

Staff Briefing Papers

Meeting Date	May 21, 2020	Agenda Item 3 **
Company	Northern States Power Company, doing business as Xcel Energy	
Docket Nos.	E-002/M-19-809 In the Matter of the Petition of Northern States Power Company for Approval of a Plan to Offer Generating Resources into the MISO Market on a Seasonal Basis. E-002/AA-19-293 In the Matter of the Petition of Northern States Power Company for Approval of the 2020 Annual Fuel Forecast and Monthly Fuel Cost Charges	
Issues	<ol style="list-style-type: none">1. Does the proposal by Xcel Energy to seasonally offer certain generation plants into the MISO market require Commission approval?2. Should the Commission authorize or preapprove any modifications to Xcel's 2020 fuel forecast reconciliation, in Docket No. E-002/AA-19-293?	
Staff	Robert Manning robert.manning@state.mn.us	651-201-2197
	Jason Bonnett jason.bonnett@state.mn.us	651-201-2235

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

 **Relevant Documents**

Date

Docket No. E-999/AA-18-373

PUC – Order

November 13, 2019

Docket No. E-002/M-19-809

Xcel - Plan to Offer Generating Resources into the MISO Market

December 20, 2019

PUC - Notice of Comment Period

January 10, 2020

PUC – Briefing Papers

February 19, 2020

Minnesota Power – Comments

March 31, 2020

Department of Commerce – Comments

April 1, 2020

Clean Energy Organizations – Comments

April 1, 2020

City of Minneapolis – Comments

April 1, 2020

Center for Energy and Environment – Comments

April 1, 2020

Xcel – Letter – Supplemental Information

April 1, 2020

Xcel – Reply Comments

April 16, 2020

Clean Energy Organizations – Reply Comments

April 16, 2020

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I. Statement of the Issues

1. Does the proposal by Xcel Energy to seasonally offer certain generation plants into the MISO market require Commission approval?
2. Should the Commission order any modifications to Xcel's 2020 fuel forecast reconciliation?

II. Introduction

On November 13, 2019, the Commission issued its Order¹ opening an investigation into the use of non-economic dispatch by baseload facilities.² Xcel analyzed its usage of baseload facilities and found that it would be economic to transition to a seasonal dispatch plan for two of its units, Allen S. King Generating Station (King or the King Plant) and Unit 2 of the Sherburne County Generating Station (Sherco 2). Xcel is requesting authorization from the Commission to transition these two plants to a new dispatch schedule and allow for true-up of the difference between the costs in its approved 2020 fuel forecast, which is based on year-round generation at those facilities, and actual fuel costs related to the change to seasonal deployment of these facilities.

III. Xcel Proposal - Xcel Seasonal Dispatch Plan - Docket No. E-002/M-19-809

On December 20, 2019, Xcel Energy filed its Plan to Offer Generating Resources into the MISO Market on a Seasonal Basis, in Docket No. E-002/M-19-809. In this filing, Xcel laid out its plan to offer the Allen S King Generating Station (King) and Unit 2 of the Sherburne County Generating Station (Sherco 2) into the MISO market on a seasonal basis. This plan calls for Xcel to suspend normal operations during non-peak seasons at King as soon as March 2020, and at Sherco 2 as soon as September 2020. During these periods, Xcel would operate King and Sherco 2 only if required for reliability.

Xcel also requested permission to true-up fuel costs in 2020, which may differ from Xcel's initial 2020 Fuel forecast as approved in Docket No. E-002/AA-19-293 due to the change in plant usage. According to Xcel, switching from year-round economic dispatch to seasonal economic dispatch should result in significant savings to ratepayers from lower operating and maintenance (O&M) and capital costs, but may increase fuel costs slightly. Xcel is requesting permission to true up any increased fuel costs that may arise through the fuel clause and is silent with respect to the estimated cost savings.

¹ ORDER ACCEPTING 2017-2018 ELECTRIC REPORTS AND SETTING ADDITIONAL REQUIREMENTS, *In the Matter of the Review of the 2016-2017 Annual Automatic Adjustment Reports for All Electric Utilities*, Docket No. E-999/AA-17-492, and *In the Matter of the Review of the 2017-2018 Annual Automatic Adjustment Reports for All Electric Utilities*, Docket No. E-999/AA-18-373 (November 13, 2019)

² Notice of Comment Period, *In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities*, Docket No. E-999/CI-19-704 (December 13, 2019)

Xcel developed a unit commitment plan for King and Sherco 2 which calls for these plants to be idled during the months of March, April, May, September, October, and November, for the years 2020, 2021, and 2022. King could start this plan in March 2020, Sherco 2 in September 2020. The idled plants would be available for restart if there is a need for system reliability or other critical activity.

Xcel used PLEXOS to model the NSP power supply system and forecast costs for fuel and purchased energy, updating their fuel forecasts from Docket No. E-002/AA-19-293. This model found significant savings through transitioning from must commit to economic commit for Sherco 2 and King, and Xcel implemented economic commitment for these plants in 2019. Xcel then modeled Seasonal economic commitment with idling during the shoulder months vs. year-round economic commitment. The modeling, based on projected fuel markets, found little change in fuel costs, with a maximum projection of approximately \$1 million in increased fuel costs in 2020, and a minimum projection of a savings of \$184 in ideal conditions in 2023. Unexpected market conditions could either increase or decrease these estimates. These costs would be offset by an estimated \$2 million to \$4.8 million in annual O&M savings for 2020-2023.

Table 1 – Change in Costs – Must Run vs. Economic Commitment vs. Seasonal Commitment³

(millions of dollars)	2020	2021	2022	2023
Economic Commit vs Must Run				
Fuel Clause Costs – Economic Commit vs Must Run	(\$4.676) – (\$9.227)	(\$9.056) – (\$19.061)	(\$14.992) – (\$28.794)	(\$10.173) – \$22.727)
Seasonal Commit vs Economic Commit				
NSPM Fuel Clause Costs – Seasonal vs Economic	\$0.597 – 1.067	\$0.126 – \$0.433	\$0.152 – \$0.704	(\$0.184) – \$0.574
Projected O&M Costs – Seasonal vs Economic	(\$2.050)	(\$4.880)	(\$3.100)	(\$3.300)
Projected Capital Costs – Seasonal vs Economic	\$0	(\$0.418)	(\$2.445)	(\$3.488)

Table 2 – Reduction in Carbon Emissions⁴

Carbon Impact (millions of tons)	2020	2021	2022	2023
Economic Commit vs Must Commit	(3.2)-(3.6)	(3.7)-(4.4)	(4.8)-(5.5)	(5.2)-(6.3)
Seasonal vs Economic Commit	(0.2)-(0.5)	(0.1)-(0.7)	(0.1)-(0.3)	(0.2)-(1.0)

Xcel asserts that the unit commitment plan will not result in a reduction of Company employees. Xcel’s business plan anticipates incorporation of a reduction in employees via attrition as Xcel prepares to cease operations at its coal plants.

Xcel proposes to add an analysis of the hours King or Sherco would have been committed if offered into the MISO day ahead market as part of an analysis of the impact of this plan on

³ Xcel Table 2, 3, 4, 5, and 6, pp. 10-12.

⁴ Xcel Table 7, 8, and 9, p. 13.

an annual basis as part of the reporting required in the November 13, 2019 Order in Docket E999/AA-18-373. Xcel explained that the Unit Commitment Plan could be modified or expanded if it can be found that it would be in the best interest of customers, as a result of this analysis.

Xcel requests approval of the following:⁵

- Our Unit Commitment Plan to operate King and Sherco 2 on a seasonal basis.
- Flexibility in implementing our Unit Commitment Plan to restart units if there is a need for system reliability or other critical activity.
- In addition to the specific reporting requirements in the Commission's November 13, 2019 Order in Docket No. E-999/AA-18-373, the Company will provide additional analysis of the impacts of our Unit Commitment Plan on an annual basis, including an analysis of the hours King or Sherco 2 would have been committed if offered into the MISO day-ahead market.
- The ability to true-up 2020 fuel costs that may differ from our initial 2020 fuel forecast in Docket No. E-002/AA-19-293 to reflect the change in commitment of King and Sherco 2.

IV. Parties' Comments

On January 10, 2020 Commission issued its Notice of Comment Period in this docket establishing April 1, 2020 as the deadline for initial comments, April 16, 2020 as the deadline for reply comments.

This docket was noticed for the February 27, 2020 Commission meeting so that Xcel and potentially interested parties have an opportunity to provide an update on the status of Xcel's plan and the inquiries into Xcel's proposal, and for Commissioners to ask any questions they may have at this time about Xcel's plan.

On March 31, 2020 and April 1, 2020, the Center for Energy and the Environment (CEE), Xcel Energy (Xcel), Clean Energy Organizations (CEO), Minnesota Power (MP), City of Minneapolis (City), and the Department of Commerce, Division of Energy Resources (Department) filed initial comments on the proposal. On April 16, 2020, Xcel and CEO filed reply comments.

A. Department of Commerce

The Department of Commerce, Division of Energy Resources appreciates that Xcel Energy has been exploring ways to minimize fuel costs and reduce use of carbon-intensive resources. The Department believes that Xcel has adequate leeway as to its strategies for bidding resources into the wholesale market, and so recommends that the

⁵ Ibid. p. 13-14.

Commission take no action on the proposed unit commitment plan, and either deny preapproval or take no action on Xcel's proposed true-up of fuel costs.

The Department argues that the fact that Xcel has already adjusted from "Must Run" commitment to Economic commitment without needing Commission approval demonstrates that the company has adequate authority to adjust its operations to best utilize its resources for ratepayers, and in fact is required to operate its system efficiently. Xcel already has to operate under Federal Energy Regulatory Commission (FERC) rules and Midcontinent System Operator (MISO) guidelines, so adding further complexity in directing Xcel's operations is best avoided by the Commission.

The Department finds that both seasonal commitment and economic commitment are superior to Must-Run commitment for these two plants, based on Xcel's analysis. However, the Department argues that the differences between seasonal and economic commitment in both cost and carbon emission values are small enough as to likely be within the margin of error of the analysis.

The Department notes that this proceeding appears to have been prompted by the proceeding in Dockets E-999/CI-19-704 and E-999/AA-18-373, where the Commission is investigating the scheduling practices of baseload generation. The Department states:

The Department expects that utilities, including Xcel, should manage their systems, including commitment strategy, in a reasonable manner. Xcel is expected to minimize costs to the extent possible while maintaining system reliability. Xcel's switch from must-run commitment to either economic or seasonal commitment appears to be the result of Xcel's efforts to do what is expected and does not require Commission approval. Therefore, the Commission need not take any action on the proposed Unit Commitment Plan.⁶

The Department also opposes pre-approval for true-up of fuel costs that differ from those approved in Xcel's 2020 forecasted fuel-clause, in Docket No. E-002/AA-19-293. Instead, the Department recommends that any future true-ups of Xcel's 2020 fuel costs follow the processes laid out in the Commission orders in the fuel-clause reform docket.⁷ The Department notes that Xcel's petition, in this docket (#19-809), contains

⁶ Department of Commerce, Comments of April 1, 2020, p. 6.

⁷ ORDER APPROVING NEW ANNUAL FUEL CLAUSE ADJUSTMENT REQUIREMENTS AND SETTING FILING REQUIREMENTS (December 19, 2017), ORDER REVISING IMPLEMENTATION DATE, ESTABLISHING PROCEDURAL REQUIREMENTS, AND VARYING RULE (December 12, 2018), ORDER APPROVING ADDITIONAL DETAILS OF NEW FUEL CLAUSE ADJUSTMENT PROCESS (June 12, 2019), *In the Matter of an Investigation into the Appropriateness of Continuing to Permit Electric Energy Cost Adjustments*, Docket No. E-999/CI-03-802

no proposed adjustments to rates, and so the Commission can rely on the standard tools of rate regulation and consider the reasonableness of costs in the proceeding in which the cost data, and the associated support, is available to do so.

In summary, the Department recommends:

- The Commission need not take any action regarding Xcel's dispatch decisions in this proceeding.
- The Commission either deny or take no action on Xcel's request in this proceeding for pre-approval to true-up its 2020 fuel costs that differ from those approved in Xcel's forecasted fuel-clause proceeding, in Docket No. E-002/AA-19-293.

B. Comments of other Parties

1. Center for Energy and the Environment (CEE)

CEE commends Xcel for proposing to operate King and Sherco 2 on a seasonal basis and recommends approval of this petition. CEE recognizes the uncertainty this plan presents, and that it is the first time a Minnesota electric utility will shift baseload to a seasonal schedule.

CEE appreciates the reporting Xcel has committed to providing, and hopes that the additional data will help other utilities explore opportunities to optimize the usage of their fleets. CEE requests that Xcel quantify and discuss the effect of seasonal operations on marginal energy costs, and notes that this plan may place thermal resources on the margin in more hours of the year than otherwise. This might affect marginal energy costs, and thus avoided marginal energy costs for energy efficiency and other distributed energy resources.

CEE also recommends approval of the request for preapproval to true-up currently approved 2020 fuel forecast during the March 1, 2021 fuel forecast true-up report. So long as the Commission determines that the company has acted prudently to manage costs, the Commission should allow Xcel to recover additional fuel costs associated with seasonal operation of King and Sherco 2, and Xcel customers should receive the benefit if these operations reduce fuel costs for 2020.

2. Clean Energy Organizations

CEOs appreciate the Xcel proposal, and recommend approval of the plan. CEOs also requests additional reporting from Xcel, beginning within 6 months of the order date in this docket, to be cross-filed in this docket and Docket No. E-999/CI-19-704, and updated in CI-19-704 annually. CEO recommends these reports include:

- A comparison of actual fuel charge impacts, O&M cost savings, capital expenditure savings, and actual emissions versus the modeling results (estimated) presented in this filing.
- Reporting on the operations of each unit in each quarter of the reporting period including offline days for reserve shutdown or outage, starts by type (MISO economic, MISO reliability dispatch, Company must run), and the duration of each start by type.
- An analysis of the hours King or Sherco 2 would have been committed during non-peak seasons if offered into the MISO day-ahead market on an economic commit and must run basis.
- Actual workforce impacts at each unit.

CEOs note that Xcel’s plan would reduce emissions and generate savings for customers, and so should be approved.

3. City of Minneapolis

City of Minneapolis states that it is participating in this proceeding to support transition to a clean, reliable, and affordable energy system for the benefit of its residents and businesses. Minneapolis believes Xcel’s petition and the related self-commitment/self-scheduling docket create opportunities to identify how current and planned practices combine to optimize generation assets that lead to lower total system costs and increased renewable energy. Minneapolis is encouraged that Xcel plans to “look for opportunities to expand seasonal operations to include other generation facilities or longer periods when units are idled” and believes this will support economically efficient outcomes with additional savings and pollution reduction.

Minneapolis generally supports Xcel’s proposal because it will result in:

- Significant customer cost savings
- Significant criteria pollution and greenhouse gas reductions
- A fairer wholesale electricity market.

Minneapolis suggests that the reporting proposed by Xcel contain more granular analysis of actual cost savings by category, including O&M, Energy, Labor, Fuel, etc. Minneapolis also requests that reporting be done by month rather than being summarized at an annual level.

Minneapolis notes that, in response to discovery, Xcel suggested that “instead of implementing any changes to the 2020 fuel forecast, we propose to examine the impacts, report the findings to the Commission, and true-up for actual fuel costs when we file the March 1, 2021 fuel forecast true-up report”. Minneapolis asks that

the forecast instead be adjusted as soon as practical to offer customers financial relief.⁸

4. Xcel Comments

Xcel provided supplemental comments on March 1, 2020 to offer responses to questions raised during the February 27, 2020 Agenda Meeting.

Xcel states that during seasonal operations, there will be no reduction in plant employees, and every employee will be able to work a full 40-hour work week. However, need for overtime will likely be reduced at each impacted site, and each site will evaluate workload and make business decisions based on the amount of work needed.

The seasonal commitment plan proposes to idle the plants during the spring and fall 'shoulder' seasons, a time of year when overhauls are performed at many of Xcel's facilities. If the business need requires additional employees, Xcel would seek volunteers to support overhaul work at other sites where additional workers are needed, and these employees are likely to have the opportunity to earn overtime pay. Xcel will comply with all union rules regarding employee travel, and notes that COVID-19 may change how employees are utilized in the near term.

Xcel states that management has communicated to employees the likelihood that coal plants may shut down before expected plant retirement dates. This communication has come through plant meetings, small group meetings, individual discussions, and emails.

5. Minnesota Power

With respect to the true-up of forecasted fuel costs, Minnesota Power notes that the June 12, 2009 Order, in Docket No. E-999/CI-03-802, regarding Fuel Clause Adjustment Reform, the Commission directed the following:

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.

And

⁸ Staff notes that Xcel, in its April 23, 2020 petition, *In the Matter of Northern States Power Company d/b/a Xcel Energy's Proposed Adjustment to the 2020 Annual Fuel Forecast and Monthly Fuel Cost Charges*, Docket Nos. E-002/AA-19-293 and E-002/M-20-43, requested permission to reduce fuel cost charges for the months of June through August 2020 by \$25 million.

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.

Minnesota Power believes that adjustments or true-ups to the approved fuel forecast should be handled in the related fuel-forecast dockets, and that the two listed order points above provide the avenue for possible adjustment and tracking of under or over-collection.

C. Reply Comments

1. CEO

CEOs provided reply comments on March 16, 2020 to rebut the Department's recommendations. CEO agrees that Xcel is obligated to operate its system efficiently and can change bidding strategy to achieve lower costs for customers without approval. CEO disagrees, however, that Commission action in this docket would introduce complexity. FERC and MISO have voiced no concerns with this docket or with Commission jurisdiction.

CEOs also disagree with the Department that seasonal dispatch is necessarily less efficient than economic dispatch. CEOs believe that the Department is neglecting the inefficiency in the bidding process in the MISO day ahead market in that it doesn't properly consider all costs such as incremental operations and maintenance costs needed to keep the plant available for dispatch on a day-to-day basis. CEOs note that Xcel's analysis suggests \$51.5 million in O&M and capital savings over 9 years from transitioning to the seasonal approach. CEOs maintain their recommendations to:

- Approve Xcel's petition and unit commitment plan.
- Require Xcel to provide, as recommended in their initial comments and described above on page five, an initial report within 6 months of the Commission Order in this docket and Docket 19-704, with annual updates in Docket 19-704.

2. Xcel Reply Comments

Xcel agrees with the Department that the difference between seasonal dispatch and economic dispatch is small, however, Xcel asserts that seasonal dispatch provides more certainty in plant operations, which is beneficial to managing the investment at the plants through their planned retirement dates.

Xcel accepts the Department's position that it is premature to override the newly established fuel forecast process or to adjust the 2020 fuel costs to reflect the Unit Commitment Plan at this time. Xcel anticipates that true-up of fuel costs will happen as part of the fuel forecast process at the conclusion of the 2020 forecast year. Xcel intended to alert parties to the risk that 2020 actual fuel costs could be higher than anticipated due to the plan, and to solicit feedback prior to implementation. Xcel expects the new true-up process to provide the flexibility necessary to justify variations in fuel charges at the conclusion of the forecast year.

Xcel believes that annual reporting will allow parties and the Commission to review the impact of the plan considering a full year of data. Month to month variations may not provide an accurate view of the annual impacts. Xcel recommends that the Commission direct them to work with parties to make sure Xcel can provide the appropriate data for full analysis, instead of ordering Xcel to fulfill specific reporting requirements.

V. Staff Analysis

Staff appreciates Xcel's proposal to seasonally dispatch King and Sherco 2. This plan advances customer interest, environmental efficiency, and appears to improve the efficiency of the Xcel generation usage. Staff does not believe Xcel necessarily requires Commission approval to make these changes to plant operations, and agrees with the Department that Xcel both has the authority and the duty to operate their facilities in manner most economical for ratepayers.

Staff believes it is not necessary to re-open the annual fuel forecasts, and that the fuel cost true-up as part of the existing process will allow both ratepayers and Xcel to be made whole for the differences between the existing fuel forecast and actual fuel costs reflecting the actual operation of the plants. Staff recognizes that fuel forecasts are just that, forecasts, and that changing market conditions, identification of opportunities for increased efficiency by utilities in plant operations, and unforeseen events such as unscheduled outages or changes in load due to events such as weather or COVID-19 will necessarily cause utility fuel usage to vary from forecast levels, subject to Commission review for prudence. The Commission and parties will have adequate opportunity to review fuel usage and costs during the true-up process at the end of the forecast year.

Staff does believe, however, that it may be in the public interest for the Commission to approve this plan and establish reporting requirements around it, to provide additional data for the Commission, utilities, and interested parties to identify additional opportunities to improve the efficiency of utilities' usage of their generation fleets for both cost efficiency for ratepayers and environmental efficiency in emissions reductions and proper balance of the generation fleet across the market.

VI. Decision Alternatives

Petition for Seasonal Deployment

1. Approve Xcel's proposed plan for seasonal deployment of the King and Sherco 2 facilities. (Xcel, CEOs, CEE, Minneapolis)

OR

2. Take no action on Xcel's proposed plan for seasonal deployment, as the change does not require Commission approval. (Department)

OR

3. Deny Xcel's proposed plan for seasonal deployment of the King and Sherco 2 facilities.

Fuel Costs

4. Approve Xcel's request for preapproval to true-up fuel costs for 2020 as part of the fuel forecast process at the conclusion of the 2020 forecast year. (Xcel Reply Comments)

OR

5. Require Xcel to adjust its forecasted 2020 fuel costs, as approved in Docket No. 19-293, to reflect the Company's unit commitment plan. Require Xcel to submit a compliance filing with its proposed adjustments within 30 days of the Commission's order in this docket. Request comments from parties on Xcel's compliance filing within 10 days. (Minneapolis, modified)

OR

6. Deny Xcel's request for pre-approval of true-up of fuel cost differences due to the seasonal deployment plan. (Department Alternative)

OR

7. Take no action on fuel costs in this docket. (Department Alternative)

Reporting Dates

8. Require Xcel to provide an analysis of the impact of its unit commitment plan annually with the reporting required by the Commission's November 13, 2019 Order⁹ in the Commission's investigation into self-commitment and self-scheduling of large baseload generation facilities.¹⁰ (Xcel)

OR

9. Require Xcel to provide analysis of the impact of the unit commitment plan within 6 months of the Commission order in this docket and in the Commission's investigation into self-commitment and self-scheduling of large baseload generation facilities docket (Docket No. 19-704),¹¹ and annually thereafter in Docket No. 19-704. (CEOs)

OR

10. Take no action regarding reporting. (Department)

Reporting Requirements

11. Require Xcel to include in its reports and analysis, an Analysis of hours each plant would have been committed if offered into the MISO day-ahead market under both must commit and economic commit plans. Require Xcel to work with all parties to make sure Xcel can provide parties with the appropriate data for full analysis. (Xcel)

OR

12. Require Xcel to include in its reports a Comparison of cost and revenue from both Must Commit and Economic Commit to actual costs and revenues from the seasonal commitment plan and to the models presented in Xcel's filing. This should include:
 - a) A comparison of actual fuel costs, O&M costs, and capital costs for seasonal commitment, and estimated fuel costs, O&M costs, and capital costs for must commit and economic commitment. It should also include an analysis of

⁹ ORDER ACCEPTING 2017-2018 ELECTRIC REPORTS AND SETTING ADDITIONAL REQUIREMENTS, *In the Matter of the Review of the 2016-2017 Annual Automatic Adjustment Reports for All Electric Utilities*, Docket No. E-999/AA-17-492, and *In the Matter of the Review of the 2017-2018 Annual Automatic Adjustment Reports for All Electric Utilities*, Docket No. E-999/AA-18-373 (November 13, 2019)

¹⁰ *In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities*, Docket No. E-999/CI-19-704

¹¹ Ibid

- emissions savings due to the plan relative to Must Run and Economic Commitment. (CEOs)
- b) Reporting on operations of each unit in each quarter, including offline days, starts by type (MISO Economic, MISO reliability, Company must run) and duration of each start by type. (CEOs)
 - c) Actual workforce impacts at each unit. (CEOs)
13. Require that Xcel's reporting on savings be reported by category (O&M, Energy, Labor, etc.) and that reported savings be summarized at a monthly, rather than annual level. (Minneapolis)
14. Require Xcel to include in its reporting an analysis of marginal energy costs, and whether the plan increases marginal energy costs for attribution of savings to energy efficiency and other distributed energy purposes. (CEE)
15. Take any other action as determined by the Commission.