



414 Nicollet Mall
Minneapolis, MN 55401

October 15, 2020

—Via Electronic Filing—

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

RE: REPLY COMMENTS
PANDEMIC AND CIVIL UNREST RECOVERY PROGRAM
DOCKET NO. E002/M-20-662

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this brief reply in response to the September 14, 2020 Comments of the Office of Attorney General-Residential Utilities Division (OAG) and the October 1, 2020 Comments of the Minnesota Department of Commerce (Department) in the above-referenced docket.

We appreciate the reviews of the OAG and the Department of our August 14, 2020 Petition and the Department's recommendation of approval. As stated by the OAG, "[t]he Company's current proposal would provide much-needed relief to smaller businesses, such as restaurants, small retail shops, grocery and convenience stores, pharmacies, printers and small manufacturers, who were left out of the BIS Rider relief program because of its minimum demand threshold. It will also benefit Xcel by helping the utility retain these customers that are facing financial distress."¹

Despite this recognition, the OAG recommends the Commission impose a condition on cost recovery for this required program, stating "the Commission should require Xcel to track both costs and revenues related to this program so that any proposed recovery of deferred costs can be offset by the corresponding benefits accruing for the same period."² The Company respectfully disagrees with the appropriateness of the proposed condition.

¹ Comments of OAG, September 14, 2020, at page 2.

² *Id.*

The Company's program was proposed in response to a Commission Order.³ Given that the Company brings the program forward in compliance with this Order, it is unreasonable to hold the Company at risk as the OAG proposes. The Company seeks approval to defer the costs of the customer relief credits in this program to its next rate case, and the Company does not believe any additional conditions are warranted.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Holly Hinman at Holly.R.Hinman@xcelenergy.com or (612) 330-5941, or Lisa Peterson at Lisa.R.Peterson@xcelenergy.com or (612) 330-7681 if you have any questions regarding this filing.

Sincerely,

/s/

AMY LIBERKOWSKI
DIRECTOR, REGULATORY PRICING AND ANALYSIS

Enclosures
c: Service Lists

³ *In the Matter of the Petition of Northern States Power Company for Approval of Revisions to the Business Incentive and Sustainability (BIS) Rider Tariff*, Docket No. E002/M-20-436. "By August 14, 2020, Xcel shall file a proposal designed to provide relief for commercial and industrial customers that had peak monthly loads of less than 100 kW before the COVID-19 pandemic."

CERTIFICATE OF SERVICE

I, Paget Pengelly, hereby certify that I have this day served copies or summaries 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-20-662

Dated this 15th day of October 2020

/s/

Paget Pengelly
Regulatory Administrator

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