

August 1, 2018

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

RE: Northern States Power Company D/B/A Xcel Energy's Annual Report on the Operation and Performance of Its 2017 Incentive Compensation Plan Pursuant to MPUC Orders After Reconsideration

Docket Nos. E002/GR-92-1185; G002/GR-92-1186; and E,G002/M-18-121

Dear Mr. Wolf:

On May 31, 2018, Northern States Power Company d/b/a Xcel Energy (Xcel Energy or the Company) filed its annual incentive compensation compliance report for the year 2017 (the 2017 Incentive Compensation Annual Compliance Report, or 2017 Report) pursuant to the Minnesota Public Utilities Commission's (Commission) *Order After Reconsideration* dated January 14, 1994 in Docket No. E002/GR-92-1185 and dated December 30, 1993 in Docket No. G002/GR-92-1186. The Commission's Ordering paragraphs 2 and 3 relate to Xcel Energy's electric and gas utilities' incentive compensation. Ordering paragraph 3 requires that:

The Company shall file a report on or before April 1, 1995^[1] and annually thereafter evaluating the operation and performance of its incentive compensation plan. The report shall include, but shall not necessarily be limited to, an accounting of all amounts paid under the plan, an accounting of all amounts recorded as earned but not paid, and an evaluation of the plan's success in meeting its stated goals, including controlling overall compensation costs.

Ordering paragraph 2 requires that "The Company shall record for future refund all incentive compensation payments earned under the terms of the plan and recoverable in rates under this Order but not paid." The Commission noted that if the Company included such costs in rates but later did not

¹ The Commission approved a later filing date in its March 27, 2002 Order. The Order required "that the incentive compensation report will be due on May 31, 2002, and annually thereafter." Xcel Energy requested a later filing date since it changed the date that incentive compensation payments are made from February 1 to March 15.

make incentive payments, such circumstances would be seen “as an inappropriate transfer of risk from shareholders to ratepayers and as inconsistent with the test year concept on which rates are based.”²

In its 2017 Report, Xcel Energy explained that, based on performance for the year 2017, the amount of incentive compensation paid in 2017 was more than the amount included in base rates as identified on Attachment C to Xcel Energy’s Compliance Report. The Minnesota Department of Commerce, Division of Energy Resources (Department or DOC) reviewed documents from the appropriate rate cases, and verified that the incentive compensation included in current rates for the electric utility is \$19,978,122 and for the gas utility is \$927,885. However, the Department concludes that Xcel Energy used the wrong comparison in support of the Company’s assertion that it does not have unpaid earned incentive compensation that exceeds the amount recoverable in base rates, as it relates to the electric utility.

As the Commission concluded at its July 19, 2018 Agenda Meeting regarding Docket No. E,G002/M-17-429 (the 17-429 docket), the more appropriate comparison is between the “amount eligible for recovery (excluding AIP [Annual Incentive Plan] over 15 percent of base pay)” and the “amount approved in base rates.” Using information provided in Attachment C to the Company’s 2017 Incentive Compensation Annual Compliance Report, and following the methodology approved by the Commission in its recent decision in the 17-249 docket, the “amount eligible for recovery (excluding AIP over 15 percent of base pay)” from electric ratepayers in 2017 was \$18,020,500. When compared to the \$19,978,122 amount approved in base rates, there is a ratepayer refund due of \$1,957,622. A similar comparison for the gas utility shows that there is no ratepayer refund to the gas ratepayers for the year 2017.

The Company explained that the Incentive Compensation Program for 2017 was based on two performance components, Corporate and Individual:

- The Corporate Scorecard Key Performance Indicators (KPIs) include, among other metrics, reliability, customer loyalty and employee safety; and
- Individual:
 - A) Year-end award individual contributions and performance that can be aligned to individual performance goals as determined by the manager,
 - B) I Deliver Award, and
 - C) Innovator Award.

² See page 7 of the *Order After Reconsideration* dated January 14, 1994 in Docket No. E002/GR-92-1185 and dated December 30, 1993 in Docket No. G002/GR-92-1186.

The Department notes that the “I Deliver Award” and the “Innovator Award” appear to be new to the AIP. Xcel Energy indicated that the business unit level component was discontinued.³ As explained in the Company’s 2017 Incentive Compensation Annual Compliance Report, the 2017 Plan was modified to include a real-time incentive opportunity for exceptional individual and team performance, while using the same overall incentive budget. According to the Company, there is no additional cost impact to ratepayers.

The Department surmises that the reason there is no additional cost impact to the ratepayers, is that the cost to ratepayer component can only change during a rate case. Thus, any specific recovery in rates of the new “I Deliver Award” and the “Innovator Award” will be determined in a future rate case. The Department notes that the last paragraph in Attachment A, Page 5 of 11 of the 2017 Report states:

There is no maximum payout restriction for the I Deliver and Innovator Awards. That could result in an employee earning a total annual incentive payout greater than 150 percent of their incentive target by earning one or more of these awards based on superior contributions and performance.

As the Company explained in its 2017 Report,

We believe that our compensation philosophy and continuing commitment to the goals of the Plan have positively impacted the following important parts of our business:

- Our ability to attract, retain and motivate valued employees. The incentive compensation component is part of the employee’s total compensation and is considered when deciding on employment either as a new recruit or in evaluating other employment opportunities.
- Lowers the cost of our overall compensation by providing an important control that links total compensation to business results.
- Incentivizes strong employee performance, process improvements and innovation, as employees strive to earn incentive pay by delivering appropriate levels of customer service, reliability, and safety results.

The Department recommends that the Commission accept the Company’s 2017 Annual Report as being compliant with the Commission’s Order, with one exception. The Company must refund to electric ratepayers \$1,957,622, as a result of over-recovering the amount eligible for recovery, as shown in DOC Attachment A. In future annual reports, the Department will continue to review the results of the Incentive Compensation Plan and to evaluate the plan itself.

³ 2017 Report, page 2

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The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ DALE V. LUSTI
Financial Analyst

DVL/ja

**Northern States Power Company
DOC Review of Annual Incentive Compensation Plan Reports
For the Years 2016 through 2017**

Line No.	<u>Year</u>		2017 Total	2017 Electric	2017 Gas
1	2017	AIP paid, State of MN Jurisdictional amount	23,815,334	22,658,072	1,157,262
2	2017	Amount eligible for recovery. Excludes AIP over 15% of base pay	18,979,850	18,020,500	959,351
3	2017	Amount approved in base rates	20,906,007	19,978,122	927,885
4	2017	Percent recovered [Lines (3) / (1)]	87.8%	88.2%	80.2%
5	2017	Ratepayer refund [Lines (3) - (1). If negative, show 0. DOC calculation of the potential ratepayer refund [Lines (3) - (2). If	-	-	-
6	2017	negative, show 0. 2/	1,957,622	1,957,622	-
Line No.	<u>Year</u>		2016 Total	2016 Electric	2016 Gas
7	2016	AIP paid, State of MN Jurisdictional amount	23,774,717	22,443,649	1,331,068
8	2016	Amount eligible for recovery. Excludes AIP over 15% of base pay	19,237,706	18,114,695	1,123,011
9	2016	Amount approved in base rates	20,321,236	19,393,351	927,885
10	2016	Percent recovered [Lines (9) / (7)]	85.5%	86.4%	69.7%
11	2016	Ratepayer refund [Lines (9) - (7). If negative, show 0. DOC calculation of the potential ratepayer refund [Lines (9) - (8). If	-	-	-
12	2016	negative, show 0. 2/	1,278,656	1,278,656	-

1/ All information is per the Xcel Energy Annual Incentive Compensation Plan Reports filed for the years 2016 and 2017.

2/ The total refund is the sum of the electric refund and gas refund, if any.

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/GR-92-1185; G002/GR-92-1186; and E,G002/M-18-121

Dated this **1st** day of **August 2018**

/s/Sharon Ferguson

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