund Tracker applicable to the time period when the credit is issued.

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Date Filed:	<del>09-30-16</del> <u>05-26-17</u>	By: Christopher B. Clark	Effective Date:	<del>01-01-17</del>
		President, Northern States Power Company, a Minnesota corporation		
Docket No.	E002/M- <del>46-811-17-</del>		Order Date:	<del>12-28-16</del>

**Clean**

**MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2**

**FUEL CLAUSE RIDER**

Section No. 5  
 27th Revised Sheet No. 91

**FUEL CLAUSE CHARGE**

There shall be added to or deducted from the monthly bill a Fuel Cost Charge calculated by multiplying the applicable monthly billing kilowatt hours (kWh) by the billed Fuel Adjustment Factor (FAF) per kWh. The billed FAF is calculated by prorating each calendar month FAF by the number of customer billing days in each calendar month, and rounding to the nearest \$0.00001 per kWh.

**EXEMPTION**

For customers participating in Company's Renewable\*Connect and Renewable\*Connect Government pilot programs, or the Windsource® Program under the Voluntary Renewable and High-Efficiency Energy Purchase Rider, the applicable billing kWh subject to the FAF shall be reduced by the elected Voluntary Renewable Adjustment energy blocks. In the event that a customer's metered energy use is lower than the subscribed energy blocks, the applicable billing kWh for the FAF for that month is zero.

For customer premises recognized by the Company as not being subject to any of the costs of satisfying the solar energy standard under Minn. Stat. § 216B.1691, subd. 2f ("SES Costs"), the SES Costs reflected in the Fuel Clause Charge assessed to the accounts associated with these premises may be credited to these accounts, and the dollar amount of these credits shall be added back into the Current Period Cost of Energy applicable to the time period when the credit is issued.

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**FUEL ADJUSTMENT FACTOR (FAF)**

A separate FAF will be determined for each service category defined by customer class and time-of-day (TOD) period within the Commercial and Industrial – Demand class. The FAF for each service category is the sum of the Current Period Cost of Energy multiplied by the applicable FAF Ratio, and the applicable Energy Cost True-up Factor. The FAF Ratio is the Class Cost Ratio multiplied by the corresponding TOD Ratio:

Service Category	Class Cost Ratio	TOD Ratio	FAF Ratio
Residential	1.0185	1.0000	1.0185
C&I Non-Demand	1.0493	1.0000	1.0493
C&I Demand	0.9922	1.0107	1.0028
C&I Demand TOD On-Peak	0.9922	1.2832	1.2732
C&I Demand TOD Off-Peak	0.9922	0.8050	0.7987
Outdoor Lighting	0.7446	1.0000	0.7446

**BASE COST OF ENERGY**

The System Base Cost of Energy is \$0.02680 per kWh. The FAF for each service category includes a Base Cost of Energy, which is the System Base Cost of Energy multiplied by the applicable FAF Ratio.

Service Category	Base Cost of Energy
Residential	\$0.02730
C&I Non-Demand	\$0.02812
C&I Demand Non-TOD	\$0.02688
C&I Demand TOD On-Peak	\$0.03412
C&I Demand TOD Off-Peak	\$0.02141
Outdoor Lighting	\$0.01996

(Continued on Sheet No. 5-91.1)

**MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2**

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**CONSERVATION IMPROVEMENT PROGRAM  
ADJUSTMENT RIDER (Continued)**

Section No. 5  
6th Revised Sheet No. 92.1

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**DETERMINATION OF CONSERVATION COST RECOVERY CHARGE (CCRC)**

The CCRC is the amount included in base rates dedicated to the recovery of CIP costs as approved by the Minnesota Public Utilities Commission (or successor agency) in the Company's last general rate case. The CCRC is approved and applied on a per kWh basis by dividing the test-year CIP expenses by the test-year sales volumes (net of CIP-exempt volumes). All revenues received from the CCRC shall be credited to the CIP Tracker Account. The CCRC for all rate schedules is:

All Classes \$0.003130 per kWh

**DETERMINATION OF CCRC EXEMPTION ADJUSTMENT FACTOR**

For "Large Customer Facilities", as defined in Minn. Stat. 216B.241 subd. 1, granted exemption by the Commissioner of the Minnesota Department of Commerce, Division of Energy Resources, pursuant to Minn. Stat. 216B.241, the CIP Adjustment Factor shall not apply and monthly bills will include a CCRC Exemption Adjustment credit determined by multiplying total billing kWh by the applicable CCRC Exemption Adjustment Factor. Customers' accounts granted exemption by a decision of the Commissioner after the beginning of a calendar year shall be credited for any CIP collections billed after January 1st of the year following the Commissioner's decision. The CCRC Exemption Adjustment Factor for all rate classes is:

All Classes \$0.003130 per kWh

**PROVISION OF FORECAST DATA**

To assist commercial and industrial customers in budgeting and managing their energy costs, the Company will annually make available on April 1<sup>st</sup> a 24-month forecast of the CIP Adjustment Factor applicable to demand billed C&I customers under this Rider. The forecast period begins January 1<sup>st</sup> of the following year.

**EXEMPTION**

For customer premises recognized by the Company as not being subject to any of the costs of satisfying the solar energy standard under Minn. Stat. § 216B.1691, subd. 2f ("SES Costs"), the SES Costs reflected in the CIP Adjustment assessed to the accounts associated with these premises may be credited to these accounts, and the dollar amount of these credits shall be added as part of the Recoverable Conservation Improvement Program Expense applicable to the time period when the credit is issued.

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**MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2**

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**RENEWABLE DEVELOPMENT FUND RIDER**

Section No. 5  
18th Revised Sheet No. 143

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**APPLICATION**

Applicable to bills for electric service provided under the Company's retail rate schedules.

**RIDER**

There shall be included on each customer's monthly bill a Renewable Development Fund charge that shall be the applicable Renewable Development Fund factor multiplied by the customer's monthly kWh electric consumption.

**DETERMINATION OF RENEWABLE DEVELOPMENT FUND FACTOR**

The applicable Renewable Development Fund factor shall be the quotient obtained by dividing the annual Renewable Development Fund Tracker amount by the annual forecasted kWh sales. The factor may be adjusted annually with approval of the Minnesota Public Utilities Commission.

Residential	\$0.001034 per kWh
Commercial	\$0.001034 per kWh

Recoverable Renewable Development Fund Expense

All costs appropriately charged to the Renewable Development Fund Tracker account shall be eligible for recovery through this Rider, and all revenues received from the Renewable Development Fund portion of the Resource Adjustment shall be credited to the Renewable Development Fund Tracker account.

**PROVISION OF FORECAST DATA**

To assist commercial and industrial customers in budgeting and managing their energy costs, the Company will annually make available on October 1<sup>st</sup> a 24-month forecast of the Renewable Development Fund Factor applicable to demand billed C&I customers under this Rider. The forecast period begins January 1<sup>st</sup> of the following year. This forecast will be provided only to customers who have signed a protective agreement with the Company.

**EXEMPTION**

For customer premises recognized by the Company as not being subject to any of the costs of satisfying the solar energy standard under Minn. Stat. § 216B.1691, subd. 2f ("SES Costs"), the SES Costs reflected in the Renewable Development Fund charge assessed to the accounts associated with these premises may be credited to these accounts, and the dollar amount of these credits shall be added as part of the annual Renewable Development Fund Tracker applicable to the time period when the credit is issued.

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Date Filed: 05-26-17

By: Christopher B. Clark

Effective Date:

President, Northern States Power Company, a Minnesota corporation

Docket No. E002/M-17-

Order Date:



P.O. Box 8  
Eau Claire, WI 54702-0008

February 2018

Account Number:

Service Address:

Dear Customer:

In 2013, Minnesota legislators voted to add solar energy requirements to the state's renewable energy standard, requiring Minnesota utilities to have 1.5 percent solar energy on their systems by 2020. Xcel Energy is on track to achieve these requirements through large scale solar facilities and through our customer programs such as Solar\*Rewards® and Solar\*Rewards® Community®.

The same state law also allows commercial and industrial customer facilities involved in iron mining, forestry product manufacturing and certain other industrial activity to be excluded from paying for the incremental costs utilities incurred to meet this solar energy standard. Your application for exclusion from these costs has been approved.

We have calculated the amount of solar energy standard-related costs incurred by your company in 2017 for all qualified premises.<sup>1</sup> Your March bill will include a credit of \$[insert amount] to compensate you for the solar energy standard-related costs you incurred in 2017.

If you have any questions, please call our Business Solutions Center at 1-800-481-4700.

Sincerely,

Business Solutions Center  
Xcel Energy

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<sup>1</sup> Exclusion of your 2017 solar costs began on June 1, 2017 in compliance with Xcel Energy's approved exclusion process. Beginning in 2018, your excluded solar costs will include the full year of costs.

## CERTIFICATE OF SERVICE

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

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

xx electronic filing

**DOCKET NO. E002/M-17-\_\_\_\_**  
**MISCELLANEOUS ELECTRIC**

Dated this 26<sup>th</sup> day of May 2017

/s/

---

Lynnette Sweet  
Regulatory Administrator



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street  Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Ryan	Barlow	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, Minnesota 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	150 South Fifth Street, Suite 2300  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
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	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Jeanne	Cochran	Jeanne.Cochran@state.mn.us	Office of Administrative Hearings	P.O. Box 64620  St. Paul, MN 55164-0620	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Corey	Conover	corey.conover@minneapolismn.gov	Minneapolis City Attorney	350 S. Fifth Street City Hall, Room 210 Minneapolis, MN 554022453	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Joseph	Dammel	joseph.dammel@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	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service 1400	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Ian	Dobson	Residential.Utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
John	Farrell	jfarrell@ilsr.org	Institute for Local Self- Reliance	1313 5th St SE #303  Minneapolis, MN 55414	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Stephen	Fogel	Stephen.E.Fogel@XcelEnergy.com	Xcel Energy Services, Inc.	816 Congress Ave, Suite 1650  Austin, TX 78701	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Karen	Gados	karen@mysunshare.com	SunShare, LLC	1441 18th Street Suite 400 Denver, CO 80202	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue  St. Paul, MN 55130	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Julia	Jazyuka	jjazyuka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East  Washington, DC 20001	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street  St. Paul, MN 551012134	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Hudson	Kingston	hkingston@mncenter.org	MN Center for Environmental Advocacy	26 East Exchange Street, Suite 206  St. Paul, Minnesota 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Paula	Maccabee	Pmaccabee@justchangela w.com	Just Change Law Offices	1961 Selby Ave  Saint Paul, MN 55104	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric

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	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
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	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
Jeff	Oxley	jeff.oxley@state.mn.us	Office of Administrative Hearings	600 North Robert Street  St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric
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