

November 14, 2024

Will Seuffert
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Reply Comments of the Minnesota Department of Commerce
Docket No. E002/M-23-524

Dear Mr. Seuffert:

Attached are the reply comments of the Minnesota Department of Commerce (Department) in the following matter:

Petition for Approval of Residential Time-of-Use Rates.

The Petition was filed by Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) on December 22, 2023.

The Department recommends **approval with modifications** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Peter Wyckoff, Ph.D.
Deputy Commissioner, Division of Energy Resources

AB/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E002/M-23-524

I. INTRODUCTION

On August 16, 2024 Xcel filed a revised time-of-use (TOU) rate design proposal. Xcel states that the proposal now includes the following elements:

- Replace current Residential TOU rates with this modified TOU design.
- Implement the rate as a voluntary option for all Residential customers.
- Upon launch, the Company will test targeted communication approaches and garner feedback. Thereafter, the Company will begin active marketing to recruit voluntary enrollments.
- The rate design features a shortened and later on-peak period of 7 p.m. to 10 p.m. for non-holiday weekdays.
- The rate design features reduced ratios between on-peak and off-peak periods and moderates the seasonal difference in rates from the design presented in the Company's original compliance proposal.
- Modifications to net-metering tariffs to align with the residential TOU rate service.
- Modifications to Space Heating Rate proposal.¹

As stated in our previous comments, the Department continues to recommend that Xcel's TOU rate be approved with an opt-out provision (rather than an opt-in provision) and with phased implementation modeled on the approach approved by the Commission in Docket No. E015/M-20-850. In addition, to protect ratepayers, the Department recommends the Commission apply the same pilot bill protections that were in the Department's recommended initial phase, with the need for subsequent bill protections evaluated afterwards. Finally, the Department recommends the Commission require Xcel to exempt medical-equipment dependent customers, consistent with Xcel's initial pilot.

¹ Xcel Energy, Supplemental Revised Proposal, August 16, 2024. (eDockets) [20248-209568-01](#), Hereinafter "Xcel Supplement"

II. PROCEDURAL BACKGROUND

December 22, 2023	Xcel files its Petition for approval of a Residential Time-of-use (TOU) Rate Design, which proposes to implement a TOU rate for all residential customers in its Minnesota service territory.
January 16, 2024	The Public Utilities Commission (Commission) posted a notice of comment period for the petition.
May 16-20, 2024	Parties and stakeholders to the docket filed initial comments. Comments were filed by Center for Energy and Environment (CEE), American Council for an Energy Efficient Economy, Uplight Inc. (Uplight), City of Minneapolis, Office of Attorney General (OAG), Citizens Utility Board of Minnesota (CUB), Fresh Energy, GridX, Inc. (GridX), All Energy Solar, and the Department.
August 8, 2024	The Commission files a Notice of Extension Variance setting the following time periods: Xcel to file supplement with a revised proposal on August 16, 2024; initial comments on Xcel's revised proposal on October 15, 2024; and reply comments on Xcel's revised proposal on November 14, 2024.
August 16, 2024	Xcel Supplement.
October 15 2024	Parties and stakeholders to the docket filed comments. Comments were filed by CEE, Uplight, CUB, OAG, GridX, Fresh Energy, Minnesota Solar Energy Industry Association (MnSEIA) and the Department.

III. DEPARTMENT ANALYSIS

A. SUMMARY OF KEY DOCUMENTS

This section will summarize Xcel's Supplement and the Department's Comments to establish a framework for the reply comments.

A.1. Summary of Xcel Supplement

As noted in the Department's October 15, 2024 Comments, the Xcel Supplement differs significantly from its initial proposal. The Xcel Supplement proposes an opt-in offering (instead of opt-out) with a later and shorter peak period of 7-10 p.m. (instead of Xcel's originally proposed 3-8 p.m.). Xcel also proposes to cut the peak-period price ratios by roughly half across-the-board by—for example,

changing the summer on-peak/off-peak ratio from 7.3 to 2.7. In addition, Xcel proposes revised electric space heating rates and changes to its net metering tariffs.

A.2. Summary of October 15 Department Comment

The Department reviewed the comments from other parties and notes there appears to be more areas of agreement than disagreement among parties. Apart from MnSEIA, all parties recommended the Commission approve with modifications Xcel's proposed revised TOU rate design as presented in the Xcel Supplement. Parties appear to support many of Xcel's proposals in its supplement with similar proposed modifications as recommended by the Department. There were a few areas of disagreement, which the Department will address below.

In our October 15 Comments, the Department made the following recommendations:

- Opt-out with phased implementation modeled on Minnesota Power's (MP) approach as approved by the Commission in Docket No. E015/M-20-850.
- Apply the same pilot bill protections applied to the Department's recommended initial "pilot of a default" phase, with the need for subsequent bill protections evaluated afterwards.
- If an opt-out rate is approved, require Xcel to exempt medical equipment dependent customers, consistent with Xcel's initial pilot.
- Seasonal periods:
 - June to September and October to May.
 - Seasonal price premium (June to September relative to October to May) as designed in Xcel's supplemental filing.
- On-peak, off-peak and base time periods:
 - On-peak period of 4 p.m.-7 p.m. non-holiday weekdays.
 - Off-peak period of 11 p.m.-6 a.m. all days.
 - Base period of all other hours.
 - Peak period price ratios as designed in Xcel's supplemental filing.
- Approve Xcel's space heating rates.
- Require Xcel to change the rates and peak periods in the Residential EV Accelerate At Home Pay As You Go Service, Residential Electric Vehicle Subscription Pilot Service, and Multi-Dwelling Unit Electric Vehicle Service Pilot tariffs to reflect the approved residential TOU rates and peak periods.
- Approve Xcel's proposed changes to its net-metering tariffs.
- Time of day fuel clause adjustment (TOD FCA) rates for TOU residential customers using Xcel's proposed methodology.
- Require Xcel to file annual progress reports including, at a minimum, the information proposed in Xcel's supplemental filing, If not duplicative with other filing requirements.

The Department also recommended the Commission require Xcel to submit a compliance filing with an implementation plan and proposed tariff changes reflecting these parameters within 90 days of the Commission's Order in this docket. The Department recommended the Commission then open a 30-day comment period regarding Xcel's compliance filing to ensure it appropriately reflects the parameters approved. The Commission would then issue a subsequent Order approving the compliance filing with any modifications needed and Xcel would proceed with implementation of TOU rates.

B. CONTESTED ISSUES

This section will address issues where parties either expressed disagreement in their comments with one of the Department's recommendations or proposed an alternative modification to what the Department recommended.

B.1 Opt-in vs. Opt-out

The OAG-RUD expressed agreement with Xcel's revised proposal in the Supplement for an opt-in offering, instead of the opt-out that was part of Xcel's original proposal.² Like the Department, Fresh Energy and CUB both recommended the Commission *not* approve opt-in TOU rates. CUB expressed support for a default rate over an opt-in rate³ and Fresh Energy also favors an opt-out rather than an opt-in offering.⁴ MnSEIA recommended the Commission deny Xcel's revised proposal and "instruct the utility to conduct a second pilot program."⁵ MnSEIA did not state whether the second pilot should be an opt-in or opt-out pilot.

As noted in our October 15 Comments, the Department is concerned with the inherent problems of adopting an opt-in TOU rate because of "structural winners" and the likely low participation rate of opt-in customers. Based on these concerns, the Department concludes that adopting Xcel's revised proposal for an opt-in rate likely would achieve no meaningful impacts or learnings.⁶

For these reasons, the Department recommends an opt-out with phased implementation modeled on MP's approach as approved by the Commission in Docket No. E015/M-20-850. Under the MP implementation plan MP's customers are transitioning from flat rates to default, opt-out TOU rates in four phases. MP customers retain the ability to opt out of the TOU rate and return to flat rates at any time and during any phase. This approach allows Commission to monitor MP's progress and require MP to adjust as warranted.⁷

² OAG Comments, October 15, 2024, (eDockets) [202410-211017-02](#) at 6. Hereinafter "OAG Comments."

³ CUB Comments, October 15, 2024, (eDockets) [202410-210993-02](#) at 5. "For these reasons, we believe a default TOU rate should remain Xcel's—and the Commission's—end goal." Hereinafter "CUB Comments."

⁴ Fresh Energy Comments, October 15, 2024, (eDockets) [202410-211018-01](#) at 3. Hereinafter "Fresh Energy Comments."

⁵ MNSEIA Comments, October 15, 2024, (eDockets) [202410-211022-01](#) at 9. Hereinafter "MNSEIA Comments."

⁶ Department Comments, October 15, 2024 (eDockets) [202410-210987-01](#) at 6-7. Hereinafter "Department Comments."

⁷ *Id.*

Applying the MP's phased approach to Xcel's transition to opt-out default TOU rates would begin with phase two, since Xcel has already resolved any required TOU billing complications by conducting the TOU pilot. For this next phase, Xcel would conduct a second pilot using the new, potential default rate approved by the Commission and expanding the pilot to a larger treatment group, such as 20,000 customers. The goal of this phase would be to evaluate the new rate design based on customer response, bill impacts, and feedback. Consistent with MP's approach, this "pilot of the default rate" phase would last 12 months.

The following phase of Xcel's implementation plan would evaluate the results of the second pilot. The goal of this phase will be to incorporate lessons from the second pilot on bill impacts and customer responses to use for expanding the pilot to an even larger treatment group by defaulting additional customers to TOU rates. The evaluation of this phase would include a more expansive, formal analysis of bill impacts and customer response, with the goal to gather enough information so that future rates could be designed with specific, measurable objectives in mind such as reducing peak loads by a specific MW amount. Xcel would determine whether the existing rate structure and time periods need to be updated for optimal alignment and benefit before moving forward with final phase of transitioning all residential customers to the default opt-out TOU rate.

B.2 Peak Time and Days

Xcel originally proposed a peak period time from 3 p.m.-8 p.m. and proposed a shorter and later peak period to be from 7 p.m.-10 p.m. in its supplement. All parties agreed with Xcel's decision to shorten the peak period time to three hours, and most were supportive of Xcel's proposed three-hour peak period from 7 p.m.-10 p.m. Both CUB and the OAG were supportive of moving the on-peak window later in the evening.⁸ MnSEIA also appeared to agree with moving the on-peak window to a later window, by stating it recommends the Commission "[...] instruct the utility to conduct a second pilot program, *utilizing the updated time frames included in its second proposal* [...]."⁹

Fresh Energy disagreed with Xcel's proposed three-hour peak period from 7 p.m.-10 p.m. Fresh Energy recommends the Commission direct Xcel to revise the on-peak period to be from 6 p.m.-9 p.m., to "better reflect underlying system challenges and costs throughout the year."¹⁰ The Department recommended the Commission direct the on-peak period to be a three-hour period from 4 p.m.-7 p.m. The Department's recommended TOU time periods were based on analysis of hourly Midcontinent Independent System Operator (MISO) energy costs for Xcel's system, peak periods used elsewhere, and estimates of how residential customers might be able to respond. The Department concluded a 4 p.m.-7 p.m. design is aligned with locational marginal prices (LMPs) and also aligned with peak periods successfully used elsewhere in the United States. (The Department also considered 5 p.m.-8 p.m. as an

⁸ CUB Comments at 2-3; OAG Comments at 6-7.

⁹ MNSEIA Comments at 9 (emphasis added)

¹⁰ Fresh Energy Comments at 2.

alternative but concluded 4 p.m.-7 p.m. was preferable because it is more aligned with hourly energy costs and gives residential customers more of an opportunity to shift load to the later evening hours.)¹¹

In its October 15 Comments the Department noted that Xcel's proposed 7 p.m.-10 p.m. peak period appears to be a significant outlier when compared to other TOU rates. After a review of several utilities' residential TOU rates, the Department noted 3 p.m.-7 p.m. is the most common on-peak period, with no periods going past 9 p.m. The Department is concerned that Xcel's proposal would encourage customers to shift load to higher cost periods, resulting in a higher cost system. The Department is also concerned that Xcel's proposal is out of step with rate periods successfully adopted elsewhere.

The Department continues to recommend on-peak, off-peak and base time periods for Xcel residential TOU rates as follows:

- On-peak period of 4 p.m.-7 p.m. non-holiday weekdays.
- Off-peak period of 11 p.m.-6 a.m. all days.
- Base period of all other hours.

B.3 Net Metering Customers

Xcel's supplemental filing provided net metering tariff changes. As explained by Xcel, the Company will file specific rates for these tariffs in on January 2, 2025, its next Cogeneration and Small Power Production annual filing. The relevant tariff language describing payment for excess generation in Xcel's Supplement states the following:

6. For customers on 3-period time of use retail electric service, payment for energy delivered to Company in excess of energy used during the monthly billing period will be calculated as follows:
 - a. All QF generation and customer usage will be netted in like time of use periods as follows:
 - i. Any mid-peak QF production will be netted against mid-peak usage.
 - ii. Any off-peak QF production will be netted against off-peak usage.
 - iii. Any on-peak QF production will be netted against on-peak usage.
 - b. After QF generation and customer usage are netted in like time of use periods, further netting will be applied in the following order:
 - i. Any remaining mid-peak QF generation will be netted against off-peak usage not already offset.
 - ii. Any remaining on-peak QF generation will be netted against mid-peak usage not already offset.

¹¹ Department Comments at 3-5.

- iii. Any remaining on-peak QF generation will be netted against off-peak usage not already offset.
- c. After all netting has occurred as described above, the remaining excess QF generation during the monthly billing period will be credited at the above rate for payment per kWh for Energy Delivered to Company in Excess of Energy Used.¹²

6(a-b) describe how net metered customers generation is netted against customer energy usage for each TOU time period. 6(c) describes how the remaining excess generation during the monthly billing period is credited using the average retail utility energy rate or the A50 rate.

MnSEIA recommends the Commission not approve this language. MNSEIA disagrees with Xcel's proposal under 6(c) to compensate TOU customers for excess generation at the A50 rate. MnSEIA appears to argue that TOU customers should either be compensated at an alternative rate or that the A50 rate should be calculated differently for net metered TOU customers. According to MnSEIA, If Xcel shifts residential rate customers to a TOU rate with three separate rate periods, then the average retail utility energy rate should be a three-period rate as well.¹³

The Department disagrees with MnSEIA's argument for two reasons. First, Xcel does not appear to have another rate alternative to offer residential customers for excess generation other than the A50 rate. Together Minn. Rule. 7835.4012 and 7835.4013 can be read to require utilities to compensate net-metered customers "at the average retail utility energy rate" or A50 rate.¹⁴

Second, MnSEIA's argument that the average retail rate should be a three-period rate is misplaced and unreasonable. Under Xcel's proposed language, net-metered customers will already have their energy production netted against their energy production that occurs during the same time period according to the terms in 6(a) above and any remaining production in any time period will be netted against usage not already offset in another time period according to terms of 6(b).

Under MnSEIA's proposal net metered customers would be compensated approximately \$0.046/kWh higher for any excess generation produced during the summer on-peak time period and only \$0.026/kWh lower for any excess generation produced during the summer mid-peak or base time period.¹⁵ Accordingly, MnSEIA's proposal would have negative rate impacts on residential customers that are not net-metered customers. MnSEIA's proposal for compensating net-metered customers at

¹² Xcel Supplement, August 16, 2024. (eDockets) [20248-209568-01](#), Attachment C, MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2, Revised Sheet No. 2, 2.1..

¹³ MNSEIA Comments at 10-11.

¹⁴ Minn. Rule 7835.4012, Subpart 1. **Facilities with less than 40 kilowatt capacity.** *A qualifying facility with less than 40 kilowatt capacity has the option to be compensated at the average retail utility energy rate, the simultaneous purchase and sale billing rate, or the time-of-day billing rate.* Minn. Rule 7835.4013, Subp. 2. **Additional calculations for billing.** *When the energy generated by the qualifying facility exceeds that supplied by the utility during a billing period, the utility must compensate the qualifying facility for the excess energy at the average retail utility energy rate.*

¹⁵ Xcel Supplement at Attachment C, MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2, Revised Sheet No. 2 and Table 2 at 7.

the proposed residential TOU rates would be unnecessarily complicated and potentially unreasonable with negative rate impacts on residential customer that are not net-metered customers.

The Department reviewed Xcel's proposed tariff changes and concludes they reasonably reflect the implementation of a new three-part residential time-of-use rate, while being consistent with the existing net metering parameters as set forth in the corresponding tariffs. The Department recommends approval of Xcel's proposed changes to its net metering tariff.

C. ISSUES WITH AGREEMENT BETWEEN PARTIES

Parties agree with several of Xcel's proposals in the revised proposal in its supplement. Most parties agree with Xcel's updated space heating rates. CEE performed a detailed analysis of Xcel's updated space heating rates and was an enthusiastic supporter of Xcel's updated proposed residential electric space heating rates.¹⁶ The Department is also supportive of Xcel's updated space heating rates and recommends they be approved by the Commission.

Most parties also agreed with Xcel's proposal for customer education and engagement. Both CUB and Fresh Energy recommend Xcel include "shadow billing" in its customer education and engagement plan. As explained by CUB:

Shadow billing uses actual household consumption data to create a personalized comparison of customer costs under different rate options. This comparison appears on customers' monthly bills and allows them to easily consider the cost impacts of enrolling in TOU rates. Some utilities have implemented more robust forms of shadow billing that provide "what if" scenarios showing multiple versions of a customer's bill under a TOU rate, plus a hypothetical bill reflecting if peak load had been shifted.¹⁷

CUB recommends the Commission require Xcel to solicit bids and evaluate the cost of implementing shadow billing for its TOU rate.¹⁸ Fresh Energy agrees with CUB's recommendation that the Commission require Xcel to explore the feasibility of developing and implementing a shadow billing program.¹⁹ The Department agrees with CUB and Fresh Energy and recommends the Commission require Xcel to explore the feasibility and evaluate the costs of implementing a shadow billing program. The Department concludes that shadow billing could be especially useful for an opt-out TOU program.

¹⁶ CEE Comments, October 15, 2024, (eDockets) [202410-210974-01](#).

¹⁷ CUB Comments at 6.

¹⁸ *Id.*, at 8.

¹⁹ Fresh Energy Comments at 6.

Parties also appear to agree that the Commission should require Xcel to include the same bill protections it used in its pilot residential TOU plan. Specifically, the Department recommends the Commission require Xcel to apply the same residential pilot bill protections to the Department's recommended initial "pilot of a default" phase, with the need for subsequent bill protections evaluated afterwards.

Finally, parties appear to agree on the importance of data collecting for the TOU rates and the need for annual reporting on the progress of the residential TOU rates. The Department recommends the Commission require Xcel to file annual progress reports including, at a minimum, the information proposed in Xcel's Supplement, if not duplicative of other filing requirements.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of parties' October 15 Comments and the information in the record, the Department offers the following recommendations for the Commission.

- A. Require Xcel to use an opt-out approach with phased implementation modeled on Minnesota Power's (MP) approach approved by the Commission in Docket No. E015/M-20-850.*
- B. If an opt-out rate is approved, require Xcel to exempt medical equipment dependent customers, consistent with Xcel's initial pilot.*
- C. Require Xcel to apply the same residential TOU pilot bill protections to the Department's recommended initial "pilot of a default" phase, with the need for subsequent bill protections evaluated afterwards.*
- D. Approve Seasonal periods: June to September and October to May.*
- E. Approve Seasonal price premium (June to September relative to October to May) as designed in Xcel's supplemental filing.*
- F. On-peak period of 4 p.m.-7 p.m. non-holiday weekdays. Off-peak period of 11 p.m.-6 a.m. all days. Base period of all other hours.*
- G. Peak period price ratios as designed in Xcel's supplemental filing.*
- H. Approve Xcel's space heating rates.*
- I. Require Xcel to explore the feasibility and evaluate the costs of implementing a shadow billing program.*
- J. Require Xcel to change the rates and peak periods in the Residential EV Accelerate At Home Pay As You Go Service, Residential Electric Vehicle*

Subscription Pilot Service, and Multi-Dwelling Unit Electric Vehicle Service Pilot tariffs to reflect the approved residential TOU rates and peak periods.

- K. Approve Xcel's proposed changes to its net-metering tariffs.*
- L. Approve TOD FCA rates for TOU residential customers using Xcel's proposed methodology.*
- M. Require Xcel to file annual progress reports including, at a minimum, the information proposed in Xcel's supplemental filing, If not duplicative of other filing requirements.*

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
Reply Comments

Docket No. E002/M-23-524

Dated this **14th** day of **November 2024**

/s/Sharon Ferguson

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