COMMERCE DEPARTMENT

April 2, 2019

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. E002/M-19-127

Dear Mr. Wolf:

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

Northern States Power d/b/a Xcel Energy (Xcel) 2018 Decoupling Annual Report.

The decoupling evaluation report was filed on February 1, 2019 by:

Lisa R. Peterson
Manager, Regulatory Analysis
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401

The Department recommends that the Commission **approve Xcel's 2018 Annual Decoupling Report.** The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ CHRISTOPHER T. DAVIS
Analyst Coordinator

CTD/ja
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. E002/M-19-127

I. BACKGROUND

On May 8, 2015, the Minnesota Public Utilities Commission (the Commission) issued its *Findings of Fact, Conclusions and Order (2013 Rate Case Order)* in Northern States Power Company d/b/a Xcel Energy's 2013 Rate Case (Docket No. E002/GR-13-868).

As part of this *Rate Case Order*, the Commission authorized Xcel to conduct a full decoupling program[1] on a pilot basis for three years (aka Revenue Decoupling Mechanism or RDM) under Minnesota Statute § 216B.2412, subd.1. Full decoupling means that Xcel's actual sales are not adjusted to reflect sales under normal weather (or any other factor); instead, the level of actual, unadjusted sales for any given year is compared to the level of sales approved in the most recent rate case.

Order Point 40 e. of the Commission's May 8, 2015 Order required Xcel to submit an annual report to the Commission by February 1 of each year prior to any application of an RDM adjustment factor on April 1. The Commission's Order stated that the report shall include the following information:

- i. Total over- or under-collection of allowed revenues by customer class or group;
- ii. Total collection of prior deferred revenue;
- iii. Calculations of the RDM deferral amounts;
- iv. The number of customer complaints;
- v. The amount of revenues stabilized and how the stabilization impacted Xcel's overall risk profile;
- vi. A comparison of how revenues under traditional regulation would have differed from those collected under partial and full decoupling;
- vii. A description of all new and existing demand-side-management programs and other conservation initiatives Xcel had in effect for the year covered by the report;
- viii. A description of the effectiveness of all new and existing demand-side management programs and other conservation initiatives Xcel had in effect for the year covered by the report; and

[1] "Full decoupling" means that the effects of weather are included in subsequent decoupling rate credits or surcharges, whereas "partial decoupling" excludes the effects of weather on decoupling rate adjustments.

ix. Other factors that may have contributed to a decline in energy consumption, including weather and the economy.

On August 31, 2015 the Commission issued its *Order Reopening, Clarifying, and Supplementing May 8, 2015 Order* (2015 Clarifying Order).

The 2015 Clarifying Order affirmed the decisions of the Commission's May 8, 2015 Order regarding the revenue decoupling mechanism's implementation. Further, Order points 7 and 8 of the 2015 Clarifying Order stated:

> 7. Xcel shall set the baseline fixed revenue per customer and baseline fixed energy charges using the authorized revenues from whatever rates are in place, be that final rates from this rate case (if Xcel decides not to file another rate case) or final rates from a future rate case (if Xcel files a rate case for 2016).
>
> 8. Xcel shall implement revenue decoupling according to the following schedule:
>   - 2016, January – December: Measure 2016 decoupling deferrals
>   - 2017, January – December: Measure 2017 decoupling deferrals
>   - 2017, after new rates approved: Implement 2016 decoupling adjustments
>   - 2018, January – December: Measure 2018 decoupling deferrals
>   - 2018, April 1: Implement 2017 decoupling adjustments
>   - 2019, April 1: Implement 2018 decoupling adjustments
>   - 2020: True-up balance

On February 1, 2017, Xcel submitted its 2016 Decoupling Annual Report (2016 Report). The 2016 Report stated:

> …the first year of the RDM is unique in that it relies on outcomes from our currently pending rate case (Docket No. E002/GR-15-826) to set the baseline, which will not be available until later this year. We therefore use information from the record of our pending case to illustrate the potential impacts of the RDM on the decoupling classes in this first Annual Report.

Xcel stated that it would submit the final RDM adjustments for approval in its final rates compliance filing in E002/GR-15-826 (2015 Rate Case).

On July 12, 2017, Xcel submitted its *Final Rates Compliance* in its 2015 Rate Case. The compliance included Schedule 10 concerning decoupling programs. Schedule 10 showed the revenue decoupling model results for 2016. Schedule 10B showed the revenue decoupling monthly baseline Fixed Revenue per Customer (FRC) and baseline Fixed Energy Charge (FEC) by class for 2017.[2]

The Commission's September 29, 2017 *Order Approving Compliance Filing with Modifications* (September 2017 Order) approved the sales figures in Xcel's July 12, 2017 compliance filing.

On February 15, 2018, the Commission accepted Xcel's 2016 Annual Decoupling Report and approved Xcel's calculation of its October 2017-March 2018 RDM Factors as shown in Table 1 below.

Table 1: Calculation of Xcel's October 2017-March 2018 RDM Factors

	Residential Without Space Heating	Residential	Small General Service (non-demand)
2016 Under/(Over) Collection	($2,577,473)	$936,992	($128,650)
October 2017-March 2018 Forecasted Sales	3,971,452,212	260,289,792	442,436,664
RDM Factor Surcharge/(Refund)	($0.000649)	$0.003600	($0.000291)

On February 1, 2018, Xcel submitted its Annual Decoupling Report for 2017. Table 2 below shows Xcel's calculation of the Company's April 1, 2018-March 31, 2019 RDM Factors.

Table 2: Xcel's Approved April 2018-March 2019 RDM Factors

	Residential Without Space Heating	Residential	Small General Service (non-demand)	Total
2017 Under/(Over) Collection	$25,047,593	$933,610	$1,088,400	$27,069,603
Carry Over Balance	($18,995)	($13,466)	$3,738	($28,723)
Total	$25,028,598	$920,144	$1,092,138	$27,040,880
April 2018-March 2019 Sales*	8,168,639,281	389,796,446	877,087,737	NA
RDM Factor Surcharge/(Refund)	($0.003064)	($0.002361)	($0.001245)	NA

As shown in Table 2, Xcel's 2018/2019 RDM factors were based on its undercollection of funds in 2017, carryover from its October 2017-March 2018 RDM Factor implementation, and forecasted sales for April 1, 2018-March 31, 2019. Xcel's RDM calculations resulted in an

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[2] The factors are based on 2016 actual, weather-normalized test year sales and customer counts, and 2017 rates from the 2015 rate case proceeding.

approximate overall $27.1 million of undercollection due to a cooler than normal summer and warmer than normal winter.[3]

On February 1, 2019, Xcel submitted its 2018 Annual Decoupling Report. Table 3 below shows Xcel's calculation of the Company's proposed April 1, 2019-March 31, 2020 RDM Factors.

Table 3: Xcel's Calculation of its April 2019-March 2020 RDM Factors

	Residential Without Space Heating	Residential	Small General Service (non-demand) ($/kWh)	Total
Under/(Over) Collection	($12,542,022)	($290,755)	($184,588)	($13,017,365)
Carry Over Balance	($684,676)	($139,710)	$166	($824,220)
Total	($13,226,698)	($430,465)	($184,422)	($13,841,585)
April 2019-March 2020 Sales*	8,137,868,546	407,767,340	864,133,606	NA
RDM Factor Surcharge/(Refund)	($0.001625)	($0.001056)	($0.000213)	NA

As shown in Table 3 above, Xcel's calculation of the Company's April 1, 2019-March 31, 2020 RDM Factors are based on the Company's 2018 overcollection of funds, carryover from its April 2018-March 2019 RDM Factor implementation, and forecasted sales for April 1, 2019-March 31, 2020.

Table 4 below shows Xcel's total RDM deferrals from January 1, 2016 through December 31, 2018.

Table 4: Xcel's RDM Deferrals for January 1, 2016-December 31, 2018

	Under/(Over) Collection			
Year	Residential Without Space Heating	Residential	Small General Service (non-demand)	Total
2016	($2,577,473)	$936,992	($128,650)	($1,769,131)
2017	$25,047,593	$933,610	$1,088,400	$27,069,603
2018	($12,542,022)	($290,755)	($184,588)	($13,017,365)
Total	$9,928,098	$1,579,847	$775,162	$12,283,107

As can be seen in Table 4, thus far Xcel's RDM has resulted in net surcharges of $12.3 million over three years for the Company's three decoupled customer classes.

[3] Winter weather, as measured by Heating Degree Days, was 7.9 percent warmer than normal. Summer weather, as measured by a Temperature Humidity Index (THI), was 9.3 percent cooler than normal.

II. DEPARTMENT ANALYSIS

A. OVERVIEW

The purpose behind Xcel's RDM Rider is to eliminate the Company's throughput incentive and thus eliminate any Company disincentive to encourage its customers to invest in energy savings. Under its RDM Rider, Xcel is allowed to recover its authorized revenues for non-fuel costs, regardless of causes in variation (including weather, changes in economic factors, etc.), up to the approved revenue cap. Xcel's RDM Rider applies to the Company's residential non-space heating, residential space heating, and small commercial and industrial customers that do not pay a demand charge.

Xcel calculates the total test year authorized revenue requirement amount by using the test year energy charges, excluding Xcel's fuel clause or other riders, multiplied by test year sales for the corresponding customer group. Each month, Xcel calculates the RDM deferral for a customer group as the difference between the monthly baseline revenue and the revenue collected under the volumetric rates from those customers. Every 12 months, Xcel incorporates the cumulative deferral (over or under recovery) for each customer group into customer rates for the following year by dividing the deferral amount by the forecast of sales to that customer group.

In any year in which Xcel fails to achieve energy savings equal to 1.2 percent of retail sales, Xcel forgoes the opportunity to make an upward rate adjustment via the revenue decoupling mechanism in the following year. Xcel's RDM has a cap on surcharges equal to three percent of customer class revenues, excluding revenues from the fuel clause and other riders. In any year in which the revenue decoupling mechanism would authorize an upward adjustment to recover more than three percent of a customer group's base revenues (excluding consideration of Xcel's fuel clause or other riders), Xcel may implement a three percent adjustment. Xcel may also petition to use the following year's decoupling adjustment to recover costs excluded from recovery by this cap. In its petition, Xcel must demonstrate that Xcel's demand-side-management programs and other Company initiatives were a substantial contributing factor to the declining energy sales triggering the rate adjustment, and that other non-conservation factors were not the primary factors for the declining sales.

The Department's analysis of Xcel's 2018 Annual Report includes a review of:

- Xcel's ability to surcharge customers for 2018 deferrals;
- Xcel's compliance with Commission required reporting requirements;
- Xcel's 2018 Conservation Improvement Program (CIP) achievements, and
- Xcel's calculation of its deferrals for 2018.

The Department discusses each of these issues below.

B. XCEL'S ABILITY TO SURCHARGE CUSTOMERS

Order Point 40 c. of the Commission's May 8, 2015 Order in Docket No. E002/GR-13-868 states, in part:

> In any year in which Xcel fails to achieve energy savings equal to 1.2 percent of retail sales, Xcel will forgo the opportunity to make an upward rate adjustment via the revenue decoupling mechanism in the following year.

In its current filing, Xcel stated that preliminary results from its 2018 CIP portfolio showed energy savings of 666 million kWh, approximately 2.32 percent of retail sales. On April 1, 2019 Xcel filed its CIP Status Report in Docket No. E,G002/CIP-16-1105. Although its 2018 CIP Status Report has not yet been evaluated by the Minnesota Department of Commerce, Division of Energy Resources (Department), Xcel claimed 2018 first-year energy savings of 680,448,447 kWh, approximately 2.32 percent of its retail sales. Thus, Xcel is able to surcharge its applicable customers through its RDM Rider beginning in 2019.

C. XCEL'S REPORTING REQUIREMENTS

The Commission's Orders established annual report requirements[4] that Xcel addressed beginning on page 5 of its 2018 Report. The Department concludes that Xcel complied with its annual decoupling report filing requirements.

D. XCEL'S 2018 ENERGY SAVINGS

Minnesota Statutes § 216B.241, Subdivision 3 states:

> Subd. 3. **Pilot programs.** The commission shall allow one or more rate-regulated utilities to participate in a pilot program to assess the merits of a rate-decoupling strategy to promote energy efficiency and conservation. Each pilot program must utilize the criteria and standards established in subdivision 2 and be designed to determine whether a rate-decoupling strategy achieves energy savings. On or before a date established by the commission, the commission shall require electric and gas utilities that intend to implement a decoupling program to file a decoupling pilot plan, which shall be approved or approved as modified by the commission. A pilot program may not exceed three years in length. Any extension beyond three years can only be approved in a general rate case, unless that decoupling program was previously approved as part of a general rate case. The commission shall report on the programs annually to the chairs of the house of

[4] See Order Point 40 e requirements, numbers i through ix above, from Docket No. E002/GR-13-868.

representatives and senate committees with primary jurisdiction over energy policy.

The Department brings particular attention to the sentence in Subd. 3, which states, "Each pilot program must utilize the criteria and standards established in subdivision 2 and be designed to determine whether a rate-decoupling strategy achieves energy savings."

Xcel's RDM Rider applies to the Company's Residential and non-demand-metered Small General Service schedules, excluding lighting and electric vehicle services. Below in Table 5 the Department compares Xcel's 2018 (the third year of its RDM Rider deferral) CIP achievements, with the three years of the Company's pre-decoupling achievements. Table 5 and Figures 1 and 2 below show CIP achievements for the residential (including low-income) customer class and the business customer class (including the Center for Energy and Environment's (CEE) One-Stop Efficiency Shop).

Table 5: Xcel's 2018 CIP Achievements Compared to Pre-Decoupling (2013-2015) CIP Achievements

	Business	Residential	Total
2013	326,172,990	167,072,321	493,245,311
2014	342,313,567	136,265,278	478,578,845
2015	326,406,491	173,987,045	500,393,536
2013-2015 Average	331,631,016	159,108,215	490,739,231
2016	359,412,589	191,286,634	550,699,223
2017	463,172,254	192,898,330	656,070,584
2018	478,637,852	201,810,597	680,448,449
2018 % Difference from 2013-2015 Average	44%	27%	39%
2018 % Difference from 2017	3%	5%	4%

Figure 1: Comparing Xcel's 2018 Business First-Year Energy Savings to Average Pre-Decoupling (2013-2015) Business First-Year Energy Savings

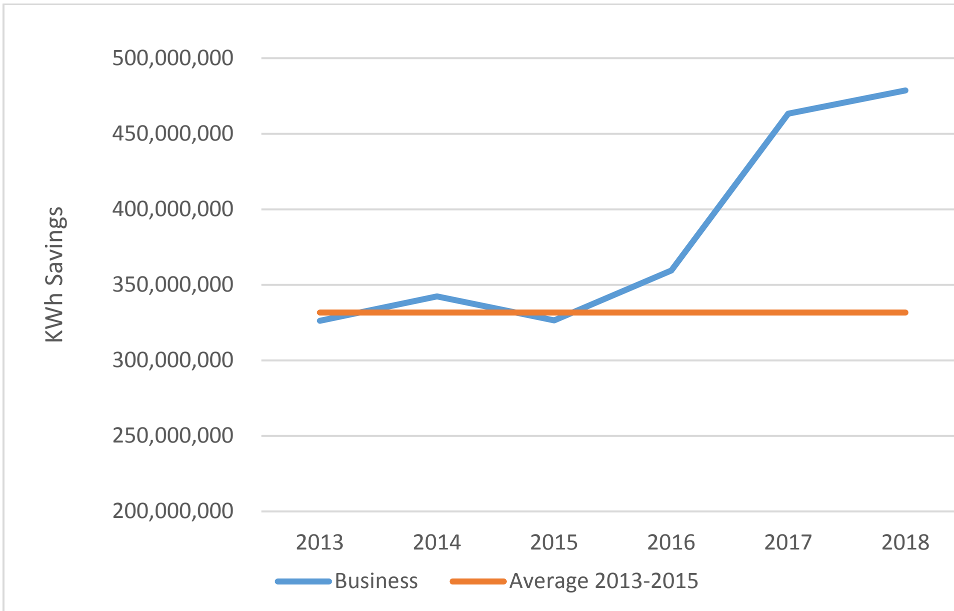
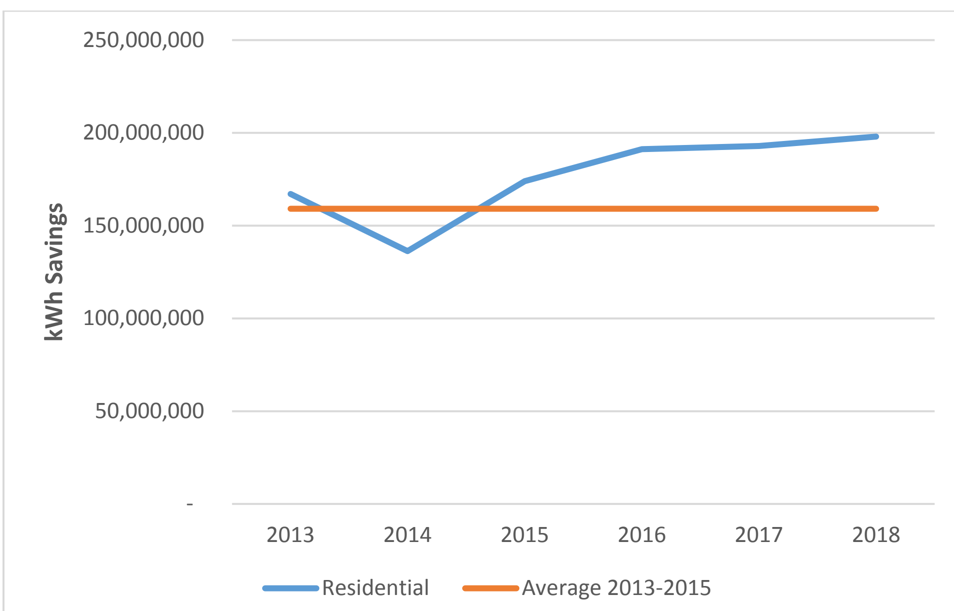


Figure 2: Comparing Xcel's 2018 Residential First-Year Energy Savings to Average Pre-Decoupling (2013-2015) Residential First-Year Energy Savings



Xcel did not provide CIP achievements for its non-demand-metered Small General Service customers separate from its much larger Business segment. However, a review of Table 5 and Figure 1 indicate that the Company's 2018 Business segment energy savings were one percent higher than the Company's 2017 Business segment savings and 41 percent higher than the average of its 2013-2015 Business segment energy savings. Xcel's 2018 Residential segment energy savings were three percent higher than the Company's 2017 Residential segment savings and 24 percent higher than the average of its 2013-2015 residential segment energy savings. Xcel's 2018 total energy savings were two percent higher than the Company's 2017 total energy savings and 36 percent higher than the average of its 2013-2015 total energy savings.

The Department concludes that the Company's increase in energy savings since the implementation of decoupling cannot be directly attributed to Xcel's decoupling pilot given that other state policies such as the Shared Savings DSM financial incentive mechanism were in place during 2018.

Regardless of the cause, the Department commends Xcel for its excellent 2018 results, its highest achievements to date.

E. XCEL'S CALCUATION OF ITS ANNUAL RDM RIDER FACTOR

Every 12 months, Xcel incorporates the cumulative deferral (over or under recovery) for each customer group into customer rates for the following year by dividing the deferral amount by the forecast of sales to that customer group. Table 4 below shows Xcel's calculation of its RDM factors for implementation between April 1, 2019 and March 31, 2020.

Table 6: Xcel's Calculation of its April 2019-March 2020 RDM Factors

	Residential Without Space Heating	Residential	Small General Service (non-demand)	Total
Under/(Over) Collection	($12,542,022)	($290,755)	($184,588)	($13,017,365)
Carry Over Balance	($684,676)	($139,710)	$166	($824,220)
Total	($13,226,698)	($430,465)	($184,422)	($13,841,585)
April 2019-March 2020 Sales*	8,137,868,546	407,767,340	864,133,606	NA
RDM Factor Surcharge/(Refund)	($0.001625)	($0.001056)	($0.000213)	NA

As can be seen in Table 6, Xcel calculated a refund for all three of its decoupled rate classes for April 1, 2019-March 31, 2020 due to overcollection of revenues in 2018. Based on our review, the Department concludes that Xcel correctly calculated its RDM factors.

F. DEPARTMENT RECOMMENDATIONS

The Department reviewed Xcel's calculations and concludes that the Company correctly calculated its RDM factors for implementation April 1, 2019 through March 31, 2020. The Department recommends that the Commission approve the RDM factors shown in Table 6 above.

/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. E002/M-19-127

Dated this 2nd day of April 2019

/s/Sharon Ferguson

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