COMMERCE DEPARTMENT

April 22, 2021

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. E002/GR-20-723 and E002/M-20-743

Dear Mr. Seuffert:

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

In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in the State of Minnesota

In the Matter of the Petition of Xcel Energy for Approval of 2021 True-Up Mechanisms

The Petition was filed on September 15, 2020 by:

Greg P. Chamberlain
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
greg.p.chamberlain@xcelenergy.com

The Department recommends that the Minnesota Public Utilities Commission (Commission) **consider the comments of the Department in response to the Commission's April 2, 2021 Notice of Comment Period**. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ NANCY CAMPBELL
Financial Analyst Coordinator, CPA

NC/ja
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket Nos. E002/GR-20-723 and E002/M-20-743

I. INTRODUCTION

On September 15, 2020, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed a proposal (True-Up or Stay Out Proposal) to extend its 2020 true-ups, approved in Docket No. E002/M-19-688, for one additional year.[1] Xcel stated that upon Commission approval of the True-Up Proposal, Xcel would withdraw its multi-year rate plan (MYRP) filed on November 2, 2020.[2]

On December 30, 2020, the Commission issued its *Order Suspending Rates and Staying Petition* in the 2021 Rate Case.

On March 3, 2021, Xcel filed a letter (Xcel's March 3, 2021 Letter) in its 2021 Rate Case and 2021 Stay Out Proposal, indicating the Company had made a $43.2 million error in its initial filing in the 2021 Rate Case by inadvertently included certain expenses related to gas demand twice. As a result of this error Xcel's revenue requirement deficiency for 2021 test year and proposed 2021 interim rates were overstated by $43.2 million.

On March 8, 2021, the Xcel Large Industrials (XLI) filed a letter responding to Xcel's $43.2 million error.

On April 2, 2021, the Commission issued its *Order Approving True-Ups with Modifications and Requiring Xcel to Withdraw Its Notice of Change in Rates and Interim Rate Petition.*

On April 2, 2021, the Commission also issued a *Notice of Comment Period* (Commission's April 2, 2021 Notice) asking parties to file comments by April 22, 2021 on the following topics:

- Does the information contained in Xcel's March 3, 2021 letter materially change the Commission's rationale for approving Xcel's 2021 True-up Proposal? If so, how?
- Should the Commission reconsider its approval of Xcel's 2021 True-up Proposal and require Xcel to instead proceed with its rate case?
- Are there other issues or concerns related to this matter?

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[1] In the Matter of the Petition of Xcel for Approval of the 2021 True-Up Mechanisms in Docket No. E002/M-20-743.

[2] In the Matter of the Application of Xcel for Authority to Increase Rates for Electric Service in the State of Minnesota in Docket No. E002/GR-20-723 (2021 Rate Case).

II. DEPARTMENT ANALYSIS

The Department reviewed Xcel's March 3, 2021 Letter and, below, addresses the three topics open for comment listed in the Commission's April 2, 2021 Notice.

A. Does the information contained in Xcel's March 3, 2021 letter materially change the Commission's rationale for approving Xcel's 2021 True-up Proposal? If so, how?

The Department considers Xcel's error, which overstated the Company's revenue requirement deficiency for the 2021 test year and the proposed 2021 interims rates by $43.2 million, to be material in amount. Xcel initially filed its 2021 Rate Case with a $405.8 million deficiency which was overstated by $43.2 million, resulting in a corrected revenue requirement deficiency of $362.6 million. As a result, the Department concludes that Xcel's $43.2 million error resulted in a 10.6%[3] overstatement of Xcel's revenue requirement deficiency, which the Department considers to be a material amount.

The Department asked Xcel to provide the impacts of the sales true-ups compared to the 2021 Rate Case with corrected numbers for Residential, Commercial and Lighting Classes.[4] As shown in Department Table 1 below, Residential and Lighting Classes are clearly better off under the 2021 sales true-up and Commercial slightly better off under the 2021 sales true-up compared to the 2021 interim rates, but slightly worse off under the 2021 sales true-up compared to 2021 final rates. The Department concludes that the impact of Xcel's $43.2 million error in the 2021 rate case for Residential, Commercial and Lighting Classes is not significant, and as a result the focus of our comments is on the Demand Class.

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[3] $405.8 million divided by $43.2 million.

[4] This information was provided in Xcel's corrected response to Department Information Request No. 4 in Attachment A, tab called "RevResponse".

Department Table 1:
Impacts of Sales True-Up Compared to 2021 Rate Case for
Residential, Commercial, and Light Classes

Residential	Avg Monthly Impact	Avg Monthly Bill	Percentage Of Increase
2020 Sales True-Up	($3.02)	$86.25	-3.50%
2021 Sales True-Up	($0.62)	$83.07	-0.75%
2021 Rate Case Final Rates - 100%	$11.39	$86.22	13.21%
2021 Rate Case Final Rates - 52%	$5.92	$86.22	6.87%
2021 Rate Case Interim Rates	$8.09	$86.22	9.38%

Commercial	Avg Monthly Impact	Avg Monthly Bill	Percentage Of Increase
2020 Sales True-Up	$6.68	$96.87	6.90%
2021 Sales True-Up	$8.09	$96.43	8.38%
2021 Rate Case Final Rates - 100%	$5.23	$99.68	5.25%
2021 Rate Case Final Rates - 52%	$2.72	$99.68	2.73%
2021 Rate Case Interim Rates	$9.15	$99.68	9.18%

Metered Lighting	Avg Monthly Impact	Avg Monthly Bill	Percentage of Increase
2020 Sales True-Up	$1.38	$926.81	0.15%
2021 Sales True-Up	$1.10	$739.24	0.15%
2021 Rate Case Final Rates - 100%	$125.83	$807.05	15.59%
2021 Rate Case Final Rates - 52%	$65.43	$807.05	8.11%
2021 Rate Case Interim Rates	$90.61	$807.05	11.23%

The Department asked Xcel in Department Information Request No. 4[5] to update the Department's Table 2 (Demand Class Rate Impact) on page 8 of the Department's October 16, 2020 Comments in Docket Nos. E002/M-20-743 & E,G002/M-20-716, by correcting for Xcel's $43.2 million error. The Department also asked the Company to explain and include all supporting calculations. The Department includes its Original Table 2 and Corrected Table 2 below for comparison purposes.

[5] The Department included Department Information Request Nos. 4 and 5 and Xcel's corrected responses to these information requests in Attachment 1 of these comments.

Original Department Table 2: Impacts on Demand Class Under 2021 Sales True-Up Compared to 2021 Rate Case

	Avg. Monthly Impact	Avg. Monthly Bill	Percentage of Increase
2020 Sales True-Up	$269.04	$2,782.63	9.7%
2021 Sales True-Up	**$293.54**	**$2,796.03**	**10.5%**
2021 Rate Case FinalRates – 100%	$365.34	$2,936.94	12.4%
2021 Rate Case FinalRates – 52%[6]	**$189.98**	**$2,936.94**	**6.5%**
2021 Rate Case InterimRates	$276.71	$2,936.94	9.4%

Corrected Department Table 2: Impacts on Demand Class Under 2021 Sales True-Up Compared to 2021 Rate Case

	Avg Monthly Impact	Avg Monthly Bill	Percentage Of Increase
2020 Sales True-Up	$269.04	$2,782.63	9.7%
2021 Sales True-Up	**$293.54**	**$2,796.03**	**10.5%**
2021 Rate Case Final Rates - 100%	$326.44	$2,936.94	11.1%
2021 Rate Case Final Rates - 52%	**$169.75**	**$2,936.94**	**5.8%**
2021 Rate Case Interim Rates	$237.58	$2,936.94	8.1%

Consistent with the Department's October 16, 2020 Comments, we consider the comparison between the "2021 Sales True-Up" and the "2021 Rate Case Final Rates – 52%" to be the most relevant comparison. As shown in the "Original Department Table 2" the demand class was expected to see a 10.5 percent increase from the 2021 sales true-up compared to a 6.5 percent increase from the rate case (assuming 52 percent of Xcel's revenue requirement deficiency was approved for recovery). As shown in the "Corrected Department Table 2," which reflects the correction of Xcel's $43.2 million error in the 2021 Rate Case, the demand class is expected to see a 10.5% increase from the 2021 sales

[6] The Department used the amounts approved by the Commission compared to the amounts Xcel requested in rate case Docket Nos. E002/GR-13-868 and E002/GR-15-826 to determine the 52 percent.

true-up (unchanged from the "Original Department Table 2") compared to a 5.8 percent increase from the rate case. In its original analysis, based on Xcel's erroneous 2021 Rate Case data, the Department concluded that the 2021 sales true-up would have resulted in a 4.0 percentage point larger rate increase for the demand class than the 2021 Rate Case (a 10.5 percent increase versus a 6.5 percent increase). Using Xcel's corrected 2021 Rate Case data, the relative increase is expected to be 4.7 percentage points (a 10.5 percent increase versus a 5.8 percent increase). Based on the Department's review, there is not a significant change in the numbers that the Commission considered in its decision to approve Xcel's stay out or true-up proposal. However, as discussed in the next section, the Department continues to recommend some mitigation for the demand class, which is expected to see a 10.5 percent[7] rate increase from the 2021 sales true-up, which is a significant increase outside of a rate case.

B. Should the Commission reconsider its approval of Xcel's 2021 True-up Proposal and require Xcel to instead proceed with its rate case?

As discussed above, the Department concludes that the impact of Xcel's $43.2 million error in the 2021 rate case for Residential, Commercial and Lighting Classes is not significant, and as a result the focus of our comments is on the Demand Class.

The Department continues to support approval of the 2021 True-Up or Stay Out Proposal with mitigation for the Demand Class, rather than proceeding with Xcel's rate case. Xcel's $43.2 million error does not change the Department's conclusion that all rate classes except the Demand Class are likely better off under the 2021 sales true-up.

The Department concluded the following in our October 16, 2020 comments:

> As a result, the Department recommends that, if the Commission approves a sales true-up for Xcel, the Commission should require a sharing of the Sales True-Up impact by assigning 50 percent of the Sales True-Up for the Demand Class to Xcel and 50 percent to the Demand Class. The Department does not consider it reasonable for Xcel to shift all of the risk of lower sales to its customers while still earning its current rate of return and at a time when Xcel's 2nd quarter 2020 earnings were even higher than its 2nd quarter of 2019, despite COVID-19 issues.[8]

[7] In the corrected response to Department Information Request No. 5, Xcel provided an update to its 2021 sales true-up numbers which shows a projected increase in sales for demand and residential classes. This could reduce the demand class's expected increase for the 2021 sales true-up from 10.5 percent to approximately 9.2 percent assuming Xcel's sales forecast is correct, which is questionable based on 2020 sales forecast results.

[8] https://seekingalpha.com/pr/17951644-xcel-energy-second-quarter-2020-earnings-report

The Department also offered in our December 9, 2020 comments an alternative proposal in response to the Commission's request during the December 9, 2020 Public Utilities Commission Agenda Meeting addressing Docket No. E002/M-20-743:

> The Department did reconsider our position and using information already in the record, we offer the following proposal to address the $171 million Sales True-Up for the demand class for 2021:
>
> - a 1/3 sharing between the demand class, Xcel, and all other customers by using $57 million of Non-Protected ADIT that was paid for by all customers (we noted that according to Xcel there is $102 million in excess nonprotected ADIT– so using $57 million for this Sales True-Up means there is still $45 million to use as a rate mitigation tool for Covid-19 projects once a process is established, and projects are reviewed and potentially approved in docket 20-492);
>
> - specifically, the Department recommends starting with the $171 million, then reducing this amount by $57 million of Non-Protected ADIT, and assign the balance between Xcel and demand class – approximately $57 million each based on Xcel's current sales forecast.

The Department provided the following reasons to support this alternative proposal in our December 9, 2020 comments:

> - Xcel's shareholders should be able to tolerate some risk and are not currently experiencing a downturn in earnings, as supported by the fact that Xcel's total company earnings in the 2nd and 3rd quarter of 2020 were higher than 2nd and 3rd quarter of 2019.
>
> - Additionally, Commission staff briefing papers on page 11 of for agenda item 2, shows Xcel has consistently been earning its Rate of Return and Return on Equity for the four most recent years 2016 to 2019. Xcel did even better than the staff tables suggest since Xcel authorized ROE for 2016 to 2019 is actually 9.06 percent (as calculated under the 15-826 rate case settlement) and not 9.2 percent.) This means Xcel exceeded their ROE for all four years.

In Department Information Request No. 5 (B) the Department asked Xcel, besides the use of Excess ADIT and shifting costs to other ratepayers, whether there are any other tools to mitigate the 2021 sales true-up for demand class customers.

Xcel did not provide any additional tools to mitigate the 2021 sales true-up for demand class customers. Xcel did note that mitigation was discussed at length in the Commission's review of Xcel's proposal and the Commission ultimately determined that, among the various tools the Commission has considered, an extended recovery period for any demand class surcharge was in the best interest of customers. Xcel noted the extended recovery period is reflected in Order Point 7 of the Commission's April 2, 2021 Order. Xcel also mentioned its recent update to the Company's 2021 sale forecast – which the Department discussed above in footnote number six of these comments.

The Department notes that the Commission has broad authority to make changes to rate requests to ensure rates are reasonable and encourages the Commission to modify Xcel's proposal by adopting the Department's recommendation in our alternative proposal to mitigate the impact on the Demand Class, to ensure a fair and reasonable sharing of risk associated with the proposed 2021 sales true-up.

C. Are there other issues or concerns related to this matter?

Yes. As a result of Xcel's $43.2 million error which overstated the Company's revenue requirement deficiency, Xcel offered to have an independent auditor review the Company's 2021 earnings, at the Company's expense, and provide a report for purposes of measuring the Company's earnings against the 9.06 percent return on equity cap for 2021. The Department notes that this cap for 2021, where customers would be refunded any amount above the 9.06 percent return on equity cap, was approved as part of the Xcel Stay Out or True-Up Proposal. The Department supports, and recommends the Commission approve, this offer by Xcel to have an independent auditor, at Xcel's expense, review the Company's earnings against the 9.06 percent equity cap for 2021.

Additionally, Xcel noted that the Company is reviewing its internal process for preparing rate case data to ensure similar errors do not occur in the future. Xcel also noted that the $43.2 million error merits a full reassessment of the Company's validation procedures, and the Company is committed to conducting that review and reporting to the Commission on the improvements the Company will be making. At a minimum, the Department supports Xcel reporting the improvements to the Company validation procedures, as part of its next rate case filing. Additionally, the Department recommends the Commission consider requiring Xcel to have an independent auditor, at Xcel's expense, review the Company's validation procedures and resulting revenue requirement deficiency, to ensure no future double recovery of costs.

III. CONCLUSIONS AND RECOMMENDATIONS

The Department recommends the following regarding the Commission's three topics that are open for comment:

A. *Does the information contained in Xcel's March 3, 2021 letter materially change the Commission's rationale for approving Xcel's 2021 True-up Proposal? If so, how?*

The Department concludes that Xcel's $43.2 million error resulted in a 10.6%[9] overstatement of Xcel's revenue requirement deficiency, which the Department considers to be a material amount.

Based on the Department's review, there is not a significant change in the numbers that the Commission considered in its decision to approve Xcel's stay out or true-up proposal. However, as discussed in the next section, the Department continues to recommend some mitigation for the demand class, which is expected to see a 10.5 percent[10] rate increase from the 2021 sales true-up, which is a significant increase outside of a rate case.

B. *Should the Commission reconsider its approval of Xcel's 2021 True-up Proposal and require Xcel to instead proceed with its rate case?*

The Department continues to support approval of the 2021 True-Up or Stay Out Proposal with mitigation for the Demand Class, rather than proceeding with Xcel's rate case. Xcel's $43.2 million error does not change the Department's conclusion that all rate classes except the Demand Class are likely better off under the 2021 sales true-up.

The Department notes that the Commission has broad authority to make changes to rate requests to ensure rates are reasonable and encourages the Commission to modify Xcel's proposal by adopting the Department's recommendation in our alternative proposal to mitigate the impact on the Demand Class, to ensure a fair and reasonable sharing of risk associated with the proposed 2021 sales true-up.

C. *Are there other issues or concerns related to this matter?*

Yes. The Department supports, and recommends the Commission approve, the offer by Xcel to have an independent auditor, at Xcel's expense, review the Company's earnings against the 9.06 percent equity cap for 2021.

At a minimum, the Department supports Xcel reporting the improvements to the Company validation procedures, as part of its next rate case filing. Additionally, the Department recommends the Commission consider requiring Xcel to have an independent auditor, at Xcel's expense, review the Company's validation procedures and resulting revenue requirement deficiency, to ensure no future double recovery of costs.

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[9] $405.8 million divided by $43.2 million.

[10] In the corrected response to Department Information Request No. 5, Xcel provided an update to its 2021 sales true-up numbers which shows a projected increase in sales for demand and residential classes. This could reduce the demand class's expected increase for the 2021 sales true-up from 10.5 percent to approximately 9.2 percent assuming Xcel's sales forecast is correct, which is questionable based on 2020 sales forecast results.

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-20-723 and E002/M-20-743

Dated this 22nd day of April 2021

/s/Sharon Ferguson

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