

**STATE OF MINNESOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION**

Nancy Lange	Chair
Dan Lipschultz	Vice Chair
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

In the Matter of Xcel’s Residential Time of  
Use Rate Design Pilot Program

E002 / M-17-775

In the Matter of Xcel’s 2017 Biennial  
Distribution Grid Modernization Report

E002 / M-17-776

**REPLY COMMENTS OF THE OFFICE  
OF THE ATTORNEY GENERAL**

The Office of the Attorney General – Residential Utilities and Antitrust Division (“OAG”) respectfully submits these Reply Comments regarding the proposal of Northern States Power Company d/b/a Xcel Energy (“Xcel” or “the Company”) to establish a residential Time of Use (“TOU”) pilot program, and Biennial Grid Modernization Report. The OAG files these comments in both dockets because parties have addressed the question of certification for the TOU pilot in both proceedings

Regarding the TOU pilot, the OAG appreciates the thoughtful comments provided by other parties, and provides these Reply Comments to identify areas in which the OAG agrees with issues raised by others. Regarding the question of certification for the TOU pilot, the OAG states its support for the Department’s recommendation on limiting certification to those costs that are permitted by statute.

**I. THE REPORTING REQUIREMENTS PROPOSED BY OTHER PARTIES ARE REASONABLE.**

Several other parties, like the OAG, suggested that Xcel provide certain types of information in its mid-pilot and final reports. The OAG agrees that, in combination with the

information it requested in its Initial Comments, the list of information CUB proposes would be useful for Xcel to provide in its future reports.<sup>1</sup> The OAG also agrees with the Department that Xcel should provide more information about the metrics it proposes to use, and how it believes those metrics should be applied.<sup>2</sup>

## **II. FRESH ENERGY'S ALTERNATIVE ON-PEAK PERIOD IS WORTH CONSIDERING.**

In its Comments, Fresh Energy and the Minnesota Center for Environmental Advocacy (“Fresh”) propose an alternative on-peak period. At the outset, it is important to note that the OAG would support both the on-peak period proposed by Xcel, and the alternative proposed by Fresh. Either proposal would result in a TOU pilot that would lead to valuable information and be beneficial for customers.

Fresh proposes an alternative on-peak period from 2 p.m. to 6 p.m., rather than Xcel's proposed period of 3 p.m. to 8 p.m. After reviewing Fresh's suggestion, the OAG requested that Xcel apply the cost duration method described in its Petition to calculate prices for Fresh's proposal. Xcel provided the following calculation in response:<sup>3</sup>

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<sup>1</sup> CUB Comments at 3–4.

<sup>2</sup> Department Comments at 8.

<sup>3</sup> Xcel's full response to OAG Information Request 61 is provided as Exhibit R-1.

Fresh Energy TOU Rates			Rates - Cents per kWh			
with Standard Rate Comparison			TOU	Average	June -	October-
<i>Based on OAG IR No. 61</i>			Ratio	Monthly	September	May
<b>Fresh Energy TOU</b>						
On-Peak	2PM-6PM Weekdays	3.99		22.631	25.127	20.838
Mid-Peak	Other Hours	2.15		12.221	13.278	11.583
Off-Peak	12AM-6AM All days	1.00		5.676	5.676	5.676
<b>Standard Flat Rate</b>				12.386	13.437	11.742
<b>Fresh Energy TOU Percent Change from Standard Rate</b>						
On-Peak	2PM-6PM Weekdays			+83%	+87%	+77%
Mid-Peak	Other Hours			-1%	-1%	-1%
Off-Peak	12AM-6AM All days			-54%	-58%	-52%
<i>Notes: 1) Rates include fuel cost, 2) On-Peak excludes designated holidays</i>						

The prices are relatively similar to the prices for Xcel’s proposal, with a few differences. First, Xcel’s proposal was able to reduce the mid-peak price by eleven percent compared to the existing standard flat rate; Fresh’s proposal would set a mid-peak price that is essentially the same as the existing flat rate. Second, the on-peak price increase in Fresh’s proposal is slightly less sharp than the one in Xcel’s proposal. The OAG does not view these differences as particularly significant—the primary difference between the proposals comes down to the timing and duration of the on-peak period, not the pricing.<sup>4</sup>

Fresh supports the alternative on-peak proposal with four broad points. First, they suggest that the 2 p.m. hour is more appropriate to include in the on-peak period than the 6 p.m. or 7 p.m. hours based on either the average July day analysis provided by Xcel, or the peak-day analysis provided by Fresh. Second, Fresh suggest that Xcel’s on-peak proposal places too much

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<sup>4</sup> While the OAG stated in its initial comments that Xcel’s cost duration method is a rational and transparent method for setting prices in a TOU rate, the Commission could use a different price setting method if it would prefer.

weight on the out-years of its forecast period, that more weight should be placed on historical data and near-term forecasts, and that when the weight is properly distributed the alternative on-peak period is superior. Third, they suggest that it would be reasonable to base the analysis on data for both July and August (rather than Xcel’s proposal to use only July), because the historical system peak has sometimes occurred in August. Fresh concluded that average weekday demand in July and August supports their alternative on-peak proposal. Fourth, Fresh suggests that the on-peak period should be based on Xcel’s load at the time of MISO’s system peak, rather than Xcel’s own system peak. They produce information that their alternative on-peak period better captures MISO’s peak hours.

The OAG agrees with many of these points. Fresh’s alternative on-peak period is clearly a superior reflection of peak hours when applied to historical data, as demonstrated in Figure 1 and Figure 2 from the Fresh comments. A portion of Figure 1 is reproduced below:

Hour Ending	7/2/2012	8/26/2013	7/21/2014	8/14/2015	7/20/2016	Average
13	0.947	0.950	0.945	0.942	0.915	0.940
14	0.969	0.974	0.975	0.970	0.954	0.969
15	0.987	0.992	0.997	0.989	0.980	0.989
16	0.999	0.997	0.996	1.000	0.999	0.998
17	1.000	1.000	1.000	1.000	1.000	1.000
18	0.984	0.989	0.984	0.985	0.989	0.986
19	0.954	0.966	0.964	0.953	0.968	0.961
20	0.926	0.941	0.940	0.917	0.944	0.934
21	0.899	0.932	0.914	0.892	0.925	0.912

When compared to the historical data in Figure 1, the 2 p.m. hour<sup>5</sup> has greater demand than either the 6 p.m. or 7 p.m. hour in every year from 2012 through 2016. The 7 p.m. hour, in particular, has a noticeably lower amount of demand in each of the historical years.

The pattern continues when applied to Xcel’s forecasted peak days, contained in Fresh’s Appendix, a portion of which is reproduced below:

Hour Ending	7/26/2017	7/26/2018	7/25/2019	7/30/2020	7/29/2021	7/18/2022	6/8/2023	7/25/2024	Average
13	0.949	0.947	0.944	0.945	0.892	0.979	0.904	0.930	0.936
14	0.957	0.949	0.958	0.970	0.934	1.000	0.964	0.934	0.958
15	0.969	0.960	0.983	1.000	0.955	0.999	0.993	0.964	0.978
16	0.988	0.991	0.998	0.991	0.974	1.000	1.000	0.975	0.990
17	1.000	1.000	1.000	0.990	1.000	0.985	0.984	0.981	0.993
18	0.984	0.980	0.986	0.998	0.997	0.987	0.992	0.973	0.987
19	0.958	0.953	0.994	0.965	0.968	0.965	0.931	1.000	0.967
20	0.911	0.917	0.950	0.926	0.956	0.960	0.921	0.952	0.937
21	0.873	0.891	0.920	0.901	0.919	0.911	0.902	0.913	0.904

In five of the eight forecast years, the 2 p.m. hour has a significantly higher demand than either the 6 p.m. or 7 p.m. hour—including one year where the system peak would actually occur during the 2 p.m. hour, and one where the 2 p.m. hour is forecasted to be 99.9% of the system peak. There are a few years where the 6 p.m. hour has a higher peak than the 2 p.m. hour, but the 2 p.m. hour almost always has a higher peak than the 7 p.m. hour. The 6 p.m. hour does not become a clear winner over the 2 p.m. hour until 2024.

In summary, Fresh’s alternative proposal is clearly superior when applied to the historical data, and is somewhat better than Xcel’s proposal when applied to the near-term forecast years. Xcel’s proposal is superior when applied to 2024 and further out in the forecast. Deciding between the two proposals may come down to determining how to weigh historical data, near-term forecast data, and long-term forecast data.

<sup>5</sup> Reflected in the table as the “Hour-Ending 15.”

The OAG concludes that both Xcel's proposal and the alternative proposal from Fresh would lead to a beneficial TOU pilot. While this could indicate that both proposals should be tested in the pilot, there are some reasons that this may not be the best outcome. Specifically, multiple experiments may significantly increase the difficulty of the education and outreach component of the pilot. Xcel would need to develop two different sets of education programs, which would increase costs. More importantly, the information developed for one experiment group would conflict with the information developed for the other. It is easy to imagine a customer in one experiment group sharing information with a neighbor or acquaintance, who is in a different experiment group. It may be possible to iron out these challenges, but given the importance of developing an effective education component it may be best to focus on a single on-peak period for the pilot.

Having concluded that two experiment groups may not be the best path forward, the OAG supports Fresh's proposal for two reasons. First, it does seem reasonable to rely more heavily on the near-term years of the forecast, and specifically on the forecast years in which the pilot will actually be operating. It is important to be aware of Xcel's long-term forecast, but no reasonable party would dispute that forecasts become less reliable the farther they extend into the future. It is more reasonable to balance the historical data against the forecasts than to place the most weight on the long-term forecast data.

Second, it is likely that a 2 p.m. to 6 p.m. on-peak period will be easier for customers to respond to than a longer, later period as Xcel proposes. The key purpose of the TOU pilot is to discover the most effective ways to incentivize customers to shift their consumption. A peak period that is shorter in duration and which ends earlier in the day is better—as long as it still aligns with the system peak—because it provides customers with more options for delaying their

consumption to the mid-peak period. Fresh’s analysis indicates that its alternative on-peak period is well aligned with the historical peak, and the near-term forecasted peak. These conclusions lead the OAG to support Fresh’s alternative proposal.

**III. THE DEPARTMENT’S COST RECOVERY RECOMMENDATION IS BASED ON A REASONABLE INTERPRETATION OF THE LAW.**

Xcel has indicated that it intends to recover “the majority” of the \$10.95 million in costs for the TOU pilot through the Transmission Cost Recovery rider in a filing that will take place sometime after the TOU pilot is certified. In its Comments, the Department explains that Minnesota law limits the type of costs that may be recovered through the TCR rider to “the physical installation of facilities needed to modernize the grid.”<sup>6</sup> The Department recommends that, if the TOU Pilot is certified, the Commission clarify that it is certifying only the “costs associated with actual equipment (capital investment).”<sup>7</sup> Of the total investment of \$10.95 million, the Department identified \$2.89 million related to “non-capital costs” that would not be recoverable through a future TCR rider filing. In addition to its legal argument, the Department also suggests that it would not be reasonable for Xcel to recover operating costs because it is operating under a Multi-Year Rate Plan, and the utility “should be expected to manage its costs and expenses in such a way as to permit the Company to provide new rate offerings without recovery of every cost component through a rider.”<sup>8</sup>

The Department’s interpretation of the statute is a reasonable one. Minnesota Statutes section 216B.16, subdivision 7b (“the TCR Statute”) provides that three types of distribution investments may be recovered through the TCR rider: (1) the costs net of revenues for “new . . . distribution facilities that are certified as a priority project,” (2) the costs net of revenues of

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<sup>6</sup> Department Comments at 16.

<sup>7</sup> *Id.* at 17.

<sup>8</sup> *Id.*

“facilities . . . certified or deemed to be certified under section 216B.2425,” and (3) the costs associated with “investments in distribution facilities to modernize the utility’s grid that have been certified by the commission under section 216B.2425.” As the Department correctly notes, one common thread between each of these categories is that they are limited to costs for “facilities.” Facilities is not a defined term in Chapter 216B, but the common understanding of the term is “something . . . that is built, installed, or established to serve a particular purpose.”<sup>9</sup> This definition would include pilot costs for physical equipment that is installed, but would not include costs related to operations and management cost.

Because the purpose of certification is to permit a filing for rider recovery, the Commission should limit its certification of the TOU pilot to those costs that are related to actual equipment or facilities, as suggested by the Department. The OAG asked Xcel to provide a preliminary breakout of the costs, which are provided in OAG Information Request No. 62.<sup>10</sup>

## CONCLUSION

The Commission should take the following actions:<sup>11</sup>

- The Commission should find that the primary objective of a TOU rate is to reduce system peak demand, and that the goals of the TOU pilot should be to (1) determine the prices that will most effectively reduce peak demand; (2) identify the outreach and education strategies that are the most effective; and (3) understand the potential impact on vulnerable customer segments like low-income customers;
- The TOU pilot should be approved with changes, as follows:
  - The Commission should set an on-peak period of 2 p.m. to 6 p.m. on weekdays, with the prices set using Xcel’s cost duration methodology (the OAG would also support Xcel’s proposed on-peak period);

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<sup>9</sup> Merriam Webster Dictionary, <https://www.merriam-webster.com/dictionary/facility?src=search-dict-hed>.

<sup>10</sup> OAG Information Request No. 62 is attached as Exhibit R-2. Xcel estimates that \$2.5 million is not related to actual equipment or facilities, out of the total \$10.9 million in pilot costs.

<sup>11</sup> Changes and additions since the OAG’s Initial Comments are underlined.



- The Commission should require Xcel to provide improved bill protection for customers who self-identify as LIHEAP eligible in the TOU pilot pre-survey, rather than limiting the program to LIHEAP recipients;
  - The Commission should require Xcel to track customers who self-identify as LIHEAP eligible separately from customers who are LIHEAP recipients in order to preserve data for analysis;
  - The Commission should require Xcel to file a mid-pilot report including information and analysis about the performance of the pilot, the accuracy of the forecasts used to develop the pricing, the effectiveness of any marketing strategies, the indicators requested by the Citizens' Utility Board, and information about its proposed performance metrics as requested by the Department;
  - The Commission should consider establishing an enrollment target to reinforce the importance of the customer education program, and further consider establishing a limited financial incentive for the enrollment target;
  - The Commission should direct that the TOU pilot be operated with the goal of moving towards rolling out TOU rates to Xcel's entire residential customer base; and,
  - The Commission should require Xcel to explore methods for including net metering and other customers in future TOU rollouts.
- The Commission should certify the costs related to actual equipment or facilities, and decline to certify costs that are not related to actual equipment or facilities;
  - The Commission should require Xcel to explain its position on rider recovery during the MYRP; and,
  - In the future, significant changes such as new rate designs or new regulatory structures should be developed or reviewed by independent experts. If they are developed by Xcel or experts reporting to Xcel, the Commission should require Xcel to use a transparent

- method that is fully explained, and convene a stakeholder process to allow input on what the goals and outcomes should be.

Dated: February 26, 2018

Respectfully submitted,

LORI SWANSON  
Attorney General  
State of Minnesota

s/ **Ryan P. Barlow**

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LORI SWANSON  
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# STATE OF MINNESOTA

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February 26, 2018

Mr. Daniel Wolf, Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

**RE:** *In the Matter of Xcel's Residential Time of Use Rate Design Pilot Program*  
**MPUC Docket No. E002/M-17-775**

*In the Matter of Xcel's 2017 Biennial Distribution Grid Modernization Report*  
**MPUC Docket No. E002/M-17-776**

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matters please find Reply Comments of the Minnesota Office of the Attorney General – Residential Utilities and Antitrust Division.

By copy of this letter all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

s/ **Ryan P. Barlow**

RYAN P. BARLOW

Assistant Attorney General

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Enclosures

cc: Service List

**RE:** *In the Matter of Xcel's Residential Time of Use Rate Design Pilot Program*  
**MPUC Docket No. E002/M-17-775**

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**AFFIDAVIT OF SERVICE**

STATE OF MINNESOTA    )  
  ) ss.  
COUNTY OF RAMSEY    )

I, Judy Sigal, hereby state that on the 26th day of February, 2018, I e-filed with eDockets **Reply Comments of the Minnesota Office of the Attorney General – Residential Utilities and Antitrust Division** and served the same upon all parties, as indicated on the attached Service List via electronic submission and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

See Attached Service List

*s/ Judy Sigal*  
\_\_\_\_\_   
Judy Sigal

Subscribed and sworn to before me  
this 26th day of February, 2018.

*s/ Patricia Jotblad*  
\_\_\_\_\_   
Notary Public

My Commission expires: January 31, 2020.

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