

June 4, 2020

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

**–Via Electronic Filing–**

RE: REPLY TO SUPPLEMENTAL COMMENTS  
APPROVAL OF THE ACQUISITION OF THE MOWER COUNTY WIND FACILITY  
DOCKET NO. E002/PA-19-553

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these brief comments in reply to the Department of Commerce, Division of Energy Resources' (Department) Supplemental Comments in this docket.

In response to the Department's proposed conditions, should the Commission approve our proposed acquisition, the Company proposes the following conditions:

- The Company must justify any costs (including O&M expense, ongoing capital expense—including revenue requirements related to capital included in rate base—including insurance expense, land lease expense, and property/production tax expense) that are higher than forecasted in this proceeding. The Company acknowledges that it bears the burden of proof in any future regulatory proceeding related to the recovery of costs above those forecasted in this proceeding.
- Customers must be sufficiently protected from risks associated with the non-deliverability of accredited capacity and/or energy from the projects. The Company shall report annually the energy production levels from the facility and shall explain in detail the causes for any long-term shortfalls in production compared to forecasted levels. The Commission may make adjustments to recovery in the future if actual production varies significantly from assumed production over an extended period.
- The Company must credit to its customers 100 percent of any additional production tax credits (PTCs) received in connection with the Mower County Wind Facility that it receives as a result of any extension related to PTCs.

The Company believes these alternative conditions will achieve the Department's goal of protecting customers by clearly delineating the Company's obligations as owners of the Mower County Wind Facility. We also note that the Company no longer plans to acquire the repowered Facility through an unregulated affiliate, should the Commission deny the proposed acquisition.

We respectfully request that this matter be heard by the Commission as soon as possible in order to preserve as much of this year's construction season as possible to complete work on this project.

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 me at (612) 330-6064 or [bria.e.shea@xcelenergy.com](mailto:bria.e.shea@xcelenergy.com) or Farah Mandich at (612) 330-5918 or [farah.l.mandich@xcelenergy.com](mailto:farah.l.mandich@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA  
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

c: Service List

## 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

or

xx electronic filing

**Docket No. E002/PA-19-553**

Dated this 4th day of June 2020

/s/

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Lynnette Sweet  
Regulatory Administrator

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