

May 8, 2020

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. E002/AA-19-293 and E002/M-20-437

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Northern States Power Company doing business as Xcel Energy's Proposed Adjustment to the 2020 Annual Fuel Forecast and Monthly Fuel Cost Charges.

The Department recommends **approval** and is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Samir Ouanes
Public Utilities Rates Analyst

SO/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket Nos. E002/AA-19-293 and E002/M-20-437

I. SUMMARY

On April 23, 2020, Northern States Power Company, doing business as Xcel Energy, (Xcel or the Company) filed a petition (Petition) requesting that the Minnesota Public Utilities Commission (Commission) approve:

- its proposed \$25 million reduction of its Commission-approved 2020 fuel cost (FCA) forecast in Docket No. E002/AA-19-293; and
- its proposed corresponding reduction of the Commission-approved FCA charges for the June-August 2020 period.

II. BACKGROUND INFORMATION

On June 12, 2019, the Commission issued its *Order Approving Additional Details of New Fuel Clause Adjustment Process* (June 2019 Order) in Docket No. E999/CI-03-802 (03-802). Ordering Point 3 of the June 2019 Order stated that:

The Commission adopts a threshold of plus or minus 5 percent of all FCA costs and revenues to determine whether an event qualifies as a significant unforeseen impact that may justify an adjustment to the approved fuel rates. The Electric Utilities are permitted to implement revised rates following a 30-day notice period, subject to a full refund, if no party objects to the revised rates.

Ordering Point 9 of the November 14, 2019 Order in Docket No. E002/AA-19-293 (November 2019 Order) approved Xcel's proposed updates to its forecasted 2020 FCA costs and resulting monthly FCA rates.¹

On April 23, 2020, the Company filed a petition requesting that the Commission approve its proposed reduction of the fuel cost charges for the June-August 2020 period.

¹ Xcel's approved 2020 monthly FCA rates are shown in Attachment A, page 2 of 4 of Xcel's July 31, 2019 reply comments in Docket No. E002/AA-19-293 (per the November 2019 Order at page 71 of 80).

On April 29, 2020, the Commission issued a Notice of Shortened Comment Period (Notice) with the following topics open for comment:

1. Is the request consistent with the Commission's June 12, 2019 Order Approving Additional Details Of New Fuel Clause Adjustment Process (June 12, 2019 Order)?
2. Should the Commission approve the \$25 million reduction to the forecasted June, July and August 2020 fuel charges?
3. Does Commission approval also require a rule variance or a reopening of the June 12, 2019 Order?
4. Is the proposed handling of the \$25 million reduction reasonable?
5. Can Xcel implement the proposed changes as requested without prior Commission approval?
6. Are there other issues or concerns related to this matter?

The Department addresses the Notice's topics 1-3 and 5 (legal issues) in Section III, topic 4 in Section IV and topic 6 in Section V.

III. DEPARTMENT ANALYSIS-LEGAL ISSUES

The Department notes that the Covid-19 global pandemic has caused governments to declare peacetime emergencies, as reflected in Governor Walz's Emergency Executive Order 20-01 and subsequent executive orders, and has required regulatory agencies to take unprecedented steps to find methods and procedures to achieve desirable outcomes for Minnesota's residents.

The Company indicated that its proposed \$25 million refund to customers may not meet the June 2019 Order's five percent threshold to determine whether an event qualifies as a significant unforeseen impact that may justify an adjustment to the approved fuel rates.

However, in light of the unprecedented effects of the pandemic on utility operations, economic conditions, and consumers' personal finances, the Department supports Xcel's proposal to reduce its monthly fuel cost charges for all customers as soon as possible. The Company is simply proposing to provide an expected \$25 million reduction in its Commission-approved 2020 FCA forecast as a refund to customers sooner (when they need it) rather than waiting for the annual 2021 true-up that will be processed under the new FCA reform mechanism.

As a result, the Department supports Xcel's request for a variance to Ordering Point 3 of the June 2019 Order to the extent that the Commission determines that a variance is necessary. However, given what is expected to be a lack of disagreement about the refund, the Department suggests that a variance may not be needed, especially during this peacetime emergency and the need to act in a timely manner on behalf of Xcel's ratepayers.

Finally, the Department clarifies that its support of Xcel's proposal despite the amount not meeting the five percent threshold is directly related to the unprecedented effects of the coronavirus pandemic and as such should not be used as a precedent in future FCA filings.

IV. DEPARTMENT ANALYSIS-HANDLING OF THE \$25 MILLION REDUCTION

The November 2019 Order approved the following fuel cost charges (\$/kWh) for June, July and August 2020:²

| Class | June 2020 | July 2020 | August 2020 |
|------------------------------------|------------------|------------------|--------------------|
| Residential | \$0.03471 | \$0.03011 | \$0.02964 |
| C&I Non-Demand | \$0.03515 | \$0.03048 | \$0.03002 |
| C&I Demand | \$0.03405 | \$0.02953 | \$0.02908 |
| C&I Demand Time Of Day On-Peak | \$0.04258 | \$0.03694 | \$0.03637 |
| C&I Demand Time of Day Off-Peak | \$0.02785 | \$0.02416 | \$0.02379 |
| Outdoor Lighting | \$0.02721 | \$0.02359 | \$0.02323 |

The Company proposes the following fuel cost charges (\$/kWh) for June, July and August 2020:³

| Class | June 2020 | July 2020 | August 2020 |
|------------------------------------|------------------|------------------|--------------------|
| Residential | \$0.03134 | \$0.02717 | \$0.02657 |
| C&I Non-Demand | \$0.03173 | \$0.02752 | \$0.02691 |
| C&I Demand | \$0.03074 | \$0.02666 | \$0.02607 |
| C&I Demand Time Of Day On-Peak | \$0.03845 | \$0.03334 | \$0.03260 |
| C&I Demand Time of Day Off-Peak | \$0.02515 | \$0.02180 | \$0.02132 |
| Outdoor Lighting | \$0.02456 | \$0.02130 | \$0.02083 |

² Xcel’s approved 2020 monthly FCA rates are shown in Attachment A, page 2 of 4 of Xcel’s July 31, 2019 reply comments in Docket No. E002/AA-19-293 (per the November 2019 Order at page 71 of 80).

³ Attachment A, page 2 of 4 of the Petition.

The average bill reduction for a Residential customer is about \$6.60 over the June-August 2020 period.⁴

The Department verified that Xcel's proposed reduction in fuel cost charges for each class is consistent with the proposed \$25 million credit spread in equal parts over the June-August 2020 period.⁵ The Department concludes that they are reasonable.

As a result, the Department recommends approval of the proposed June, July and August 2020 fuel cost charges.

V. DEPARTMENT ANALYSIS-OTHER ISSUES

At page 3 of the Petition, Xcel stated:

To the extent the Company ultimately under-recovers its actual fuel expense in 2020, we hope the Commission will take this current proposal into account when evaluating our report next spring.

The Department appreciates the Company's attempt to mitigate the effects of the pandemic on its ratepayers and pass through to its customers the corresponding \$25 million cost reduction over the 2020 period.

Xcel may be concerned that the Commission-approved threshold to show prudence of costs before allowing recovery of under-collections may be set at the lower \$ per kWh FCA cost resulting from its current proposed reduction in its forecasted 2020 FCA costs.

The Department clarifies that the Commission-approved threshold to show prudence of costs should remain at the Commission's initially approved annual \$ per kWh FCA forecasted cost, independently from any subsequently proposed increase or decrease in the FCA forecasted cost.

Thus in response to the questions indicated in the Commission's Notice, the Department offers the following brief responses, as discussed further above:

- 1. Is the request consistent with the Commission's June 12, 2019 Order Approving Additional Details Of New Fuel Clause Adjustment Process (June 12, 2019 Order)?*

⁴ Department's calculation based on the June-August 2019 sales and number of residential customers provided in Xcel's May 1, 2020 Electric Jurisdictional Annual Report in Docket No. E999/PR-20-04.

⁵ For example, the \$0.00337/kWh reduction of the Residential class fuel cost charge in June 2020 is equal to the product of the Residential Class FAF ratio of 1.0177 times the ratio of the proposed June credit of \$8,333,000 by the forecasted June MN sales of 2,514,680,000 kWh.

Technically, no. However, as discussed above and summarized below, the Department supports Xcel's proposal in these unusual circumstances.

2. *Should the Commission approve the \$25 million reduction to the forecasted June, July and August 2020 fuel charges?*

Yes.

3. *Does Commission approval also require a rule variance or a reopening of the June 12, 2019 Order?*

Given what is expected to be a lack of disagreement about the refund, the Department suggests that a variance may not be needed, especially during this peacetime emergency and the need to act in a timely manner on behalf of Xcel's ratepayers.

4. *Is the proposed handling of the \$25 million reduction reasonable?*

Yes.

5. *Can Xcel implement the proposed changes as requested without prior Commission approval?*

Given what is expected to be a lack of disagreement about the refund and the existence of the peacetime emergency, the Department suggests that Commission approval could occur through a Consent Agenda.

6. *Are there other issues or concerns related to this matter?*

The Department has no other concerns at this time.

VI. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

The Department recommends approval of the proposed June, July and August 2020 fuel cost charges.

The Department supports Xcel's request for a variance to Ordering Point 3 of the June 2019 Order to the extent that the Commission determines that a variance is necessary.

The Department clarifies that its support of Xcel's proposal despite the amount not meeting the five percent threshold is directly related to the unprecedented effects of the coronavirus pandemic and as such should not be used as a precedent in future FCA filings.

The Department also clarifies that the Commission-approved threshold to show prudence of costs should remain at the Commission's initially approved annual \$ per kWh FCA forecasted cost, independently from any subsequently proposed increase or decrease in the FCA forecasted cost.

/ja

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. E002AI-19-293 and E002/M-20-437

Dated this **8th** day of **May 2020**

/s/Sharon Ferguson

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| Douglas | Larson | dlarson@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Peder | Larson | plarson@larkinhoffman.com | Larkin Hoffman Daly & Lindgren, Ltd. | 8300 Norman Center Drive Suite 1000 Bloomington, MN 55437 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
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| Ryan | Long | ryan.j.long@xcelenergy.com | Xcel Energy | 414 Nicollet Mall 401 8th Floor Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Kavita | Maini | kmainsi@wi.rr.com | KM Energy Consulting, LLC | 961 N Lost Woods Rd Oconomowoc, WI 53066 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E St. Paul, MN 55106 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Mary | Martinka | mary.a.martinka@xcelenergy.com | Xcel Energy Inc | 414 Nicollet Mall 7th Floor Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Brian | Meloy | brian.meloy@stinson.com | STINSON LLP | 50 S 6th St Ste 2600 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Joseph | Meyer | joseph.meyer@ag.state.mn.us | Office of the Attorney General-RUD | Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Stacy | Miller | stacy.miller@minneapolismn.gov | City of Minneapolis | 350 S. 5th Street Room M 301 Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| David | Niles | david.niles@avantenergy.com | Minnesota Municipal Power Agency | 220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_20-437_M-20-437 |

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|----------------|--------------------------------|--------------------------------------|--------------------------------------|--|--------------------|-------------------|------------------------|
| Carol A. | Overland | overland@legalectric.org | Legalelectric - Overland Law Office | 1110 West Avenue Red Wing, MN 55066 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131 | Electronic Service | Yes | OFF_SL_20-437_M-20-437 |
| Kevin | Reuther | kreuther@mncenter.org | MN Center for Environmental Advocacy | 26 E Exchange St, Ste 206 St. Paul, MN 551011667 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Amanda | Rome | amanda.rome@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 5 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Richard | Savelkoul | rsavelkoul@martinsquires.com | Martin & Squires, P.A. | 332 Minnesota Street Ste W2750 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Will | Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7th PI E Ste 350 Saint Paul, MN 55101 | Electronic Service | Yes | OFF_SL_20-437_M-20-437 |
| Janet | Shaddix Elling | jshaddix@janetshaddix.com | Shaddix And Associates | 7400 Lyndale Ave S Ste 190 Richfield, MN 55423 | Electronic Service | Yes | OFF_SL_20-437_M-20-437 |
| Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | 76 W Kellogg Blvd St. Paul, MN 55102 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Byron E. | Starns | byron.starns@stinson.com | STINSON LLP | 50 S 6th St Ste 2600 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
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| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
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| Lisa | Veith | lisa.veith@ci.stpaul.mn.us | City of St. Paul | 400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
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| Samantha | Williams | swilliams@nrdc.org | Natural Resources Defense Council | 20 N. Wacker Drive Ste 1600 Chicago, IL 60606 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Joseph | Windler | jwindler@winthrop.com | Winthrop & Weinstine | 225 South Sixth Street, Suite 3500 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-437_M-20-437 |
| Patrick | Zomer | Patrick.Zomer@lawmoss.com | Moss & Barnett a Professional Association | 150 S. 5th Street, #1200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_20-437_M-20-437 |