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August 17, 2015

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

—Via Electronic Filing—

RE: REPLY COMMENTS  
SERVICE AGREEMENT MODIFICATIONS – ANNUAL  
DOCKET NO. E,G002/AI-15-536

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to the August 7, 2015 Comments of the Minnesota Department of Commerce in the above-referenced docket.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list.

Please contact Jody Londo at (612) 330-5601 or [jody.l.londo@xcelenergy.com](mailto:jody.l.londo@xcelenergy.com) or me at (612) 330-6064 or [bria.e.shea@xcelenergy.com](mailto:bria.e.shea@xcelenergy.com) if you have any questions regarding this filing.

SINCERELY,

/s/

BRIA E. SHEA  
MANAGER, REGULATORY DOCUMENT CONTENT  
RATES AND REGULATORY AFFAIRS

Enclosures  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

|                         |              |
|-------------------------|--------------|
| Beverly Jones Heydinger | Chair        |
| Nancy Lange             | Commissioner |
| Dan Lipschultz          | Commissioner |
| John Tuma               | Commissioner |
| Betsy Wergin            | Commissioner |

IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY  
FOR APPROVAL OF ITS 2016 ANNUAL  
COST ALLOCATION MODIFICATIONS TO  
ITS SERVICE AGREEMENT WITH XCEL  
ENERGY SERVICES INC.

DOCKET NO. E,G002/AI-15-536

**REPLY COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to the August 7, 2015 Comments of the Minnesota Department of Commerce in the above-referenced docket.

We appreciate the Department's thorough review of our Service Company cost allocations modification filing and recommendation that the Commission approve the Claim Services and Personal Accounts Representative Team allocation changes. In this Reply, we respond to the Department's Comments regarding our other proposed changes to the Supply Chain and Rates and Regulatory Service Functions.

We respectfully request that the Commission approve the Third Amendment to the Service Agreement, as supplemented by this Reply, to affect regulatory approval of these changes. The changes are in the public interest, because they serve to allocate Service Company costs in the most cost-causative manner, which is consistent with the Commission's guidance and our cost allocation principles.

## REPLY

### A. Supply Chain Service Function

In Comments, the Department opposed our proposed allocation change for the Supply Chain Service Function, saying we had not met our burden of proof that the Invoice Transaction Ratio is the most-causative Allocation Method. In this section, we supplement the information we previously provided, and offer a modification to Appendix A to the Service Agreement that clarifies the activities to which the Invoice Transaction Ratio will be applied.

Since discontinuing use of the Labor Dollars Allocation Method in 2008, the Supply Chain Service Function has largely direct-charged their costs to the Operating Companies or through the purchase and warehouse clearing processes based on the specific work activities performed. This includes the work of negotiating agreements and contracts; we agree with the Department that this work is labor intensive, and that the Invoice Transaction Ratio would not be a cost-causative allocation method for this type of work.

However, our proposal to use the Invoice Transaction Ratio for this Service Function is to allocate only one specific activity of their work – *management and oversight of the payment and reporting services*. This is because, as discussed above, the costs for all other activities are otherwise assigned on a cost-causative basis. The specific work involved in payment and reporting services consists of processing payments to vendors, providing audit research and reconciliation support for Accounts Payable transactions, preparing statistical and 1099 reporting, and administering the purchase card programs – all of which are directly related to volumes of invoices. Therefore, the Invoice Transaction Ratio is the most cost-causative Allocation Method for this specific subset of work, and our proposed change is in the public interest and should be approved.

We understand the Department is uneasy with “optionality” in the Service Agreement. In our most recent Service Company allocations proceeding (Docket No. E,G002/AI-14-234), we resolved this concern by specifying the activities that generally fall within each Allocation Method, if more than one was specified. While we are proposing only one Allocation Method for Supply Chain, we propose to clarify in Appendix A to the Service Agreement that the only costs that would be allocated using the Invoice Transaction Ratio are associated with management and oversight of the payment and reporting services activities, as follows:

## l) Supply Chain\*

Description - Includes contract negotiations, development and management of supplier relationships and acquisition of goods and services. Also includes inventory planning and forecasting, ordering, accounting and database management. Warehousing services includes receiving, storing, issuing, shipping, returns, and distribution of material and parts.

Method of Allocation - Supply Chain will be direct charged, ~~and~~ Any management and oversight of the payment and reporting services activities administrative support functions that cannot be direct charged will be allocated using the Invoice Transaction ~~Labor Dollars~~ Ratio.

We note that the original changes we proposed in our Petition for this Service Function are indicated in red. The clarifying changes we propose with our Reply are indicated in blue.

## B. Rates and Regulation

The currently-approved Service Agreement has two Allocation Methods for the Rates and Regulation Service Function – the Labor Dollars Ratio and the Revenue Ratio. In our Petition, we explained that we were completing our elimination of the Labor Dollars Ratio, as it is no longer in use – something we started to do in our most recent Service Company Agreement filing in Docket 14-234. Further, in practice, the majority of the Rates and Regulation services are driven by and directly-charged to Operating Companies, with any remaining costs properly allocated using the Revenue Ratio.

However, the Department raised a concern as to whether the Revenue Ratio is the most cost-causative method of allocation, given the labor-intensiveness of the Rates and Regulation Service Function – and whether its use would properly allocate costs to regulated and non-regulated entities. We address both of these concerns below.

### 1. *The Revenue Ratio Is the Most Cost-Causative Allocation Method*

Despite its name, the Labor Dollars Ratio was never used to allocate labor. It was created and used to allocate non-labor support costs including office supplies purchases, training, and computer and copier hardware expenses. The Labor Dollars Ratio was calculated in the accounting system based on each Service Function's labor charges for the month – taking a monthly snapshot of the labor (both allocated and non-allocated labor) on a date near the end of the month.

It would then create percentages based on the accounting subledger to which the labor had been charged. These percentages were applied to the non-labor support costs, so those costs followed the labor charges – and were assigned in the same manner. Because the key statistical component of the Labor Dollars Ratio was the amounts of direct-assigned and allocated labor costs, use of the Labor Dollars Ratio to allocate labor costs would be circular and would lack cost causality.

The Revenue Ratio has been historically used to allocate general labor costs, as its calculation facilitates the allocation of non-direct-charged costs benefiting all operating and affiliate entities based on their percentage of overall revenue.<sup>1</sup> In the case of the Rates and Regulation Service Function, this Allocation Method has been used since prior to 2008 to allocate all non-direct-charged labor. Since 2008, when the Labor Dollars Ratio was eliminated, the Revenue Ratio has also been used to allocate non-labor costs that cannot be direct-charged.

The activities involved in the Rates and Regulation Service Function are: (1) determination of the regulated utilities' revenue requirements and rates for electric and gas customers; (2) preparation of the rate case filings; (3) coordination of the regulatory compliance requirements; (4) relationships building with regulatory bodies; and (5) policy development of regulatory and legislative strategy. As noted previously, the majority of Rates and Regulation costs are direct-charged, as they directly correlate with rate case and other specific regulatory proceedings. We believe this is appropriate, considering the heavy focus of the above-mentioned activities on the revenue management and earnings stability of the organization.

However, to the extent the Department believes an allocation method based on the labor distribution of the Rates and Regulation Service Function would be more appropriate for non-direct-charged costs going forward, we offer to conduct an analysis comparing a labor-based allocation method to the Revenue Ratio and present our findings in our next annual filing.

The Department requested that we provide an estimated allocation of Rates and Regulation costs to the Minnesota jurisdiction for 2014 and 2015 under the Labor Dollar Ratio and Revenue Ratio. As we have stated previously, the Labor Dollars Ratio is no longer in use – so any estimate would be an approximation using statistics from 2009. Further, as we have explained, use of the Labor Dollars Ratio to allocate labor costs – as it is currently defined – would not be appropriate.

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<sup>1</sup> The Revenue Ratio is based on the sum of the monthly revenue amounts for the prior year ending December 31 – the numerator of which is for an applicable Operating Company or affiliate company, and the denominator of which is for all applicable Operating Companies and affiliate companies.

With this Reply, we believe we have provided the additional information needed for the Department to more fully assess our proposal to allocate all non-direct-charged costs for this Service Function using the approved Revenue Ratio.

## 2. *Affiliate Costs are Direct-Charged*

Using the Company's recently-proposed Transco affiliate as an example, the Department stated that the Labor Dollars Ratio is needed to properly allocate Rates and Regulatory costs associated with its work to support affiliates. While we appreciate and share the Department's concern about proper allocation of costs between regulated and non-regulated entities, we respectfully disagree that the Labor Dollars Ratio is needed to properly assign Service Company costs.

Also using the establishment of the Transco as an example, Xcel Energy Services, Inc. created a work order system for the Service Company to segregate and track costs by Transco legal entity and project, as it would for any new affiliate. The unique work orders that have been established facilitate billing between the Service Company and the relevant Transco entity.<sup>2</sup> Therefore, costs incurred are directly-charged, so no Allocation Method is needed to ensure costs are properly assigned to the regulated and non-regulated entities.

We continue to believe the changes we have proposed in this filing facilitate cost-causative relationships consistent with the Commission's established criteria and guiding principles, which we continue to employ today.<sup>3</sup> These changes are in the public interest because they allocate Service Company costs in the most cost-causative manner.

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<sup>2</sup> See IN THE MATTER OF THE REQUEST FOR APPROVAL OF NEW ADMINISTRATIVE SERVICE AGREEMENTS BETWEEN NORTHERN STATES POWER COMPANY AND XCEL ENERGY TRANSMISSION DEVELOPMENT COMPANY, LLC AND XCEL ENERGY SOUTHWEST TRANSMISSION COMPANY, LLC., Docket No. E-002/AI-14-759, Petition at 12 (Sept 3, 2014). Please note that the Commission's August 3, 2015 Order approving the Agreements, the Commission required compliance filings containing information about the allocation of Transco costs as follows: ". . . (a) thirty (30) days after the Commission issues an order in this Docket for the 2014 data, and (b) by May 31, 2016 for the 2015 data, that will identify the amount of fully allocated costs incurred by Transco's from Northern States Power – Minnesota (NSP-M) and for purposes of examining allocations to NSP-M, the fully allocated costs by Transcos from Xcel Energy Services Inc."

<sup>3</sup> See the Commission's September 28, 1994 Order in Docket No. E,G999/CI-90-1008.

## CONCLUSION

Xcel Energy respectfully requests that the Commission approve our proposed changes to the Service Agreement, as supplemented by this Reply, that memorialize the cost-causative modifications we have made to our actual cost allocation methods.

Dated: August 17, 2015

Northern States Power Company

**CERTIFICATE OF SERVICE**

I, Jim Erickson, hereby certify that I have this day served copies or summaries of the foregoing document on the attached list(s) of persons.

xx by depositing a true and correct copy thereof, properly enveloped  
with postage paid in the United States Mail at Minneapolis, Minnesota

xx electronic filing

**DOCKET No. E,G002/AI-15-536**

Dated this 17th day of August 2015

/s/

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Jim Erickson



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