July 1, 2020

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Proposed Streamlining for Annual Revenue Decoupling Evaluation Reports for Center Point Energy, Great Plains Natural Gas Company, Minnesota Energy Resources Corporation, and Xcel Energy Electric.**
Docket Nos. G008/M-19-558, G004/M-20-335, G011/M-20-332, E002/M-20-180

Dear Mr. Seuffert:

In its December 5, 2019 Decision on Minnesota Energy Resources Corporation's (MERC) 2018 Evaluation Report (Docket No. G011/M-19-201) and its January 30, 2020 Order on Center Point Energy's 2018 Decoupling Evaluation Report (Docket No. G008/M-19-558) the Minnesota Public Utilities Commission (Commission) required the utilities to work with the Minnesota Department of Commerce, Division of Energy Resources (Department) and other stakeholders on the development of a more streamlined Annual Evaluation Report. Based on meetings with the four investor-owned utilities that the Commission requires to submit annual revenue decoupling evaluations, and other parties, the Department presents the attached comments and streamlined revenue decoupling evaluation proposal. The Department proposes that the Commission replace the currently approved evaluation plan requirements for each of the affected utilities with this annual decoupling evaluation proposal.

The Department appreciates the participation and cooperation of all of the parties that helped craft the attached proposal.

The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ CHRISTOPHER T. DAVIS
Analyst Coordinator

CTD/ar
Attachment

Before the Minnesota Public Utilities Commission

Proposal of the Minnesota Department of Commerce
Division of Energy Resources

Docket Nos. G008/M-19-558, G004/M-20-335, G011/M-20-332, E002/M-20-180

I. INTRODUCTION

Currently, the Minnesota Public Utilities Commission (Commission) has approved revenue decoupling mechanisms (RDM) for four Minnesota investor-owned utilities (IOUs). Three of the IOUs sell gas—Minnesota Energy Resources Corporation (MERC), CenterPoint Energy (CenterPoint) and Great Plains Natural Gas (Great Plains). The Commission has approved decoupling for only one electric IOU—Xcel Energy. So far, only CenterPoint's RDM has been approved as a permanent rate. The other three IOUs' RDMs are considered pilot projects.

For each of the utilities' approved RDMs, the IOUs are required to submit annual calculations of deferrals, the resulting surcharges or refunds per affected customer class, and evaluation reports concerning the utility's commitment to increased energy savings. The first evaluation plan approved by the Commission was for CenterPoint Energy in Docket No. G008/GR-08-1075. The approved evaluation plan was modeled after a plan approved by the Washington Utilities and Transportation Commission (WUTC Docket UG-060518) to monitor and evaluate the decoupling pilot program authorized for the Avista Corporation, d/b/a Avista Utilities. All four of the IOUs with RDMs currently submit annual evaluation reports that often exceed 100 pages in length. However, the Commission only considers a small portion of what is included in the evaluation reports.

A. COMMISSION REQUEST FOR A STREAMLINED ANNUAL DECOUPLING EVALUATION REPORT

On page 7 of its Comments on MERC's 2018 Decoupling Evaluation Report, Docket No. G011/M-19-201, the Minnesota Department of Commerce, Division of Energy Resources (Department) stated:

> In recent years, the Department has primarily focused on the part of the evaluation report that focuses on the utilities' CIP energy savings achievements because Minnesota Statutes § 216B.2416, subd. 1 states that the purpose of decoupling is to reduce a utility's disincentive to promote energy efficiency. No other party has been commenting on other parts of the evaluation plans. For administrative efficiency the Department will consult with the utilities that have decoupling and Commission Staff to see if there is an agreement on whether there are parts of the evaluation reports that can be eliminated, and if so, present proposed reporting requirement modifications for future evaluation reports to the Commission.

Since then, the Commission has required two utilities to work with the Department and other stakeholders to develop a streamlined annual revenue decoupling evaluation report:

The Commission's December 5, 2019 Decision on Docket No. G011/M-19-201, MERC's 2018 Decoupling Evaluation Report, required Points 3 and 4 regarding streamlining its annual decoupling evaluation report:

- Required MERC to work with the Department and other stakeholders, and to request the involvement of other utilities, on the development of a more streamlined Annual Evaluation Report; and
- Required MERC to make a compliance filing detailing proposed changes to the Annual Evaluation Report by July 31, 2020.

In addition, the Commission's January 30, 2020 Order in Docket No. G008/M-19-558, Center Point Energy's Decoupling Evaluation Report, included Ordering Points 3 and 4 regarding streamlining CenterPoint's annual decoupling evaluation report:

- Requested that CenterPoint work with the Department of Commerce and other stakeholders on the development of a more streamlined Annual Evaluation Report.
- Required CenterPoint Energy to make a compliance filing detailing proposed changes, if any, to the Annual Revenue Decoupling Evaluation Report by July 31, 2020.

B. UTILITIES WITH REVENUE DECOUPLING

1. Commission approval of evaluation plans

Below, the Department provides a summary of the Commission's decoupling-related decisions in the rate case in which the Commission approved a decoupling evaluation plan for each of the IOUs with an RDM.

a.) CenterPoint Energy

The Commission approved CenterPoint's full decoupling revenue rider on June 9, 2014 in Docket No. E008/GR-13-316 as a three-year pilot project. As required by the Commission's Order, CenterPoint submitted a revenue decoupling evaluation plan on October 14, 2014 as part of its Decoupling Compliance Filing. On March 31, 2015 the Commission accepted CenterPoint's Decoupling Compliance filing, including its proposal for updating the decoupling mechanism when potential future interim rates are in place.

b.) MERC

On July 13, 2012, the Commission approved MERC's full decoupling mechanism in Docket No. G007,011/GR-10-977.[1] As part of its approval, the Commission approved MERC's decoupling evaluation plan submitted by MERC witness Valerie H. Grace in her June 2, 2011 Rebuttal Testimony.

c.) Xcel Electric

On May 8, 2015, the Commission approved a full decoupling pilot program for Xcel Electric in Docket No. E002/GR-13-868.[2] The requirements for Xcel's evaluation report were included as Order Point 40 e.

d.) Great Plains

On September 6, 2016, the Commission approved a full decoupling pilot program for Great Plains in Docket No. G004/GR-15-879.[3] The September 30, 2015 Direct Testimony of Tamie Aberle provides an outline of an evaluation report on page 29.[4]

2. Current evaluation plan filing schedules

The current approved timing of IOU RDM evaluation plans leads to inefficiencies in the consideration of the evaluation plans. One reason is that the evaluation plans are sometimes submitted before the utilities have finished estimating their energy savings from the previous CIP year and submitting the information to the Department in the annual CIP Status Reports, which are filed each year between April 1 and May 1.

Currently, the four IOUs with decoupling have the following filing schedules:

a.) CenterPoint**.** On September 1 of each year, CenterPoint Energy submits a combined RDM adjustment calculation and evaluation report. This filing schedule both allows CenterPoint, parties and the Commission to consider CIP savings from the previous

[1] In the Matter of the Application of Minn. Energy Res. Corp. for Authority to Increase Rates for Nat. Gas Serv. In Minn., Docket No. G-007, 011/GR-10-977, Findings of Fact, Conclusions, and Order at 50-51 (July 13, 2012).
[2] In the Matter of the Application of N. States Power Co. for Authority to Increase Rates for Elec. Serv. In the State of Minn., Docket No. E-002/GR-13-868, Findings of Fact, Conclusions, and Order at 102-103 (May 8, 2015).
[3] In the Matter of the Petition by Great Plains Nat. Gas Co., a Division of MDU Res. Group, Inc., for Authority to Increase Nat. Gas Rates in Minn., Docket No. G-004/GR-15-879, Findings of Fact, Conclusions, and Order at 41-42, 56 (September 6, 2016).
[4] Great Plains witness Tamie Aberle mentioned in testimony that Great Plains would examine the evaluation reports of other Minnesota IOUs and work with parties to develop its final evaluation plan, but the Department could not find any evidence in the record of this happening.

year and is efficient because the Commission can consider the RDM adjustment and evaluation report together.

b.) MERC**.** On March 1 of each year, MERC submits an RDM adjustment calculation. On May 1 of each year, MERC submits its annual RDM evaluation report. This filing schedule allows MERC, parties and the Commission to consider CIP achievements from the previous year, but the schedule is inefficient because having two filings sets up the potential situation where the Commission has to consider two different filings instead of one.

c.) Xcel Electric. On February 1 of each year, Xcel Electric submits a combined filing that provides the calculations for each customer class's RDM deferral and an evaluation. This filing schedule does not allow Xcel, parties or the Commission to consider CIP achievements from the previous year.

d.) Great Plains**.** On March 1 of each year, Great Plains submits a filing that provides the calculations for each customer class's RDM deferral and an evaluation. This filing schedule does not allow Great Plains, parties or the Commission to consider CIP achievements from the previous year.

C. STATUTORY AND COMMISSION GUIDANCE FOR DESIGNING STREAMLINED ANNUAL DECOUPLING EVALUATION REPORTS

Minn. Stat. § 216B.2412, subd.1 states, in part, that the purpose of an RDM is to reduce a utility's disincentive to promote energy efficiency. In addition, Minn. Stat. § 216B.2412, subd.2 states, in part, that for evaluating potential RDM proposals, the Commission shall design the criteria and standards to mitigate the impact on public utilities of the energy-savings goals under section 216B.241 without adversely affecting utility ratepayers. The Department continues to conclude that RDM evaluations should review whether the program meets the stated statutory objectives of: (1) reducing the Company's disincentive to promote energy savings, (2) achieving energy savings, and (3) doing so without adversely affecting utility ratepayers. These three statutory objectives are discussed below.

1. Reducing an IOU's Disincentive to Promote Energy Savings

Minnesota's 4 IOUs with RDMs all implement full decoupling. Full decoupling means that a utility's actual sales are not adjusted to reflect sales under normal weather (or any other factor); instead, the level of sales for any given year is compared to the level of sales approved in the most recent rate case. The Commission has agreed that the utilities' RDM design reduces the IOUs disincentive to attain the energy savings goals under section 216B.241. The Department does not believe that specific quantitative data or qualitative narrative is needed to demonstrate this statutory requirement. However, the annual evaluation filings provide an opportunity for the IOU or other parties to propose changes that would bring the RDM more in line with statutory requirements.

2. *Evaluating Utility's Commitment to Increased Energy Savings*

Since reducing an IOU's disincentive to achieve energy savings is the goal of RDMs, the RDM evaluation should review whether the utility achieved energy savings through its Conservation Improvement Program (CIP). Although the analysis should include energy savings for the utility's entire portfolio, the most important energy savings to evaluate are those achieved by the customer classes to which the RDM applies.

3. *Not harming ratepayers*

Each year, utilities with decoupled customer classes provide data showing the revenues collected over the 12-month period and calculate whether, under their approved RDM rates, the collections resulted in an over or under collection. The data must be sufficient to provide the Commission with a basis for approving RDM adjustments. The data should also show the impact of the adjustments on the average utility customers' bills, partly to demonstrate over time whether a decoupling mechanism "harms" ratepayers.

D. *DECOUPLING EVALUATION REPORT STREAMLINING GROUP*

The Department and other parties have participated in a stakeholder process since March 2020. The process was initiated by CenterPoint, which emailed to the Department its proposed modifications to its currently approved evaluation report requirements. The Department initially provided a written response to CenterPoint Energy's proposal and eventually the two parties came to a general agreement on what information should be included in a streamlined evaluation report. The Department then shared the agreement with the other three IOUs with decoupled customer classes as well as other stakeholders.

On June 2, 2020 the Department convened a stakeholders group to discuss whether a consensus could be reached on what information each IOU should submit in its annual evaluation reports. Participants included:

- Center for Energy and the Environment (CEE);
- CenterPoint;
- Commission Staff;
- The Department;
- Fresh Energy;
- Great Plains;
- Minnesota Power;
- Office of Attorney General, Residential Utilities Division (OAG-RUD); and
- Otter Tail Power.

Based on the stakeholders' discussions, the Department presents a proposal for the Commission's consideration below.

II. STAKEHOLDERS' ANNUAL DECOUPLING EVALUATION PROPOSAL

Below the Department presents the Streamlined Decoupling Evaluation Proposal in three sections:

- The filing date of each IOU's annual decoupling evaluation report;
- The data and narrative each IOU should provide regarding energy savings achievements; and
- The calculation of each IOU's billing factors, etc.

A. FILING DATES

Below are the proposed filing dates for each IOU to submit its Streamlined Decoupling Evaluation Report. Each of these dates are either on or after the utility submits its CIP Status Report to the Department, and thus the IOU will have already aggregated the CIP energy and demand savings that will assist the Commission and other parties in evaluating the utility's decoupling mechanism. For two of the utilities, Great Plains and MERC, the new filing dates for the evaluation reports will also mean that their new RDM rates will have a different starting date.

1. CenterPoint Energy

CenterPoint Energy will continue to submit its annual evaluation plan on September 1 of each year. CenterPoint submitted its latest annual evaluation plan on September 1, 2019 in Docket No. G008/M-19-558. For CenterPoint, the Department recommends that the Commission approve the Proposed Streamlined Decoupling Evaluation Plan in Docket No. G008/M-19-558.

2. Great Plains

Great Plains proposes to submit its annual evaluation plan on May 15 of each year. Great Plains submitted its latest annual decoupling evaluation plan on February 28, 2020 and May 1, 2020 in G004/M-20-335. The Department recommends that the Commission approve the Proposed Streamlined Decoupling Evaluation Plan for Great Plains in Docket No. G004/M-20-335.

3. MERC

MERC proposes to submit its annual evaluation plan on June 1 of each year. MERC submitted its latest annual evaluation plan on February 28, 2020 and May 1, 2020 in Docket No. G011/M-20-332. The Department recommends that the Commission approve the Proposed Streamlined Decoupling Evaluation Plan in Docket No. G011/M-20-332.

4. Xcel Electric

Xcel proposes to submit its annual evaluation report on April 1 of each year. Xcel submitted its latest annual evaluation plan on January 31, 2020 in Docket No. E002/M-20-180. The Department recommends that the Commission approve the proposed Streamlined Decoupling Evaluation Plan in Docket No. E002/M-20-180.

B. COMMITMENT TO INCREASED ENERGY SAVINGS

Since reducing an IOU's disincentive to achieve energy savings is the goal of RDMs, the RDM evaluation should review whether the utility achieved energy savings. Although the analysis should include energy savings for the utility's entire portfolio, the most important energy savings to evaluate are those achieved by the customer classes to which the RDM applies.

The following data in narrative, numerical, table and/or graph form should be used to inform an IOU's narrative describing its energy savings before and after implementing revenue decoupling:

1. Brief overview of CIP portfolio. Narrative discussing changes made in the most recent triennial CIP, including any changes in marketing.
2. *Annual first-year energy savings.* Compare the utility's annual first-year energy savings for each of the past 5 years to the utility's average first-year energy savings for the three years preceding each utility's implementation of its RDM. Utilities should present the information on a total CIP basis and on a rate class basis, if possible, in a way that facilitates evaluation of the change in energy savings by customers in the rate classes with decoupled rates.
3. *Lifetime energy savings.* Present the utility's lifetime energy savings for each of the past 5 years. Utilities should present the information on a total CIP basis and on a rate class basis, if possible, in a way that facilitates evaluation of the change in energy savings by customers in the rate classes that have decoupled rates.
4. Annual first-year energy savings for each year (beginning with three years before RDM implementation and ending with the year prior to RDM evaluation) presented as a percent of weather-normalized retail sales from non-CIP-out customers as specified in Minn. Stat. 216B.241 Subd. 1c. (b).
5. Comparison of the relevant average fuel (gas or electric) use per customer for each decoupled customer class for the three years before RDM implementation and the years after.

C. CALCULATION OF RDM DEFERRAL AND BILLING ADJUSTMENT FACTORS

Each year, utilities with decoupled customer classes provide data showing the revenues collected over the 12-month period and calculate whether, under their approved RDM rates, the collections resulted in an over or under collection. The data should provide the Commission with a basis for approving RDM adjustments. The data should also show the impact of the adjustments on the average utility customers' bills, partly to demonstrate over time whether a decoupling mechanism "harms" ratepayers.

Below is a proposed list of the minimum amount of narrative and data that should be included.

1. Brief explanation of how RDM overcollection/undercollection and RDM rates are calculated.
2. Annual amount of revenue over/under collected by customer class through the RDM during the evaluation period, before and after any adjustments to reflect the cap. Supporting detail should include monthly sales and number of customers. Electric utilities should include a description of how cooling degree days (CDD) and heating degree days (HDD) varied from those assumed in the last rate case. Gas utilities should include description of how HDD varied from those assumed in the last rate case.
3. Describe whether the approved cap has come into play for any decoupled class since RDM was implemented. The discussion should include identification of the time period(s), the customer class(es) affected, and what the RDM adjustment would have been without the cap.
4. Describe any changes to the IOU's methods or calculations of the decoupling adjustment over the course of the pilot. Describe any such changes, their purpose, and impact on the deferral.
5. By rate class – the per therm or per kWh rate charged, the overall rate surcharge/refund, the actual annual gas/electric use per customer, and the estimated bill impact on average customers. If there is a wide variation of consumption in the customer class, the utility may provide estimated bill impacts on customers with a range of consumption.
6. Indicate whether the IOU filed any rate cases during the RDM implementation period, and when. To the extent new base rates took effect during the pilot period, indicate when those new rates took effect and what impact the revised rates had on the methods and mechanics of the RDM over/under collection calculations.
7. Provide a table showing the historical net surcharges/refunds for each decoupled class and for the utility as a whole.
8. Provide tables showing the calculation of all past RDM factors (including over/under collections of revenues and forecasted sales).
9. If the IOU includes the RDM adjustment per unit of energy in its tariff/rider, include an updated RDM Tariff Sheet in redline and final format.

III. CONCLUSION AND RECOMMENDATIONS

The Department recommends that the Commission approve the Streamlined Annual Decoupling Evaluation Plan for all current and future IOUs that have revenue decoupling mechanisms. The new evaluation plan would include the following:

A. COMMITMENT TO INCREASED ENERGY SAVINGS

1. Brief overview of CIP portfolio. Narrative discussing changes made in the most recent triennial CIP, including any changes in marketing.
2. Annual first-year energy savings. Compare the utility's annual first-year energy savings for each of the past 5 years to the utility's average first-year energy savings for the three years preceding each utility's implementation of its RDM. Utilities should present the information on a total CIP basis and on a rate class basis, if possible, in a way that facilitates evaluation of the change in energy savings by customers in the rate classes with decoupled rates.
3. Lifetime energy savings. Present the utility's lifetime energy savings for each of the past 5 years. Utilities should present the information on a total CIP basis and on a rate class basis, if possible, in a way that facilitates evaluation of the change in energy savings by customers in the rate classes that have decoupled rates.
4. Annual first-year energy savings for each year (beginning with three years before RDM implementation and ending with the year prior to RDM evaluation) presented as a percent of weather-normalized retail sales from non-CIP-out customers as specified in Minn. Stat. 216B.241 Subd. 1c. (b).
5. Comparison of the relevant average fuel (gas or electric) use per customer for each decoupled customer class for the three years before RDM implementation and the years after.

B. CALCULATION OF RDM DEFERRAL AND BILLING ADJUSTMENT FACTORS

1. Brief explanation of how RDM overcollection/undercollection and RDM rates are calculated.
2. Annual amount of revenue over/under collected by customer class through the RDM during the evaluation period, before and after any adjustments to reflect the cap. Supporting detail should include monthly sales and number of customers. Electric utilities should include a description of how cooling degree days (CDD) and heating degree days (HDD) varied from those assumed in the last rate case. Gas utilities should include a description of how HDD varied from those assumed in the last rate case.
3. Describe whether the approved cap came into play for any decoupled class since RDM was implemented. The discussion should include identification of the time period(s), the customer class(es) affected, and what the RDM adjustment would have been without the cap.

4. Describe any changes to the IOU's methods or calculations of the decoupling adjustment over the course of the pilot. Describe any such changes, their purpose, and impact on the deferral.
5. By rate class – the per therm or per kWh rate charged, the overall rate surcharge/refund, the actual annual gas/electric use per customer, and the estimated bill impact on average customers. If there is a wide variation of consumption in the customer class, the utility may provide estimated bill impacts on customers with a range of consumption
6. Indicate whether the IOU filed any rate cases during the RDM implementation period, and when. To the extent new base rates took effect during the pilot period, indicate when those new rates took effect and what impact the revised rates had on the methods and mechanics of the RDM over/under collection calculations?
7. Provide a table showing the historical net surcharges/refunds for each decoupled class and for the utility as a whole.
8. Provide tables showing the calculation of all past RDM factors (including over/under collections of revenues and forecasted sales).
9. If the IOU includes the RDM adjustment per unit of energy in its tariff/rider, include an updated RDM Tariff Sheet in redline and final format.

In addition, the Department recommends that the Commission approve the following annual decoupling evaluation report due dates as requested by each utility:

1. Center Point Energy—September 1 of each year
2. Great Plains -- May 15 of each year
3. MERC -- June 1 of each year
4. Xcel Electric -- April 1 of each year

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
Letter

Docket No. G008/M-19-558, G004/M-20-335, G011/M-20-332, and E002/M-20-180

Dated this **1st** day of **June 2020**

/s/Sharon Ferguson

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