

April 4, 2018

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

RE: **Corrected Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. E002/GR-13-868, E002/GR-15-826

Dear Mr. Wolf:

Attached are the *Corrected 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) 2017 Decoupling Annual Report.

The decoupling evaluation report was filed on February 1, 2018 by:

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

After filing Comments earlier today, the Department noted that we had incorrectly portrayed Xcel's proposal as a refund to its three revenue decoupling customer classes in Tables 2 and 4. These *Corrected Comments* show that the three customer classes will incur a *surcharge*, not a refund. The Department apologizes for the confusion created by its mistake.

The Department recommends that the Commission **approve Xcel's 2017 Annual Decoupling Report**. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ CHRISTOPHER T. DAVIS
Analyst Coordinator

CTD/lt
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. E002/GR-13-868, E002/GR-15-826

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 program¹ 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 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
- ix. Other factors that may have contributed to a decline in energy consumption, including weather and the economy.

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.

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 (\$/kWh)	Residential (\$/kWh)	Small General Service (non-demand) (\$/kWh)
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 based on its undercollection of funds in 2017 for the two residential and the small general service customer classes, 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 approximate overall \$27.1 million of undercollection due to a cooler than normal summer and warmer than normal winter.³

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.

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.

Table 2: Xcel's Calculation of its April 2018-March 2019 RDM Factors

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

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.

The total test year authorized revenue requirement amount is calculated 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 2017 Annual Report includes a review of:

- Xcel's ability to surcharge customers for 2017 deferrals;
- Xcel's compliance with Commission required reporting requirements;
- Xcel's 2017 Conservation Improvement Program (CIP) achievements, and
- Xcel's calculation of its deferrals for 2017.

Each of these issues is discussed below.

B. XCEL'S ABILITY TO SURCHARGE CUSTOMERS

Order Point 40 c. of the Commission's May 8, 2015 Order 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 2017 CIP portfolio showed energy savings of 656 million kWh, approximately 2.28 percent of retail sales. On April 2, 2018 Xcel filed its CIP Status Report in Docket No. E,G002/CIP-16-1105. Although its 2017 CIP Status Report has not yet been evaluated by the Minnesota Department of Commerce, Division of Energy Resources (Department), Xcel claimed 2017 first-year energy savings of 658,274,791 kWh, approximately 2.27 percent of its retail sales. Thus, Xcel is able to surcharge its applicable customers through its RDM Rider beginning in 2018.

C. XCEL'S REPORTING REQUIREMENTS

The Commission's Orders established annual report requirements⁴ that Xcel addressed beginning on page 5 of its 2017 Report. The Department concludes that Xcel complied with its annual decoupling report filing requirements.

⁴ See Order Point 40 e requirements, numbers i through ix above.

D. XCEL'S 2017 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 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 3 the Department compares Xcel's 2017 (the second year of its RDM Rider deferral) CIP achievements, with the three years of the Company's pre-decoupling achievements. Table 1 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 3: Xcel’s 2017 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
2017 % Difference from Average	40%	21%	34%
2017 % Difference from 2015	29%	1%	19%

Figure 1: Comparing Xcel’s 2017 Business First-Year Energy Savings to Average Pre-Decoupling (2013-2015) Business First-Year Energy Savings

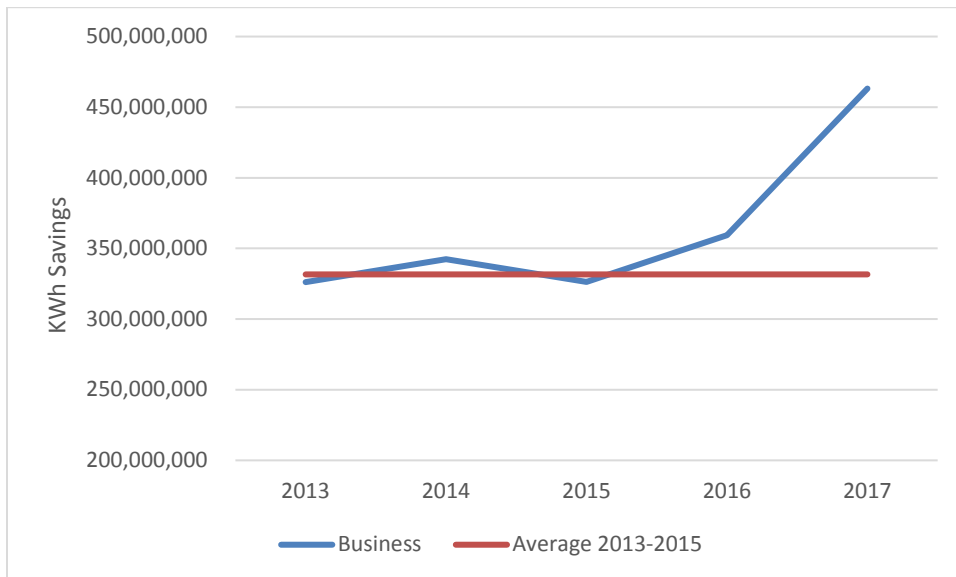
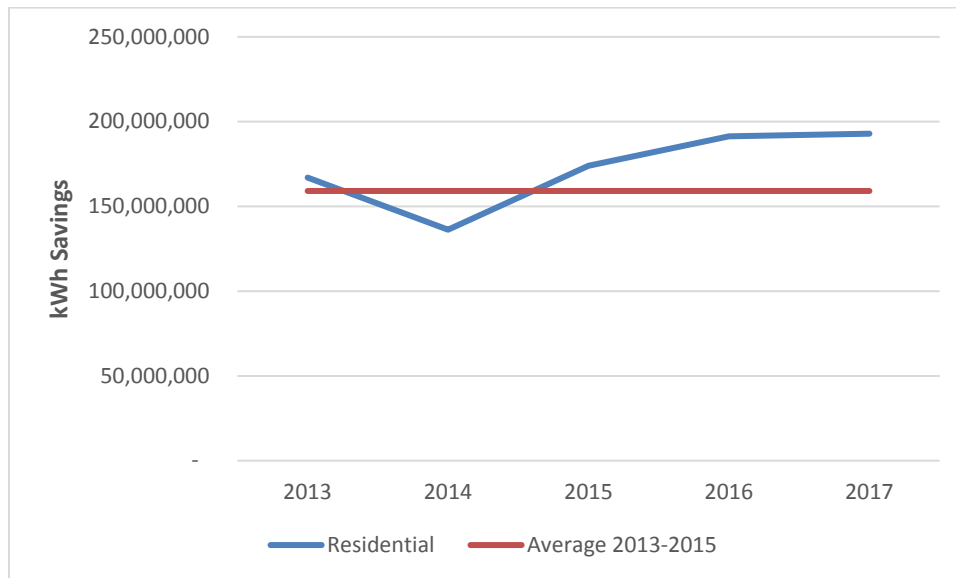


Figure 2: Comparing Xcel’s 2017 Residential First-Year Energy Savings to Average Pre-Decoupling (2013-2015) Residential First-Year Energy Savings



Xcel did not provide CIP achievements for its non-demand-metered Small General Service customers separate from its much larger Business segment. However, Table 3 and Figure 1 indicate that the Company’s 2017 Business segment energy savings were 29 percent higher than the Company’s 2016 Business segment savings and 40 percent higher than the average of its 2013-2015 Business segment energy savings. Xcel’s 2017 Residential segment energy savings were 1 percent higher than the Company’s 2016 Residential segment savings and 21 percent higher than the average of its 2013-2015 residential segment energy savings. Xcel’s 2017 total energy savings were 19 percent higher than the Company’s 2016 total energy savings and 34 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 2017.

Regardless of the cause, the Department commends Xcel for its excellent 2017 results, its highest achievements to date.

E. XCEL’S CALCULATION 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, 2018 and March 31, 2019. (On February 1, 2018, Xcel filed its 2017 Annual Decoupling Report with calculation of new RDM factors for April 1, 2018 through March 31, 2018).

Table 4: Xcel's Calculation of its April 2018-March 2019 RDM Factors

	Residential Without Space Heating (\$/kWh)	Residential (\$/kWh)	Small General Service (non- demand) (\$/kWh)
Under(Over) Collection in 2017	\$25,047,593	\$933,610	\$1,088,400
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RDM Factor— Surcharge/(Refund)	\$0.003064	\$0.002361	\$0.001245

As can be seen in Table 4, Xcel calculated a surcharge for all three of its decoupled rate classes for April 1, 2018-March 31, 2019 due to undercollection of revenues in 2017. 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, 2018 through March 31, 2019. The Department recommends that the Commission approve the RDM factors shown in Table 4 above.

/lt

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
Corrected Comments**

Docket No. E002/GR-13-868 and E002/GR-15-826

Dated this 4th day of April 2018

/s/Sharon Ferguson

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