

November 22, 2017

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-17-712

Dear Mr. Wolf:

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

Petition for Approval of the Renewable Development Fund Annual Report, Tracker Account True-up, and Request for New 2018 Rate Rider Factor.

The petitioner is:

Bria E. Shea
Director, Regulatory & Strategic Analysis
Northern States Power Company d/b/a Xcel Energy
414 Nicollet Mall
Minneapolis, Minnesota 55401-1993

The Department recommends that **Xcel Energy provide additional information in its reply comments** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ SAMIR OUANES
Rates Analyst

SO/lt
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-17-712

I. SUMMARY

On September 29, 2017, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed a petition (Petition) requesting that the Minnesota Public Utilities Commission (Commission) approve the 2018 Renewable Development Fund (RDF) rate rider factor beginning January 1, 2018. The Company also requested that the Commission accept the RDF Annual Report and Tracker Account True-Up.

On October 30, 2017, the Commission issued a *Notice of Comment Period* requesting initial comments by November 22, 2017 on the following topics:

- Is the 2018 RDF rate rider factor proposed by Xcel reasonable, and based on appropriate assumptions, information, and supporting calculations?
- Has Xcel complied with Minnesota Laws 2017, Chapter 94, Article 10, Section 3 (116C.779), Subdivision 1 (b) with respect to the transfer of funds to the Renewable Development Account (RDA) on July 1, 2017? Is there any action the Commission should take?
- Should the Commission take any action on the Crown Hydro RDF grant contract (AH-01) under Minnesota Laws 2017, Chapter 94, Article 10, Section 29, or other authority?
- Are there other issues or concerns related to this matter?

II. BACKGROUND

Under Minnesota Statute Section 216B.1645, subdivision 2, Xcel is allowed automatic recovery of expenditures related to the Company's RDF, once those expenditures have been approved by the Commission.

On June 11, 2004, the Commission issued an Order (2004 Order) changing how Xcel recovers its RDF costs.¹ The 2004 Order established an annual RDF tracker report with a filing date of

¹ *Order Changing Inter-Jurisdictional Cost Allocations, Establishing Rate Rider, and Removing Renewable Development Fund Expenses from the Fuel Clause*, Docket No. E002/M-03-2018.

October 1. It specified that the current RDF rate adjustment would remain in effect until the Commission establishes a new rate, with any resulting over- or under-recoveries being rolled into the rate determination for the following period.

On June 28, 2005, the Commission issued its *Order Setting Rider, Approving Contract Amendments and Process for Future Amendments, and Requiring Continued Reporting*, in Docket No. E002/M-05-109. In this Order, the Commission approved a new level for the RDF rate adjustment rider. The Commission concluded that Xcel's late payments on five RDF contracts did not jeopardize ratepayers' interests or constitute harm. With regard to the AnAerobics' project (Bid No. AB07, Cycle 1), the Commission indicated that, in an earlier decision, it had deferred a decision on the recovery of costs associated with this project to a later date.² The Commission concluded that whatever further action was warranted pertaining to AnAerobics could be better addressed in the context of Docket No. E002/M-00-1583.

On January 27, 2006, the Commission issued its *Order Approving RDF Rate Rider Factor, Accepting Compliance Filing, and Requiring Filings*.³ In this Order, the Commission adopted the Department's recommendation to remove the 2006 projected payments to Crown Hydro from the calculation of the rate rider, and approved the corresponding new level for the RDF rate adjustment rider. The Commission clarified that it understood Xcel's assurance to be that the remaining payment milestones under the Crown Hydro grant contract were all construction related and could not proceed without site control and before all needed permits are approved.

On December 15, 2006, the Commission issued an Order approving the 2007 RDF rate rider factor in Docket No. E002/M-06-1388. In this Order, the Commission adopted the Department's recommendation to remove any payment to Hilltop Power from the calculation of the 2007 RDF rate rider factor.

On December 7, 2007, the Commission issued an Order approving the 2008 RDF rate rider factor in Docket No. E002/M-07-1274.

On December 23, 2008, the Commission issued an Order approving the 2009 RDF rate rider factor in Docket No. E002/M-08-1167.

On June 2, 2010, the Commission issued its *Order Approving 2010 Renewable Development Fund Rider Factor, Requiring Compliance Filing, and Revising Calculation of Future Rider Adjustments* in Docket No. E002/M-09-1145. In this Order, the Commission adopted the Department's recommendation that the Company calculate its future RDF rate rider factors

² Commission's August 17, 2004 Order in Docket No. E002/M-00-1583.

³ *In the matter of Xcel's Petition for Approval of the Renewable Energy Development Fund Annual Report, Tracker Account True-Up, and New 2006 Rate Rider Factor*, Docket No. E002/M-05-1570.

based only on known and measurable RDF expenditures. The Commission recognized that, in limited circumstances, such expenditures can include certain forecasted amounts. The Commission therefore directed the parties to work to determine an appropriate standard against which to judge what expenditures, including forecasted amounts, can be included under the umbrella of known and measurable RDF expenditures.

On March 17, 2011, the Commission issued its Order *Approving 2011 Renewable Development Fund Rider* in Docket No. E002/M-10-1054. In this Order, the Commission allowed Xcel to continue to calculate its future RDF rate rider factors based on known and measurable Renewable Development Fund expenditures, which, in limited circumstances, can include forecasted amounts, using the criteria for “known and measurable” agreed to by Xcel and the Department. The Commission required Xcel to meet with the Department to clarify the definition and application of the five percent administrative cost cap. The Commission also denied Xcel’s request to reallocate to the Minnesota jurisdiction RDF program expenses currently allocated to the jurisdictions of North Dakota and South Dakota.

On June 6, 2011, the Commission issued its *Order after Reconsideration Modifying March 17, 2011 Order and Reallocating Expenses* in Docket No. E002/M-10-1054. In this Order, the Commission modified its March 17, 2011 Order to reallocate to Minnesota ratepayers the 2011 RDF energy production grant payments and associated administrative expenses previously allocated to North Dakota and South Dakota.

On February 17, 2012, the Commission issued its Order approving the 2012 RDF Rider in Docket No. E002/M-11-1007. In this Order, the Commission approved the proposal regarding the definition and application of the five percent administrative cost cap agreed to by Xcel and the Department. The Commission also required Xcel to identify at the time of its initial filing any actual numbers that have changed from a previous report, including a complete justification for the change.

On December 21, 2012, the Commission issued its Order approving the 2013 RDF Rider in Docket No. E002/M-12-1062. The Commission also required Xcel to enter any source data in its RDF tracker model only once as an input data, to alleviate the reoccurrence of discrepancies and inconsistencies identified by the Department in the RDF tracker account provided in the Company’s RDF petitions.

On August 8, 2013, Xcel filed a status update on the development of replacement projects for the equipment associated with the AnAerobics RDF project pursuant to the August 17, 2004 *Order Deferring Decision, Allowing Time to Develop Alternative Uses, and Requiring Consultation and Report* (2004 Order) in Docket E002/M-00-1583.

On October 2, 2013, the Department filed comments continuing to recommend disallowing rate recovery and refunding to ratepayers all amounts paid to AnAerobics, claiming the contract between Xcel and AnAerobics had been improperly amended and imprudently administered.

On January 23, 2014, the Commission issued its Order requiring Xcel to return to ratepayers the \$1.1 million paid to AnAerobics by crediting the RDF tracker account for this amount.

On January 28, 2014, Xcel filed the Commission-required refund compliance plan (Refund Plan). The Refund Plan identified the portion of the \$1.1 million that was paid by Xcel's Minnesota ratepayers as \$811,518. Attachment B of the Refund Plan shows that the amount of \$811,518 would be subtracted from the expenses Xcel will recover from its Minnesota ratepayers in setting the 2015 RDF rates.

On September 26, 2014, Xcel filed a petition in Docket No. E002/M-14-814 requesting that the Commission approve the 2015 RDF rate rider factor and accept the RDF Annual Report and Tracker Account True-Up.

On October 27, 2014, the Department filed comments recommending approval of a reduction in Xcel's proposed 2015 RDF rate rider factor to take into account the Commission-required refund of grant payments to AnAerobics that Xcel failed to subtract from the RDF tracker account.

On December 12, 2014, the Commission issued its Order approving the 2015 RDF rate rider factor as recalculated by the Department.

On December 11, 2015, the Commission issued its Order approving the 2016 RDF rate rider factor in Docket No. E002/M-15-730.

On December 11, 2016, the Commission issued its Order approving the 2017 RDF rate rider factor in Docket No. E002/M-16-811.

On September 29, 2017, Xcel filed its petition for approval of the 2018 RDF rate rider factor and 2017 RDF annual report.

On October 30, 2017, the Commission issued a Notice for Comments.

III. DEPARTMENT ANALYSIS

Currently, Xcel's RDF rate rider adjustment factor (RDF factor) is set at \$0.001034 per kWh, and is recovered through the Resource Adjustment charge, a line item on customers' bills. The level of the RDF factor is adjusted once a year to a level allowing recovery of both actual costs (using a true-up procedure) and forecasted RDF costs for known and measurable amounts. This recovery is limited to the payments to RDF projects and legislative mandates for actual or known and measurable amounts. Recovery does not extend to all RDF obligation amounts (\$500,000 per cask per year), let alone the amounts awarded to projects that have not met required milestones. This structure has been important both to ensure that ratepayers pay only for actual or known and measurable RDF costs and to hold Xcel and project owners financially accountable.

In the instant filing, the Company is requesting to increase the level of the RDF factor to \$0.001522 per kWh. For an average residential customer, the proposed RDF factor would result in a charge of about \$1.14 per month, an increase of about \$0.37 per month from the prior level.⁴

To facilitate the review of the Company's tracker report activity, the Department maintains a separate RDF tracker model and updates the information each year with the new input data provided by the Company in its annual RDF filings as summarized in the following attachments:

- **Attachment 1:** 2016 RDF Budget
- **Attachment 2:** 2017 RDF Budget
- **Attachment 3:** Option 1: Xcel's Proposed 2018 RDA Transfer and 2018 Rate Rider Factor Calculation
- **Attachment 4:** Compliance with the Commission's Five Percent Cap on Administrative Costs
- **Attachment 5:** RDF Unencumbered Cumulative Balance as of December 31, 2016
- **Attachment 6:** RDF Unencumbered Cumulative Balance as of December 31, 2017
- **Attachment 7:** Option 2: Calculation of the 2018 Transfer to Minnesota Management and Budget (MMB) Under Xcel's Proposal, Assuming \$31,500,000 Dry Cask Storage Obligation
- **Attachment 8:** Option 2: 2018 Rate Rider Factor Calculation, Based on the MMB Transfer Calculated in Attachment 7
- **Attachment 9:** Option 3: 2018 Rate Rider Factor Calculation Assuming Transfer of the 2017 RDF "Unencumbered Cumulative Balance" to MMB and that Xcel's 2018 MMB Transfer Reflects \$31,500,000 Dry Cask Storage Obligation

⁴ Based on an average monthly consumption of 750 kWh.

- **Attachment 10:** Option 4: Alternative to Option 3 to Assume Cancelled Crown Hydro Contract⁵

The Department's analysis below is based on a review of Xcel's tracker report activity in 2016, 2017 and 2018, the most recent information provided by the Company regarding the progress made by the Commission-approved RDF projects⁶ and the new legislative mandate that requires funds to be transferred to the Minnesota Office of Management and Budget (MMB).⁷

The updated input data supporting Xcel's calculation of its proposed RDF factor covers the period of January 2016-August 2017 (actual data) and the period of September 2017-December 2018 (forecasted data).

A. *KNOWN AND MEASURABLE CRITERIA*

In its November 5, 2009 comments, the Department raised a concern about the use of RDF project payment forecasts, instead of actual expenditures, given the level of the surplus (over-recovery) in the RDF tracker.⁸

The monthly cumulative balance of the RDF tracker has been negative (surplus) in the past, meaning that ratepayers paid more into the RDF tracker than Xcel actually spent. The actual cumulative surplus of the RDF tracker was about \$6 million in December 2006, \$3.8 million in December 2007, \$5.2 million in December 2008, \$3.1 million in December 2009, and \$2.9 million in December 2010.

To alleviate the overcharges due to the continuous monthly cumulative surplus balances in the Company's RDF tracker account, the Commission's March 17, 2011 Order in Docket No. E002/M-10-1054 included the following requirement:

Xcel may continue to calculate its future Renewable Development Fund rate rider factors based only on known and measurable RDF expenditures, which, in limited circumstances, can include forecasted amounts, using the criteria for "known and measurable" agreed to by Xcel and the OES [Department].

⁵ The Department addresses the Crown Hydro Contract in Section IV of these comments.

⁶ Xcel's October 26, 2017 Quarterly Status Report in Docket Nos. E002/M-00-1583, E002/M-03-1883, E002/M-07-675 and E002/M-12-1278.

⁷ A copy of the new legislation (codified in Minn. Stat. § 116C.779) is provided as Attachment 11 to these comments.

⁸ Docket No. E002/M-09-1145.

The application of these criteria (described below) appears to be working. Since March 2012, with the exception of February and March 2013, the RDF tracker has not experienced a cumulative balance surplus.

As discussed further in the Petition, Xcel complied with the above requirement as follows:

Legislative Mandates. The Company proposed to include the following legislative mandates as known and measurable RDF costs in 2016, 2017 and 2018:

- the Renewable Energy Production Incentive (Minn. Stat. § 216C.41), or REPI,⁹
- the Rebates for Solar Photovoltaic Modules (Minn. Stat. § 116C.7791), or Solar Rebates,¹⁰
- the Solar Energy Incentive Program (Minn. Stat. § 116C.7792), or Solar Incentive,¹¹
- the “Made in Minnesota” Solar Energy Production Incentive Account (Minn. Stat. § 216C.412), or Made in Minnesota,¹²
- the transfer payment of \$1M to the Department of Employment and Economic Development (2017 Chapter 94, Article 1, Section 2, subdivision jj), or MN 21st Century,¹³
- the grant payments to the City of Benson (Benson), subject to MN Statutes Section 216B.2424, subdivision 9,¹⁴
- the grant payments to Laurentian Energy Authority (Laurentian), subject to MN Statutes Section 216B.2424, subdivision 9,¹⁵ and
- the transfer payments to the Minnesota Office of Management and Budget (MMB).¹⁶

Given that these payments are mandated by law, the Department agrees with Xcel’s proposal to treat such payments as known and measurable for cost recovery purposes in 2016, 2017 and 2018. As noted by Xcel, if the Commission does not approve the Laurentian Power Purchase Agreement (PPA) termination or the Benson Plant PPA termination and closure, the corresponding grant payments will be included in the amounts transferred to MMB.

⁹ A copy of 216C.41 is provided as Attachment 12 to these comments.

¹⁰ A copy of 116C.7791 is provided as Attachment 13 to these comments.

¹¹ A copy of 116C.7792 is provided as Attachment 14 to these comments.

¹² A copy of 216C.412 is provided as Attachment 15 to these comments.

¹³ A copy of the new legislation is provided as Attachment 16 (page 3 of 3) to these comments.

¹⁴ A copy of the new requirement under 116C.779, subdivision 1.f is provided in Attachment 11 to these comments.

¹⁵ A copy of the new requirement under 116C.779, subdivision 1.g is provided in Attachment 11.

¹⁶ A copy of the new requirement under 116C.779, subdivision 1 is provide in Attachment 11.

Tables 1.1 and 1.2 below show the actual and forecasted RDF payments for these legislatively mandated programs.

Table 1.1

Minnesota Statutes	REPI 216C.41	Solar Rebates 116C.7791	Solar Incentive 116C.7792	Made in MN 216C.412	MN 21st Century 2017 Ch 94 Art 1
Up to 2015	\$ 87,799,236	\$ 11,946,522	\$ 122,246	\$ 24,035,966	\$ -
2016	\$ 2,831,220	\$ 3,513,790	\$ 523,430	\$ 12,073,296	\$ -
2017	\$ 1,478,643	\$ 2,229,564	\$ 638,339	\$ 11,868,026	\$ 1,000,000
2018	\$ 619,819	\$ 2,246,317	\$ 2,215,979	\$ -	\$ -
Up to 2018	\$ 92,728,918	\$ 19,936,193	\$ 3,499,994	\$ 47,977,288	\$ 1,000,000

Table 1.2

Minnesota Statutes	Benson 116C.779 (1.f)	Laurentian 116C.779 (1.g)	MMB 116C.779
Up to 2016	\$ -	\$ -	\$ -
2017	\$ -	\$ -	\$ -
2018	\$ 4,000,000	\$ 13,600,000	\$ 14,925,034
Up to 2018	\$ 4,000,000	\$ 13,600,000	\$ 14,925,034

Xcel summarized the REPI program as follows:¹⁷

Minn. Stat. §116C.779, Subd. 2. mandates that annual REPI payments up to \$10.9 million must be made available from the RDF account for qualifying projects, including up to \$9.4 million annually for electricity generated by wind energy conversion systems and up to \$1.5 million annually for on-farm biogas recovery facilities and hydroelectric facilities. The REPI program provides an incentive payment of 1.0 cents per kWh for wind projects through December 31, 2018, biogas projects through December 31, 2015, and hydro projects through December 31, 2021. For 2018 all REPI payments for wind and biogas have been completed and therefore the forecasted REPI amount relates only to hydro. Xcel Energy is in compliance with the REPI statute since the annual amounts to be included in the 2018 RDF rate rider for cost recovery are the aggregate incentive payment for qualifying hydroelectric facilities as reported or projected by the Minnesota

¹⁷ Source: Petition at page 10.

Department of Commerce, who administers this incentive program.

Xcel's summary of the Solar Rebates program is as follows:¹⁸

Minn. Stat. §116C.7791, Subd. 5. mandated solar rebates, up to \$5.00 per watt of installed capacity for systems up to 40 kW, to be available for installations that use solar modules either manufactured or assembled in Minnesota. The statute appropriated \$21 million from the RDF at the rate of \$2 million in state fiscal year 2011, \$4 million in state fiscal year 2012, and \$5 million per year in state fiscal years 2013 through 2015. The Minnesota Bonus rebates are paid to each qualifying customer in five consecutive annual installments. The final installments is estimated to be paid in 2019. The Minnesota Bonus Solar Rebate Program was offered from 2011–2014. As of March 28, 2014, this program has been fully subscribed to obligate the statutory appropriation of \$21 million. Since full subscription, no new applicants have been accepted.

Applications submitted prior to March 28, 2014, have been processed and honored; therefore, current disbursements from the RDF are made through existing contracts. Xcel Energy is in compliance with the statute since the annual amounts included in the RDF rate rider for cost recovery are the aggregate Minnesota Bonus rebates for qualifying solar facilities as reported or projected by the Company, as the administrator of this rebate program.

Xcel also provided a summary of the Solar Incentive program:¹⁹

Minnesota's Solar Energy Standards established by Minn. Stat. §116C.7792 directed the Company to establish a solar energy incentive program to be funded in full by RDF funds. The program is to provide solar energy production incentives for solar energy systems of no more than a total nameplate capacity of 20 kW direct current. The statute specifies that the program shall be operated for five consecutive calendar years commencing in 2014. For each of the five years, \$5,000,000 shall be allocated from the RDF to this

¹⁸ *Id.*

¹⁹ *Id.* at 11.

program. The production incentive is to be paid over the course of 10 years, commencing with the system operation. In 2017, the Minnesota Legislature approved a four year extension and appropriated an additional \$35,000,000 to the Solar Energy Incentive Program also known as Solar*Rewards. The terms of the program remain the same with the production incentive to be paid over the course of 10 years, commencing with the system operation.

...

Xcel Energy is in compliance with the statute since the annual amounts included in the RDF rate rider for cost recovery are the aggregate Solar*Rewards incentive payments for qualifying solar facilities as reported or projected by the Company, as the administrator of this incentive program.

Finally, Xcel's summary of the Made in Minnesota program is as follows:²⁰

In this filing, we not proposing to recover any costs for payments to Made in Minnesota Solar Energy Production Incentive Account, a program funded in part through the RDF. 2017 Legislation eliminated Minn. Stat. §216C.412, Subd. 1 which mandates the establishment of a Made in Minnesota Solar Energy Production Incentive Account.

The Department notes that Xcel made its last annual payment of \$11,868,026 under Minn. Stat. § 216C.412 in March 2017.²¹

The Department identified two issues with Xcel's compliance with the new legislation (Minn. Stat. §116C.779).

First, Minn. Stat. § 116C.779, subdivision 1.b required that, on July 1, 2017, Xcel:

...transfer all funds in the renewable development account previously established under this subdivision and managed by the public utility to the renewable development account established in paragraph (a). Funds awarded to grantees in previous grant cycles that have not yet been expended and unencumbered funds

²⁰ *Id.* at 15.

²¹ Source: Attachment 2 to these comments.

required to be paid in calendar year 2017 under paragraphs (f) [City of Benson Initiative] and (g) [Laurentian Energy Authority Initiative], and sections [116C.7792](#) [Solar Incentive] and [216C.41](#) [REPI], are not subject to transfer under this paragraph.

As shown in Table 1.2 above, no funds were transferred on July 1, 2017 to the RDA administered by MMB.

Second, there is ambiguity in the record regarding the calculation of the amount Xcel proposes to transfer to MMB on January 15, 2018. Xcel indicated that the amount is the result of subtracting its 2018 legislative mandates noted in Tables 1.1 and 1.2 above from the total annual obligation for the Prairie Island and Monticello nuclear plant dry cask storage. However, Xcel appears to report its total annual obligation for the Prairie Island and Monticello dry cask storage as \$37,607,149 in Table 1 of the Petition, and \$31,500,000 on page 13 of the Petition. Therefore, it is unclear whether the amount to be transferred would be \$8,817,885²² or \$14,925,034.²³ For consistency, the Department notes that the “correct” amount should be the amount projected at the time of the Petition, rather than the most up-to-date figure, since the annual RDF tracker filing and rider factor adjustment is typically based on a mix of projected and forecasted information. The RDF Rider serves to capture actual amounts as time passes.

Further, it is not clear whether some or all of the unencumbered cumulative RDF tracker balance as of December 31 should be included in the annual amount transferred to the RDA.

The Department further discusses each concern below.

1. July 1, 2017 Transfer

Xcel provided the following justification for not transferring any funds to the RDA on July 1, 2017:²⁴

Specifically, the Company recovers legislative mandates expected to be paid in the subsequent year, RDF grant project payments that meet certain known and measurable criteria, RDF administrative costs, and a true up of the previous years’ expenses. The remainder of obligated funds are tracked as unencumbered or deferred payments but are not yet collected from customers.

...

²² \$31,500,000 - \$619,819 - \$2,246,317 - \$2,215,979 - \$4,000,000 - \$13,600,000 = \$8,817,885

²³ \$37,607,149 - \$619,819 - \$2,246,317 - \$2,215,979 - \$4,000,000 - \$13,600,000 = \$14,925,034

²⁴ Petition, pages 6-7.

As described above, the Company only collects costs that have already been incurred or will be incurred within the recovery period. As there were no “funds in the renewable development account” that were unexpended or unencumbered, the Company did not transfer monies to the RDA on July 1, 2017.

It is unclear to the Department that Xcel’s interpretation of the obligation regarding a transfer on July 2017 is correct. As a result, the Department discusses below options that would include the transfer of the “unencumbered cumulative” RDF balance as of December 31, 2017 to MMB (Options 3 and 4 below).

2. *2018 Annual Transfer*

As a result, despite “unencumbered cumulative” RDF balances of about \$13.5 million²⁵ (based on actual data) as of December 31, 2016 and \$21.7 million²⁶ (based on forecasted data) as of December 31, 2017, Xcel proposed to transfer \$14,925,034 on January 15, 2018 as explained below:²⁷

In 2017, the Minnesota Legislature approved that beginning January 15, 2018 any unspent funds are to be transferred to the RDA. In this filing, we are proposing to recover \$14,925,034 for a payment forecasted to be made within 2018, an initiative funded in full through the RDF. This forecasted payment is legislatively mandated.

As described in the background section above, the 2017 legislative changes to Minn. Stat. § 116C.779, subdiv. 1(b)-(d) require the Company to transfer to “the renewable development account” managed by MMB the annual obligation for the storage of dry casks located at the Prairie Island power plant and the Monticello nuclear power plant less the amount necessary to pay its obligations for legislative payments. In 2018, our obligation for the storage of dry casks located at Prairie Island and Monticello is \$31,500,000. If one

²⁵ As shown in Attachment 5 of these comments, Xcel calculated the “unencumbered cumulative” RDF balance as of December 31, 2016 by subtracting the sum of the RDF administrative costs paid up to December 31, 2016, the difference between the grant awards and the unused grant awards, and the amount of other legislative mandates paid up to December 31, 2016 from the cumulative annual obligation for the Prairie Island and Monticello nuclear plant dry cask storage.

²⁶ Source: Attachment 6 of these comments.

²⁷ Source: Petition at page 13.

were to subtract the amount of the 2018 legislative mandates described above [216C.41, 116C.7791, 116C.7792, 116C.779 subdivision 1.f and 116C.779 subdivision 1.g] from the Company's total obligation, it equals the \$14,925,034 the Company must transfer to the MMB pursuant to the 2017 legislative changes.

Given that there is some ambiguity as to the practical application of the new legislation, the Department provides below its analysis of the impact of four different ways to calculate the RDF transfer amount to MMB on the 2018 RDF rate rider factor. To help develop a more complete record for the Commission's consideration, the Department requests that Xcel and any other interested party provide any needed legal analysis of each of these four approaches to calculating the RDF transfer amount to MMB or any other option proposed by a participant in this proceeding, as well as the legal and other reasons for rejecting any option, including but not limited to transparency and accountability concerns.

Option 1: Xcel's proposal

- Keep the unencumbered cumulative RDF balance as of December 31, 2017 in the RDF, and
- Transfer the difference between Xcel's 2018 obligations under subdivisions 1.c and 1.d of Minn. Stat. § 116C.779 (estimated at \$37,607,149) and the amounts of the 2018 legislative mandates (216C.41, 116C.7791, 116C.7792, 116C.779 subdivision 1.f and 116C.779 subdivision 1.g), or \$14,925,034 as calculated by Xcel, to the renewable development account on January 15, 2018.

As noted above, it is not clear whether the difference between Xcel's 2018 obligations and the amounts of the 2018 legislative mandates is equal to \$8,817,885 or \$14,925,034.

As discussed further in section III.C. below and summarized under Attachment 3, assuming that Xcel's proposed 2018 RDA transfer amount of \$14,925,034 is correct, the resulting 2018 RDF factor would be \$0.001522 per kWh under Option 1.

Option 2: Xcel's proposal assuming \$31,500,000 dry cask storage obligation

- Keep the unencumbered cumulative RDF balance as of December 31, 2017 in the RDF, and
- Transfer the difference between Xcel's 2018 obligations under subdivisions 1.c and 1.d of 116C.779 (estimated at \$31,500,000) and the amounts of the 2018 legislative mandates (216C.41, 116C.7791, 116C.7792, 116C.779 subdivision 1.f and 116C.779

subdivision 1.g), or \$8,817,885 to the renewable development account on January 15, 2018.

As summarized in Attachment 8, the Department's calculations show that the 2018 RDF factor would be set at \$0.001318 per kWh under Option 2.

The Department requests the Xcel provide in Reply Comments the correct dry cask storage obligation amount, resulting 2018 RDA transfer amount, and resulting 2018 RDF factor under Option 2.

Option 3: Transfer the 2017 unencumbered cumulative RDF balance to the RDA

- Transfer the unencumbered cumulative RDF balance as of December 31, 2017 to the RDA on January 15, 2018, estimated by the Department to be \$21,730,528²⁸ based on the record to date and
- Transfer the difference between Xcel's 2018 obligations under subdivisions 1.c and 1.d of 116C.779 (dry cask storage) and the amounts of the 2018 legislative mandates (216C.41, 116C.7791, 116C.7792, 116C.779 subdivision 1.f and 116C.779 subdivision 1.g), or \$8,817,885 as calculated assuming dry cask storage obligation of \$31,500,000, to the renewable development account on January 15, 2018, for a total estimated transfer of \$30,548,413.

As summarized in Attachment 9, the Department's calculations show that the 2018 RDF factor should be set at \$0.002044 per kWh under Option 3. For verification purposes and if Xcel confirms that its 2018 dry cask storage obligation estimated at the time of the initial Petition is \$31,500,000, the Department requests that Xcel provide in Reply Comments its calculation of the 2018 RDF factor as well as the expected amount of unencumbered cumulative RDF balance as of December 31, 2017 under Option 3.

The Department notes that Option 3 assumes that the Commission will not take any action on the Crown Hydro grant contract.²⁹ Option 4 is a variant of Option 3 that assumes that the Commission cancels the Crown Hydro RDF grant contract (AH01).

²⁸ Source: Attachment 6 of these comments.

²⁹ The Department addresses the Crown Hydro Contract in section IV below.

Option 4: Transfer the 2017 unencumbered cumulative RDF balance, reflecting cancellation of the Crown Hydro RDF grant contract, to the RDA

- Transfer the unencumbered cumulative RDF balance as of December 31, 2017 to the RDA on January 15, 2018, estimated by the Department at about \$21,730,528 plus the Crown Hydro unused award of (\$5,100,000 - \$1,538,591), or \$25,291,937, based on the record to date, and
- Transfer the difference between Xcel's 2018 obligations under subdivisions 1.c and 1.d of 116C.779 and the amounts of the 2018 legislative mandates (216C.41, 116C.7791, 116C.7792, 116C.779 subdivision 1.f and 116C.779 subdivision 1.g), or \$8,817,885 assuming a 2018 dry cask storage obligation of \$31,500,000, to the renewable development account on January 15, 2018, for a total estimated transfer of \$34,109,822.

As summarized in Attachment 10, the Department's calculations show that the 2018 RDF factor should be set at \$0.002163 per kWh under Option 4. For verification purposes, the Department requests that Xcel provide in Reply Comments its calculation of the 2018 RDF factor as well as the expected amount of unencumbered cumulative RDF balance as of December 31, 2017 under Option 4.

The Department notes that Options 3 and 4, which would result in Xcel transferring the 2017 unencumbered cumulative RDF balance to the RDA, raise the issue of how actual RDF administrative costs after August 2017 will be tracked and accounted for. While payments beginning in 2018 from RDF may not require the same administrative costs for monitoring progress with grant contracts and other factors, it is unclear whether or how the existing grant awards will be monitored. Administrative costs estimated for 2018 and later are not included in the calculation of the 2017 unencumbered cumulative RDF balance, nor is any true-up anticipated for the difference between September 2017-December 2018 forecasted and actual costs. The Department requests that Xcel address in reply comments how administrative costs will be tracked and adjusted as necessary going forward.

The following describes the types of administrative duties needed for grant contracts and other awards from the RDF.

Grant Project Payments. In response to the Commission's June 2, 2010 Order in Docket No. E002/M-09-1145, the Company developed specific criteria regarding whether or not certain RDF grant project payments should qualify for inclusion in the RDF forecast for cost recovery purposes.

In its November 1, 2010 comments in Docket No. E002/M-10-1054, the Department agreed with the criteria as described below since they provide for a reasonable checklist of potential areas where a project may have trouble proceeding. As a result, application of these criteria should help ensure that, rather than setting rates based on the expectation that all projects would proceed as anticipated and later removing costs for projects that had difficulty, projects would have to meet the milestones before the costs are included in rates.

The specific criteria are as follows:

1. Energy Production (EP) Projects: All of the following criteria must be met for costs to be included as known and measurable costs:
 - a. An executed RDF grant contract has been reviewed by the Department and approved by the Commission;
 - b. An executed power purchase agreement (PPA) has been reviewed by the Department and approved by the Commission;
 - c. Any necessary co-financing for the project has been secured;
 - d. Any necessary site lease has been secured; and
 - e. Actual construction activity has been initiated.

The only exception to the above list pertains to energy production projects designed for self-generation purposes. In such cases, the PPA requirement does not apply.

2. Research & Development (R&D) Projects: All of the following criteria must be met for costs to be included as known and measurable costs:
 - a. An executed RDF grant contract has been reviewed by the Department and approved by the Commission;
 - b. At least twelve months of project activity has been completed;
 - c. All RDF grant contract milestone requirements have been completed in a timely manner (within 21 days of the due date) during at least the past twelve months;
 - d. The project is currently within budget (plus or minus 10 percent);
 - e. No outstanding technical issues need to be resolved in order to proceed with the project in a timely manner; and
 - f. Project management stability has been demonstrated, *i.e.*, no unexpected turnover.

The Company proposed to include RDF base-level administrative expenses of \$30,300 as known and measurable RDF administrative costs in 2018. These base-level administrative expenses

cover an RDF grant administrator, RDF advisory group miscellaneous meeting expenses and Clean Energy States Alliance membership dues.

The Department does not object to including base-level administrative expenses as known and measurable expenses, and discusses in Section B below the cap on administrative costs set by the Commission.

B. ADMINISTRATIVE COST CAP

The five percent administrative cost cap was established by the Commission in its April 20, 2001 Order in Docket No. E002/M-00-1583 (*Adopting Proposal for Oversight and Operation of RDF*). The language adopted by the Commission regarding RDF administrative expenses specified that “[i]n no case may these costs exceed five percent (5%) of the fund’s total obligations.” The Commission reaffirmed the five percent cap in an October 5, 2006 Order in the same docket.

The Commission’s March 17, 2011 Order in Docket No. E002/M-10-1054 directed Xcel and the Department to meet to clarify the definition and application of the five-percent cap on administrative expenses associated with the RDF program. In addition, the Company was directed to file a proposal regarding this matter prior to, or as part of, the 2011 RDF rate rider filing.

In Docket No. E002/M-11-1007, the Commission established the calculation of the five-percent cap as follows:³⁰

1. **Actual and Forecasted Calculation.** For informational purposes, the administrative cap percentage will be calculated based on actual and forecasted administrative expenses and grant project disbursements from 2004 to, and including, the second forecasted year in each new annual RDF rate rider filing. Total administrative costs will be divided by total grant project disbursements to compute the overall administrative cap percentage.
2. **Actual Only Calculation.** For compliance purposes, the same computation as described above will be applied but only for actual administrative expenses and grant project

³⁰ Source: Commission’s February 17, 2012 Order *In the Matter of a Petition for Approval of the Renewable Development Fund Annual Report, Tracker Account True-Up, and Request for New 2012 Rate Rider Factor* (Docket No. E002/M-11-1007).

disbursements from 2004 to, and including, the most recent year in which actual costs have been reported.

The first computation (Actual & Forecasted) is used as an indicator regarding whether the administrative cap percentage is expected to increase or decrease going forward. The second computation (Actual Only) verifies whether the administrative cap percentage is equal to, or less than, the five percent administrative cap established by the Commission over the life of the program.

The Department's calculations of administrative costs (3 percent for "Actual Only" up to 2016, 2.9 percent for "Actual & Forecasted" up to 2017 and 2.7 percent for "Forecasted" up to 2018) show that the RDF administrative costs are below the Commission-required five-percent cap on administrative costs.³¹

C. CALCULATION OF THE 2018 RDF RIDER RATE (Option 1)

1. 2016 Actual RDF Expenses (Options 1-4)

Attachment 1 of the Petition describes the Company's 2016 RDF expenses and associated recovery, including:

- \$29,884,404 in 2016 total RDF expenses,
- \$28,983,112 in 2016 RDF expenditures allocated to the Minnesota Jurisdiction,³²
- \$5,279,012 in 2015 final true-up (deficit) to be recovered through the RDF Rider, and
- \$26,683,324 in 2016 RDF Rider revenues.

Based on the 2016 outcome of the Department's updated RDF tracker model as summarized in Attachment 1 of these comments, the Department concludes that Xcel's calculations described above are generally reasonable.

³¹ Source: Attachment 4 to these comments.

³² After subtracting the 2016 Interdepartmental Revenue Refund.

On page 13 of its initial filing in Docket No. E002/M-15-730, Xcel explained that the Interdepartmental Revenue refund corresponded to the revenues collected under the RDF adjustment factor for Interdepartmental Sales that had been inadvertently excluded from total actual revenues reported in the RDF tracker prior to March 2015.

2. *2017 Actual (January-August 2017) and Forecast (September-December 2017) RDF Expenses (Options 1-4)*

Attachment 2 of the Petition describes the Company's 2017 RDF expenses and associated recovery. Actual results are reported for January to August and forecasts are reported for September to December. The 2017 RDF expenses and associated recovery include:

- \$23,639,323 in 2017 total RDF expenditures,
- \$23,517,262 in 2017 RDF expenditures allocated to the Minnesota Jurisdiction,
- \$7,578,800 in 2016 final true-up (deficit) to be recovered through the RDF Rider, and
- \$30,702,375 in 2017 RDF Rider revenues.

Based on the 2017 outcome of the Department's updated RDF tracker model as summarized in Attachment 2 of these comments, the Department concludes that Xcel's calculations described above are generally reasonable.

3. *2018 Forecast (Option 1)*

Attachment 3 of the Petition shows that the Company forecasts total 2018 RDF expenditures to be \$45,911,140 and forecasts 2018 RDF expenditures allocated to the Minnesota Jurisdiction to be \$45,159,247. After adding \$393,687 in estimated under-recovered RDF expenditures at the end of 2017 to the 2018 RDF expenditures allocated to the Minnesota Jurisdiction, the Company identified an amount of \$45,552,934 to be recovered in 2018. The Company then divided this amount by the 2018 sales forecast of 29,935,803,334 kWh to arrive at an RDF rate rider factor of \$0.001522 per kWh for 2018, with an expected cumulative balance of \$0 at the end of 2018.

Based on the 2018 outcome of the Department's updated RDF tracker model as summarized in Attachment 3 of these comments, the Department concludes that Xcel's calculations under Option 1 described above are reasonable.

The Department's calculations of the 2018 RDF factor under Options 2-4 used identical calculations while taking into account the 2018 cost differences under each of these options.³³

³³ Source: Attachments 8-10.

Table 2

2018	Transfer to MMB	RDF Factor (\$/kWh)
Option 1	\$ 14,925,034	0.001522
Option 2	\$ 8,817,885	0.001318
Option 3	\$ 30,548,413	0.002044
Option 4	\$ 34,109,822	0.002163

D. ADMINISTRATIVE COST ALLOCATOR

The Commission's June 11, 2004 Order at point 12 stated:³⁴

The Commission hereby approves Xcel's proposal to revise its cost allocation procedures for administrative costs to allocate the administrative costs of Category A projects to all jurisdictions on the basis of the target funding guidelines adopted for each annual funding cycle.

This decision was based on Xcel's February 9, 2004 Reply Comments in which the Company stated:

... we propose to allocate administrative costs for 2004 year based on the target funding guidelines set for the second funding cycle request for proposal... We would propose that this allocation be reviewed for reasonableness each October in the true-up filing, and adjusted if the proportion of spending among the categories changes with new RDF cycles.

The Department notes that Xcel revised the administrative cost allocator to allocate administrative costs based on the ratio of grant awards by project type to the total Cycle 4 grant awards. The Department concludes that Xcel's proposal is reasonable since the Company is operating under the fourth RDF cycle.

³⁴ Docket No. E002/M-03-2018.

E. COMPLIANCE FILING

Point 5 of the June 28, 2005 Order in Docket No. E002/M-05-109 requires Xcel to include the RDF annual reporting requirements from the Commission's December 23, 2002 Order (2002 Order) as part of its annual tracker account and true-up filing.³⁵

Point 2 of the 2002 Order requires Xcel to report for each Renewable Development Fund project:

- The total amount of money awarded from the fund for the project,
- A schedule of anticipated payments,
- The amount disbursed,
- The amounts recovered in the fuel clause,
- The amounts remaining to be recovered,
- Any adjustments to these amounts due to, for example, penalties or incentive payments provided for the terms of the proposal, and
- Any disparities between the schedule of anticipated payments and actual payments.

Point 8 of the March 17, 2011 Order in Docket No. E002/M-10-1054 (2011 Order) requires Xcel to more accurately fulfill the reporting requirements of Ordering point 3 in the Commission's 2002 Order. Specifically, point 8 of the 2011 Order requires Xcel to report the following, which Xcel has done in its filing with the data indicated below:

Category	Amounts as of December 31, 2016³⁶
The total liability the Company has incurred under Minnesota Statutes 116C.779	\$301,350,000
The Company's aggregate payments for approved renewable development projects and legislative mandates	\$257,598,306
The total amount recovered through the fuel clause adjustment mechanism and RDF rate rider factor for RDF costs	\$12,202,440 (Fuel Clause) \$248,704,482 (RDF Rate Rider)
The unencumbered cumulative balance remaining in the fund	\$13,464,874

³⁵ Order *Varying Rules to Permit Recovery of Renewable Development Fund Expenditures and Requiring Compliance Filing*, Docket No. E002/M-00-1583.

³⁶ Source: Table 4 of Xcel's September 30, 2015 filing in Docket No. E002/M-16-811.

The Department concludes that Xcel has complied with the requirements above.

The Department notes that its calculations under Attachment 5 show the same amounts for Xcel's total liability (after adding Xcel's 2016 liability (\$25,600,000)³⁷ to Xcel's total 2015 liability (\$275,750,000) as provided in Docket No. E002/M-16-811), Xcel's aggregate payments and the unencumbered cumulative RDF balance as of December 31, 2016.

The Department notes that its calculations under Attachment 6 show the following amounts for Xcel's total liability (\$326,950,000, after adding Xcel's 2017 liability (\$25,600,000)³⁸ to Xcel's total 2016 liability) and the unencumbered cumulative RDF balance (\$21,730,528) as of December 31, 2017.

IV. CROWN HYDRO RDF GRANT CONTRACT

On October 30, 2017, the Commission issued a Notice of Comment Period requesting initial comments on the following topic:

- Should the Commission take any action on the Crown Hydro RDF grant contract (AH-01) under Minnesota Laws 2017, Chapter 94, Article 10, Section 29, or other authority?

On May 6, 2002, the Commission issued an Order approving the grant contract for the Crown Hydro project (Project) under the RDF funding in Cycle 1.³⁹ The Project, as initially proposed, was a 3.2 MW hydro-electric generation facility located entirely within the Mills Ruins Park in Minneapolis.⁴⁰ The original grant contract was amended three times. As discussed below, the Department concludes that the last amendment, Third Amendment, is a Commission-approved contract.

Minnesota Laws 2017, Chapter 94, Article 10, Section 29 requires Xcel to notify in writing each person who received a grant funded from the RDF after January 1, 2012, and before January 1, 2012 if the funded project remains incomplete as of the effective date of this section.⁴¹ The notice must inform those RDF grant recipients the conditions under which unexpended funds must be transferred to the clean energy advancement fund account.⁴²

³⁷ Source: Attachment 17 to these comments.

³⁸ *Id.*

³⁹ Docket No. E002/M-00-1583.

⁴⁰ Source: Commission's June 2, 2006 Order in Docket No. E002/M-00-1583, Attachment 19 of these comments.

⁴¹ Source: Attachment 18 to these comments.

⁴² *Id.*

Xcel sent the required notice on June 30, 2017 and stated that “[a]ll of the grantees have indicated that Section 29 will not require them to transfer any unexpended grant funds to the State of Minnesota clean energy advancement fund account at this time.”⁴³

Minnesota Laws 2017, Chapter 94, Article 10, Section 29 requires that a recipient of a RDF grant transfer, no later than 30 days after receiving the notice, any grant funds that remain unexpended as of the effective date of this section to the clean energy advancement fund account if, by that effective date, all of the following conditions are met:⁴⁴

- the grant was awarded more than five years before the effective date of this section;
- the grant recipient has failed to obtain control of the site on which the project is to be constructed;
- the grant recipient has failed to secure all necessary permits or approvals from any unit of government with respect to the project; and
- construction of the project has not begun.

It is the Department’s understanding that Crown Hydro meets only the first three of the four necessary conditions.⁴⁵ However, even if Crown Hydro meets all four conditions and failed to transfer unexpended funds to the clean energy advancement fund account, Minnesota Laws 2017, Chapter 94, Article 10, Section 29 requires Crown Hydro, not Xcel, to transfer the funds.

Given that Crown Hydro is not under the jurisdiction of the Commission, the Department concludes that no Commission action on the Crown Hydro RDF grant contract is needed under Minnesota Laws 2017, Chapter 94, Article 10, Section 29.

The Department notes that Crown Hydro indicated that it did not meet the fourth condition:⁴⁶

Funds are not being returned to Renewable Development Fund (RDF) for two reasons, either one of which results in no funds being returned. First, qualifying conditions under the 2017 Session Law are not met inasmuch as pursuant to Federal Energy Regulatory Commission determination, *construction on the project has begun*. Second, all funds forwarded to date by the RDF, were pursuant to the contract terms, providing reimbursement for funds previously spent.
(emphasis added)

⁴³ Source: Xcel’s September 13, 2017 reply comments at 1-2 in Docket No. E002/M-00-1583.

⁴⁴ Source: Attachment 18 to these comments.

⁴⁵ Source: Attachment A of Xcel’s September 13, 2017 reply comments in Docket No. E002/M-00-1583.

⁴⁶ Source: Attachment A of Xcel’s September 13, 2017 reply comments in Docket No. E002/M-00-1583.

The Department notes also that the Friends of the Lock and Dam (FL&D) appear to suggest that the current Crown Hydro RDF grant contract (Third Amendment) is not a Commission-approved contract.⁴⁷

Based on its review of the record to date, the Department concludes that the Third Amendment, which is the most recent amendment, is a Commission-approved contract for the following reasons. First, the Commission approved the Second Amendment to the RDF grant contract for the Crown Hydro project.⁴⁸ Second, as explained by Xcel, the Third Amendment falls into the category of a "Type 2" contract modification:⁴⁹

The 3rd Amendment provides a revised date by which Crown is to demonstrate site control for the project. All other elements of the grant contract continue unchanged as the remaining timeline is measured relative to the date of site control. The contract amendment falls into the category of a "Type 2" contract modification in the grant administrative process approved by the Minnesota Public Utilities Commission ("Commission") and as such, this filing is being made for informational purposes only and no Commission action is needed.

The Department agrees with Xcel that no Commission action was needed at the time Xcel and Crown Hydro entered into the Third Amendment since Xcel followed the Commission-approved 3-tier administrative process for grant amendments.⁵⁰

Finally, the Department notes that, according to Xcel's third quarter 2017 update on Crown Hydro project status and progress, there appears to be ongoing activity (section highlighted in italic below) related to the Crown Hydro project:⁵¹

AH-01: Crown Hydro *(3.2 MW Hydroelectric Generation Facility)*

Start Date: April 3, 2002

End Date: 400 days from Property Acquisition Date

Grant Amount: \$5,100,000

Funds Invoiced: \$1,538,591

⁴⁷ Source: Footnote 4 of the FL&D August 28, 2017 comments in Docket No. E002/M-00-1583.

⁴⁸ Source: Commission's June 2, 2006 Order in Docket No. E002/M-00-1583, Attachment 19 of these comments.

⁴⁹ Source: Xcel's August 10, 2007 "Crown Hydro Grant Contract - 3rd Amendment" filing in Docket No. E002/M-00-1583, Attachment 20 of these comments.

⁵⁰ Commission's June 28, 2005 Order in Docket No. E002/M-05-109.

⁵¹ Source: Xcel's October 26, 2017 Quarterly Status Report at 3 in Docket No. E002/M-00-1583.

Project Summary: This Renewable Energy Production Project is located on the Mississippi River as it flows through the City of Minneapolis and is designed to provide 3.2 MW of renewable hydropower near the historic St. Anthony Falls Milling District.

Third Quarter Activity: Crown Hydro continues to work toward approval of the amendment to its Federal Energy Regulatory Commission (FERC) license to move the project boundaries to within property controlled by the United States Army Corps of Engineers (USACE) and to extend the dates of the license. In prior quarters, FERC issued a draft Environmental Assessment (EA) for Crown's amendment, which is a first step toward issuing an order on the license. As Crown works on issues raised in the EA they are also waiting to receive FERC's response to EA comments filed by other parties for which the public comment period closed in November of 2016.

Crown continues work with Minnesota State Historic Preservation Office (SHPO) to revise the draft Programmatic Agreement (PA). This includes a revision to the Area of Potential Effect (APE). FERC has requested that the APE be revised to account for indirect effects to historic properties as recommended by SHPO. This would include in part a viewshed study and Phase II intensive study within the APE. The Phase II intensive study is needed to determine direct effects to potentially intact archaeological deposits and structural remains beneath the Corps Parking lot. *Crown held a meeting for consulting parties identified in the draft PA for the purpose to solicit comments to the proposed APE. All governmental agencies and one tribal entity attended. The proposed APE was amended based on FERC and SHPO comments. Plans were made for a subsequent consulting parties meeting and a public meeting to be held in October 2017. Crown has no updates on the litigation previously briefed in previous quarter summary reports.* (emphasis added)

V. DEPARTMENT RECOMMENDATION

The Department concludes that it is unclear whether Xcel's argument that "there were no 'funds in the renewable development account' that were unexpended or unencumbered" is consistent with the requirement to transfer "monies to the RDA on July 1, 2017" as required by Minn. Stat. §116C.779, subdivision 1.b. Thus, to help develop a more complete record for the Commission's consideration, the Department recommends that Xcel and any other interested party provide a legal analysis of the new RDF legislation in support of any of the options described above (Options 1-4) or another option proposed by any participant in this proceeding, as well as the legal and other reasons for rejecting the other options, including but not limited to transparency and accountability concerns.

The Department notes that Options 3 and 4, which would result in Xcel transferring the 2017 unencumbered cumulative RDF balance to the RDA, raise the issue of whether and if so how actual RDF administrative costs after August 2017 would be tracked and accounted for. Administrative costs estimated for 2018 and later are not included in the calculation of the 2017 unencumbered cumulative RDF balance, nor is any true-up anticipated for the difference between September 2017-December 2018 forecasted and actual costs. The Department requests that Xcel address in reply comments how administrative costs would be tracked and adjusted as necessary going forward.

For verification purposes, the Department requests that Xcel provide in reply comments its calculation of the 2018 RDF factor under Option 2, based on the data in the record of its initial filing, corrected for consistency.

For verification purposes, the Department requests that Xcel provide in reply comments its calculation of the 2018 RDF factor as well as the expected amount of unencumbered cumulative RDF balance as of December 31, 2017, under Option 3, based on the data in the record of its initial filing, corrected for consistency.

For verification purposes, the Department requests that Xcel provide in reply comments its calculation of the 2018 RDF factor as well as the expected amount of unencumbered cumulative RDF balance as of December 31, 2017, under Option 4, based on the data in the record of its initial filing, corrected for consistency.

The Department concludes that no Commission action on the Crown Hydro RDF grant contract is needed under Minnesota Laws 2017, Chapter 94, Article 10, Section 29.

The Department intends to file further comments following its review of all parties' comments and/or reply comments as needed.

Attachment 1: Xcel's Actual 2016 RDF Budget (page 1 of 2)

Total Expense	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ -	\$ -	\$ -	\$ -	\$ 958,369	\$ 2,467,107	\$ -	\$ -	\$ -	\$ 2,000,000	\$ -	\$ -
Total Cat A (EP)	\$ -	\$ -	\$ -	\$ -	\$ 958,369	\$ 2,467,107	\$ -	\$ -	\$ -	\$ 2,000,000	\$ -	\$ -
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 184,805	\$ -	\$ 281,726	\$ -	\$ 187,174
Cat Higher Ed	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 719,072	\$ -	\$ -	\$ 4,119,072	\$ -	\$ -
Excelsior	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cat B (RD)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 719,072	\$ 184,805	\$ -	\$ 4,400,798	\$ -	\$ 187,174
IREE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
REP to DOC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ -	\$ 24,411	\$ 551,426	\$ 289,504	\$ 136,789	\$ 61,063	\$ 510,945	\$ 603,300	\$ 405,430	\$ 362,478	\$ 216,024	\$ 352,421
216C.412	\$ -	\$ -	\$ 12,073,296	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7792	\$ 117,445	\$ 51,166	\$ 32,967	\$ 27,746	\$ 35,501	\$ 30,140	\$ 42,470	\$ 27,641	\$ 43,245	\$ 34,428	\$ 38,136	\$ 42,545
Subtotal	\$ 117,445	\$ 75,577	\$ 12,657,689	\$ 317,250	\$ 172,290	\$ 91,203	\$ 553,415	\$ 630,941	\$ 448,675	\$ 396,906	\$ 254,160	\$ 394,966
216C.41 (REPI)	\$ 260,510	\$ 179,730	\$ 284,069	\$ 1,173,869	\$ 151,795	\$ 168,467	\$ 93,219	\$ 149,818	\$ 67,289	\$ 16,630	\$ 246,332	\$ 39,494
Total Cost	\$ 377,954	\$ 255,306	\$ 12,941,758	\$ 1,491,119	\$ 1,282,454	\$ 2,726,776	\$ 1,365,706	\$ 965,564	\$ 515,964	\$ 6,814,334	\$ 500,492	\$ 621,634
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Adm Costs 4	\$ 233	\$ 10	\$ -	\$ 71	\$ -	\$ 9	\$ 5,008	\$ 16,118	\$ -	\$ 2,325	\$ 82	\$ 1,488
Total Adm Costs	\$ 233	\$ 10	\$ -	\$ 71	\$ -	\$ 9	\$ 5,008	\$ 16,118	\$ -	\$ 2,325	\$ 82	\$ 1,488
Total RDF Cost	\$ 378,187	\$ 255,316	\$ 12,941,758	\$ 1,491,190	\$ 1,282,454	\$ 2,726,785	\$ 1,370,714	\$ 981,682	\$ 515,964	\$ 6,816,659	\$ 500,573	\$ 623,122

MN Expense	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ -	\$ -	\$ -	\$ -	\$ 805,162	\$ 2,087,163	\$ -	\$ -	\$ -	\$ 1,672,678	\$ -	\$ -
Total Cat A	\$ -	\$ -	\$ -	\$ -	\$ 805,162	\$ 2,087,163	\$ -	\$ -	\$ -	\$ 1,672,678	\$ -	\$ -
Total Cat B	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 719,072	\$ 184,805	\$ -	\$ 4,400,798	\$ -	\$ 187,174
IREE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
REP to DOC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ -	\$ 24,411	\$ 551,426	\$ 289,504	\$ 136,789	\$ 61,063	\$ 510,945	\$ 603,300	\$ 405,430	\$ 362,478	\$ 216,024	\$ 352,421
216C.412	\$ -	\$ -	\$ 12,073,296	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7792	\$ 117,445	\$ 51,166	\$ 32,967	\$ 27,746	\$ 35,501	\$ 30,140	\$ 42,470	\$ 27,641	\$ 43,245	\$ 34,428	\$ 38,136	\$ 42,545
Subtotal	\$ 117,445	\$ 75,577	\$ 12,657,689	\$ 317,250	\$ 172,290	\$ 91,203	\$ 553,415	\$ 630,941	\$ 448,675	\$ 396,906	\$ 254,160	\$ 394,966
216C.41 (REPI)	\$ 260,510	\$ 179,730	\$ 284,069	\$ 1,173,869	\$ 151,795	\$ 168,467	\$ 93,219	\$ 149,818	\$ 67,289	\$ 16,630	\$ 246,332	\$ 39,494
Total Cost	\$ 377,954	\$ 255,306	\$ 12,941,758	\$ 1,491,119	\$ 1,129,247	\$ 2,346,832	\$ 1,365,706	\$ 965,564	\$ 515,964	\$ 6,487,012	\$ 500,492	\$ 621,634
Admin Cost	\$ 214	\$ 9	\$ -	\$ 65	\$ -	\$ 8	\$ 4,636	\$ 14,917	\$ -	\$ 2,145	\$ 75	\$ 1,372
Total RDF Cost	\$ 378,168	\$ 255,315	\$ 12,941,758	\$ 1,491,184	\$ 1,129,247	\$ 2,346,840	\$ 1,370,342	\$ 980,481	\$ 515,964	\$ 6,489,157	\$ 500,567	\$ 623,006

Attachment 1: Xcel's Actual 2016 RDF Budget (page 2 of 2)

	Jan-16	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16
Previous True Up	\$ 5,279,016											
Expense	\$ 378,168	\$ 255,315	\$ 12,941,758	\$ 1,491,184	\$ 1,129,247	\$ 2,346,840	\$ 1,370,342	\$ 980,481	\$ 515,964	\$ 6,489,157	\$ 500,567	\$ 623,006
Revenue (Xcel)	\$ 1,782,805	\$ 2,188,972	\$ 2,283,198	\$ 1,938,612	\$ 2,051,232	\$ 2,307,596	\$ 2,481,639	\$ 2,869,958	\$ 2,486,841	\$ 2,122,572	\$ 1,960,894	\$ 2,209,007
Interdep Refund	\$ 38,917											
Project Revenues*	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cumul. Balance	\$ 3,835,463	\$ 1,901,806	\$ 12,560,366	\$ 12,112,937	\$ 11,190,952	\$ 11,230,197	\$ 10,118,900	\$ 8,229,423	\$ 6,258,547	\$ 10,625,132	\$ 9,164,805	\$ 7,578,803

Input Data Source:

Xcel's electronic copy of the September 29, 2017 filing in Docket No. E002/M-17-722.

(*) Revenues attributable to RDF contracts, investments or expenditures under Minnesota Staute Section 216B.1645, subdivision 2(a).

Attachment 2: Xcel's Forecasted 2017 RDF Budget (page 1 of 2)

Total Expense	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Total 2017
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ 55,575	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 525,162	\$ 55,575	\$ 58,351	\$ -	\$ -	\$ 694,663
Total Cat A (EP)	\$ 55,575	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 525,162	\$ 55,575	\$ 58,351	\$ -	\$ -	\$ 694,663
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B4	\$ 78,088	\$ -	\$ -	\$ 118,614	\$ 361,742	\$ -	\$ -	\$ 34,518	\$ 374,283	\$ 256,225	\$ 528,512	\$ 89,259	\$ 1,841,241
Cat Higher Ed. Excelsior	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 719,072	\$ 1,000,000	\$ -	\$ 2,050,000	\$ 3,769,072
Total Cat B (RD)	\$ 78,088	\$ -	\$ -	\$ 118,614	\$ 361,742	\$ -	\$ -	\$ 34,518	\$ 1,093,355	\$ 1,256,225	\$ 528,512	\$ 2,139,259	\$ 5,610,313
IREE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000	\$ -	\$ 1,000,000
116C.7791	\$ -	\$ 111,306	\$ 70,110	\$ 398,242	\$ -	\$ 93,925	\$ 373,448	\$ -	\$ 281,654	\$ 337,412	\$ 283,389	\$ 280,078	\$ 2,229,564
216C.412	\$ -	\$ -	\$ 11,868,026	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 11,868,026
116C.7792	\$ 282,941	\$ 79,204	\$ 28,900	\$ 30,270	\$ 18,308	\$ 15,093	\$ 23,789	\$ 19,710	\$ 40,517	\$ 27,290	\$ 32,853	\$ 39,466	\$ 638,339
Subtotal	\$ 282,941	\$ 190,510	\$ 11,967,036	\$ 428,511	\$ 18,308	\$ 109,018	\$ 397,237	\$ 19,710	\$ 322,171	\$ 364,702	\$ 1,316,242	\$ 319,544	\$ 15,735,929
216C.41 (REPI)	\$ 119,103	\$ 109,070	\$ 69,349	\$ 291,793	\$ 79,825	\$ 90,984	\$ 73,018	\$ 80,471	\$ 141,257	\$ 141,257	\$ 141,257	\$ 141,257	\$ 1,478,643
Total Cost	\$ 535,707	\$ 299,580	\$ 12,036,385	\$ 838,919	\$ 459,874	\$ 200,002	\$ 470,255	\$ 659,861	\$ 1,612,358	\$ 1,820,535	\$ 1,986,011	\$ 2,600,060	\$ 23,519,547
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Adm Costs 4	\$ 14	\$ 485	\$ -	\$ -	\$ 150	\$ 979	\$ 2,363	\$ 13,285	\$ 20,000	\$ 2,000	\$ 80,000	\$ 500	\$ 119,776
Total Adm Costs	\$ 14	\$ 485	\$ -	\$ -	\$ 150	\$ 979	\$ 2,363	\$ 13,285	\$ 20,000	\$ 2,000	\$ 80,000	\$ 500	\$ 119,776
Total RDF Cost	\$ 535,721	\$ 300,065	\$ 12,036,385	\$ 838,919	\$ 460,024	\$ 200,981	\$ 472,619	\$ 673,146	\$ 1,632,358	\$ 1,822,535	\$ 2,066,011	\$ 2,600,560	\$ 23,639,323

MN Expense	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Total 2017
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ 46,326	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 440,020	\$ 46,888	\$ 48,690	\$ -	\$ -	\$ 581,924
Total Cat A	\$ 46,326	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 440,020	\$ 46,888	\$ 48,690	\$ -	\$ -	\$ 581,924
Total Cat B	\$ 78,088	\$ -	\$ -	\$ 118,614	\$ 361,742	\$ -	\$ -	\$ 34,518	\$ 1,093,355	\$ 1,256,225	\$ 528,512	\$ 2,139,259	\$ 5,610,313
IREE	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000	\$ -	\$ 1,000,000
116C.7791	\$ -	\$ 111,306	\$ 70,110	\$ 398,242	\$ -	\$ 93,925	\$ 373,448	\$ -	\$ 281,654	\$ 337,412	\$ 283,389	\$ 280,078	\$ 2,229,564
216C.412	\$ -	\$ -	\$ 11,868,026	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 11,868,026
116C.7792	\$ 282,941	\$ 79,204	\$ 28,900	\$ 30,270	\$ 18,308	\$ 15,093	\$ 23,789	\$ 19,710	\$ 40,517	\$ 27,290	\$ 32,853	\$ 39,466	\$ 638,339
Subtotal	\$ 282,941	\$ 190,510	\$ 11,967,036	\$ 428,511	\$ 18,308	\$ 109,018	\$ 397,237	\$ 19,710	\$ 322,171	\$ 364,702	\$ 1,316,242	\$ 319,544	\$ 15,735,929
216C.41 (REPI)	\$ 119,103	\$ 109,070	\$ 69,349	\$ 291,793	\$ 79,825	\$ 90,984	\$ 73,018	\$ 80,471	\$ 141,257	\$ 141,257	\$ 141,257	\$ 141,257	\$ 1,478,643
Total Cost	\$ 526,458	\$ 299,580	\$ 12,036,385	\$ 838,919	\$ 459,874	\$ 200,002	\$ 470,255	\$ 574,718	\$ 1,603,671	\$ 1,810,874	\$ 1,986,011	\$ 2,600,060	\$ 23,406,808
Admin Cost	\$ 13	\$ 446	\$ -	\$ -	\$ 138	\$ 906	\$ 2,193	\$ 12,265	\$ 18,519	\$ 1,843	\$ 73,670	\$ 461	\$ 110,454
Total RDF Cost	\$ 526,471	\$ 300,026	\$ 12,036,385	\$ 838,919	\$ 460,012	\$ 200,908	\$ 472,448	\$ 586,983	\$ 1,622,190	\$ 1,812,717	\$ 2,059,681	\$ 2,600,521	\$ 23,517,262

Attachment 2: Xcel's Forecasted 2017 RDF Budget (page 2 of 2)

OVERALL 2017 RDF TRACKER

	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Total 2017
Previous True Up	\$ 7,578,803												\$ 7,578,803
Expense	\$ 526,471	\$ 300,026	\$ 12,036,385	\$ 838,919	\$ 460,012	\$ 200,908	\$ 472,448	\$ 586,983	\$ 1,622,190	\$ 1,812,717	\$ 2,059,681	\$ 2,600,521	\$ 23,517,262
Revenue	\$ 2,656,591	\$ 2,324,468	\$ 2,605,033	\$ 2,190,291	\$ 2,344,904	\$ 2,651,406	\$ 2,794,394	\$ 2,979,242	\$ 2,626,403	\$ 2,500,161	\$ 2,396,025	\$ 2,630,846	\$ 30,699,762
Other Refund	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Project Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cumul. Balance	\$ 5,448,683	\$ 3,424,242	\$ 12,855,594	\$ 11,504,222	\$ 9,619,331	\$ 7,168,833	\$ 4,846,887	\$ 2,454,629	\$ 1,450,415	\$ 762,972	\$ 426,628	\$ 396,303	\$ 396,303

Input Data Source:

Xcel's electronic copy of the September 29, 2017 filing in Docket No. E002/M-17-722.

(*) Revenues attributable to RDF contracts, investments or expenditures under Minnesota Staute Section 216B.1645, subdivision 2(a).

Attachment 3: Option 1: Xcel's Forecasted 2018 RDF Budget (page 1 of 2)

Total Expense	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ 969,741	\$ 1,850,000	\$ -	\$ -	\$ 1,650,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,469,741
Total Cat A (EP)	\$ 969,741	\$ 1,850,000	\$ -	\$ -	\$ 1,650,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,469,741
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B4	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 27,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 2,753,950
Cat Higher Ed. Excelsior	\$ -	\$ -	\$ -	\$ -	\$ 1,050,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,050,000
Total Cat B (RD)	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
MMB	\$ 14,925,034	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 14,925,034
116C.779 (1.f)	\$ -	\$ 4,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000
116C779 (1.g)	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ 240,635	\$ 242,092	\$ 206,822	\$ 181,749	\$ 195,309	\$ 215,841	\$ 132,477	\$ 279,009	\$ 103,813	\$ 156,952	\$ 142,105	\$ 149,513	\$ 2,246,317
216C.412	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7792	\$ 285,398	\$ 493,628	\$ 143,563	\$ 1,062,457	\$ 27,535	\$ 22,174	\$ 34,504	\$ 19,835	\$ 35,378	\$ 26,560	\$ 30,269	\$ 34,678	\$ 2,215,979
Subtotal	\$ 22,251,067	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 36,987,330
216C.41 (REPI)	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Total Cost	\$ 23,354,202	\$ 7,293,978	\$ 429,297	\$ 1,474,013	\$ 3,001,756	\$ 545,296	\$ 7,018,633	\$ 486,702	\$ 831,500	\$ 355,024	\$ 313,298	\$ 777,146	\$ 45,880,840
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Adm Costs 4	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 5,000	\$ 12,800	\$ 3,000	\$ 2,000	\$ 1,000	\$ 500	\$ 30,300
Total Adm Costs	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 5,000	\$ 12,800	\$ 3,000	\$ 2,000	\$ 1,000	\$ 500	\$ 30,300
Total RDF Cost	\$ 23,355,202	\$ 7,294,978	\$ 430,297	\$ 1,475,013	\$ 3,002,756	\$ 546,296	\$ 7,023,633	\$ 499,502	\$ 834,500	\$ 357,024	\$ 314,298	\$ 777,646	\$ 45,911,140

Attachment 3: Option 1: Xcel's Forecasted 2018 RDF Budget (page 2 of 2)

MN Expense	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ 807,554	\$ 1,538,813	\$ -	\$ -	\$ 1,373,772	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,720,139
Total Cat A	\$ 807,554	\$ 1,538,813	\$ -	\$ -	\$ 1,373,772	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,720,139
Total Cat B (RD)	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
MMB	\$14,925,034	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 14,925,034
116C.779 (1.f)	\$ -	\$ 4,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000
116C779 (1.g)	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ 240,635	\$ 242,092	\$ 206,822	\$ 181,749	\$ 195,309	\$ 215,841	\$ 132,477	\$ 279,009	\$ 103,813	\$ 156,952	\$ 142,105	\$ 149,513	\$ 2,246,317
216C.412	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7792	\$ 285,398	\$ 493,628	\$ 143,563	\$ 1,062,457	\$ 27,535	\$ 22,174	\$ 34,504	\$ 19,835	\$ 35,378	\$ 26,560	\$ 30,269	\$ 34,678	\$ 2,215,979
Subtotal	\$22,251,067	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 36,987,330
216C.41 (REPI)	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Total Cost	\$23,192,014	\$ 6,982,791	\$ 429,297	\$ 1,474,013	\$ 2,725,527	\$ 545,296	\$ 7,018,633	\$ 486,702	\$ 831,500	\$ 355,024	\$ 313,298	\$ 777,146	\$ 45,131,238
Total Adm Costs	\$ 921	\$ 920	\$ 920	\$ 918	\$ 921	\$ 924	\$ 4,635	\$ 11,855	\$ 2,774	\$ 1,841	\$ 920	\$ 460	\$ 28,009
Total RDF Cost	\$23,192,935	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,557	\$ 834,274	\$ 356,865	\$ 314,218	\$ 777,606	\$ 45,159,247

OVERALL 2018 RDF TRACKER

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Previous True Up	\$ 396,303												\$ 396,303
Expense	\$23,192,935	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,557	\$ 834,274	\$ 356,865	\$ 314,218	\$ 777,606	\$ 45,159,247
Revenue	\$ 3,948,661	\$ 3,440,833	\$ 3,690,809	\$ 3,240,377	\$ 3,580,725	\$ 3,958,758	\$ 4,558,562	\$ 4,419,470	\$ 3,804,311	\$ 3,620,193	\$3,470,813	\$ 3,822,040	\$ 45,555,550
Other Refund	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Project Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cumul. Balance	\$ 19,640,577	\$ 23,183,456	\$ 19,922,864	\$ 18,157,418	\$ 17,303,141	\$ 13,890,603	\$ 16,355,309	\$ 12,434,395	\$ 9,464,358	\$ 6,201,029	\$ 3,044,434	\$ (0)	\$ -

Net Expenses** (Thousands)	\$ 45,556
MWh Sales	29,935,803
2018 Factor	0.001522

Input Data Source:

Xcel's electronic copy of the September 29, 2017 filing in Docket No. E002/M-17-722.

(*) Revenues attributable to RDF contracts, investments or expenditures under Minnesota Staute Section 216B.1645, subdivision 2(a).

(**) Net Expenses = Previous True Up + Expense - Other Refund - Project Revenues

Attachment 4 Compliance with the Commission's 5% cap on Administrative Costs

	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actual	Actual	Actual	Actual	Act/For	Forecast	Actuals	Act/Forc	Forecast
(Thousand of \$)	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	04-16	04-17	04-18
1. RDF Grant Payments	\$ 1,917	\$ 3,762	\$ 6,753	\$ 10,384	\$ 3,239	\$ 7,533	\$ 8,326	\$ 6,944	\$ 1,903	\$ 3,143	\$ 681	\$ 2,810	\$ 10,917	\$ 6,305	\$ 8,274	\$ 68,312	\$ 74,617	\$ 82,891
2. Administrative Expenses	\$ 342	\$ 135	\$ 189	\$ 432	\$ 226	\$ 118	\$ 147	\$ 140	\$ 102	\$ 178	\$ 25	\$ 16	\$ 25	\$ 120	\$ 30	\$ 2,075	\$ 2,195	\$ 2,225
3. Ratio of Admin. Expenses	17.9%	3.6%	2.8%	4.2%	7.0%	1.6%	1.8%	2.0%	5.3%	5.7%	3.6%	0.6%	0.2%	1.9%	0.4%	3.0%	2.9%	2.7%

Note: (3) = (2)/(1)

Attachment 5

RDF Grant Payments, Administrative Costs, Other Legislative Mandates Expenditures, Grants Awarded and Unencumbered Cumulative Balance (UCB) as of December 31, 2016

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
1. RDF Grant Payments	\$ 5,782,469	\$ 1,917,257	\$ 3,761,910	\$ 6,753,409	\$ 10,384,215	\$ 3,238,626	\$ 7,533,073	\$ 8,326,385	\$ 6,943,768	\$ 1,902,838	\$ 3,142,993	\$ 680,843
Category A1	\$ 3,759,426	\$ 221,000	\$ 196,000	\$ 965,000	\$ 400,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Category A2	\$ -	\$ -	\$ -	\$ 400,000	\$ 3,436,360	\$ (520,000)	\$ 242,730	\$ 40,910	\$ 1,500,000	\$ -	\$ 344,175	\$ 592,355
Category A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 735,000	\$ 205,090	\$ 3,161,687	\$ 2,400,806	\$ 476,376	\$ 2,118,409	\$ -
Category A4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
a. Total Category A	\$ 3,759,426	\$ 221,000	\$ 196,000	\$ 1,365,000	\$ 3,836,360	\$ 215,000	\$ 447,820	\$ 3,202,597	\$ 3,900,806	\$ 476,376	\$ 2,462,584	\$ 592,355
Category B1	\$ 2,023,043	\$ 1,696,257	\$ 1,410,663	\$ 607,119	\$ 284,012	\$ 62,748	\$ 46,619	\$ -	\$ -	\$ -	\$ -	\$ -
Category B2	\$ -	\$ -	\$ 155,247	\$ 2,781,290	\$ 4,556,661	\$ 2,470,102	\$ 939,061	\$ 201,306	\$ -	\$ 197,741	\$ 31,619	\$ -
Category B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 100,000	\$ 2,928,538	\$ 4,191,475	\$ 3,042,962	\$ 1,228,721	\$ 648,790	\$ 88,488
Category B4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Category Higher Education	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
b. Total Category B	\$ 2,023,043	\$ 1,696,257	\$ 1,565,910	\$ 3,388,409	\$ 4,840,673	\$ 2,632,850	\$ 3,914,218	\$ 4,392,781	\$ 3,042,962	\$ 1,426,462	\$ 680,409	\$ 88,488
c. Excelsior	\$ -	\$ -	\$ 2,000,000	\$ 2,000,000	\$ 1,707,182	\$ 390,776	\$ 3,171,035	\$ 731,007	\$ -	\$ -	\$ -	\$ -
2. Administrative Costs	\$ 207,922	\$ 342,318	\$ 135,367	\$ 188,680	\$ 431,953	\$ 225,704	\$ 118,052	\$ 147,233	\$ 139,627	\$ 101,532	\$ 178,458	\$ 24,781
3. Other Legis. Mandates	\$ 10,037,785	\$ 1,513,010	\$ 4,460,425	\$ 8,015,780	\$ 9,481,846	\$ 16,673,693	\$ 16,744,988	\$ 15,619,529	\$ 14,729,047	\$ 13,325,940	\$ 9,531,959	\$ 21,460,069
Un. of Minnesota/IREE	\$ 10,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,500,000	\$ 5,000,000	\$ 5,000,000	\$ 2,500,000	\$ -	\$ -
216C.41 (REPI)	\$ 37,785	\$ 1,513,010	\$ 4,310,425	\$ 8,015,780	\$ 9,669,335	\$ 9,048,693	\$ 9,757,488	\$ 9,632,029	\$ 9,034,006	\$ 9,017,890	\$ 7,412,900	\$ 5,696,935
AURI Biofuel	\$ -	\$ -	\$ 150,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
MPCA Deposit	\$ -	\$ -	\$ -	\$ -	\$ (4,000,000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Next Generation Initiative	\$ -	\$ -	\$ -	\$ -	\$ 3,812,511	\$ 7,625,000	\$ 3,812,500	\$ -	\$ -	\$ -	\$ -	\$ -
REP Admin. by DOC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 675,000	\$ 987,500	\$ 312,500	\$ -	\$ -	\$ -
116C.7791 (Solar Rebates)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 382,541	\$ 1,808,051	\$ 2,119,059	\$ 3,686,335
216C.412 (Made in MN)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 12,021,295
116C.7792 (Solar Incentive)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 55,503
Total RDF Cost (1+2+3)	\$ 16,028,176	\$ 3,772,585	\$ 8,357,702	\$ 14,957,869	\$ 20,298,014	\$ 20,138,023	\$ 24,396,113	\$ 24,093,147	\$ 21,812,442	\$ 15,330,311	\$ 12,853,410	\$ 22,165,693

	2015	2016	Payments 2003-2016	Grant Awards	Unused Awards	Unencumbered Awards
1. RDF Grant Payments	\$ 2,809,764	\$ 10,917,324	\$ 74,094,874	\$ 107,066,638	\$ 2,684,944	\$ 104,381,694
Category A1	\$ -	\$ -	\$ 5,541,426	\$ 9,302,835	\$ 200,000	\$ 9,102,835
Category A2	\$ -	\$ -	\$ 6,036,530	\$ 7,636,530	\$ 1,600,000	\$ 6,036,530
Category A3	\$ -	\$ -	\$ 9,097,368	\$ 9,112,402	\$ 15,034	\$ 9,097,368
Category A4	\$ 1,072,213	\$ 5,425,476	\$ 6,497,689	\$ 18,738,922	\$ -	\$ 18,738,922
a. Total Category A	\$ 1,072,213	\$ 5,425,476	\$ 27,173,013	\$ 44,790,689	\$ 1,815,034	\$ 42,975,655
Category B1	\$ -	\$ -	\$ 6,130,461	\$ 6,247,566	\$ 117,105	\$ 6,130,461
Category B2	\$ -	\$ -	\$ 11,333,027	\$ 11,804,466	\$ 471,439	\$ 11,333,027
Category B3	\$ 737,551	\$ -	\$ 12,966,525	\$ 13,397,891	\$ 281,366	\$ 13,116,525
Category B4	\$ -	\$ 653,705	\$ 653,705	\$ 10,168,811	\$ -	\$ 10,168,811
Category Higher Education	\$ 1,000,000	\$ 4,838,143	\$ 5,838,143	\$ 10,657,215	\$ -	\$ 10,657,215
b. Total Category B	\$ 1,737,551	\$ 5,491,848	\$ 36,921,861	\$ 52,275,949	\$ 869,910	\$ 51,406,039
c. Excelsior	\$ -	\$ -	\$ 10,000,000	\$ 10,000,000	\$ -	\$ 10,000,000
2. Administrative Costs	\$ 15,742	\$ 25,343	\$ 2,282,712			
3. Other Legis. Mandates	\$ 20,684,911	\$ 18,941,736	\$ 181,220,718			
Un. of Minnesota/IREE	\$ -	\$ -	\$ 25,000,000			
216C.41 (REPI)	\$ 4,652,960	\$ 2,831,220	\$ 90,630,456			
AURI Biofuel	\$ -	\$ -	\$ 150,000			
MPCA Deposit	\$ -	\$ -	\$ (4,000,000)			
Next Generation Initiative	\$ -	\$ -	\$ 15,250,011			
REP Admin. by DOC	\$ -	\$ -	\$ 1,975,000			
116C.7791 (Solar Rebates)	\$ 3,950,536	\$ 3,513,790	\$ 15,460,312			
216C.412 (Made in MN)	\$ 12,014,671	\$ 12,073,296	\$ 36,109,262			
116C.7792 (Solar Incentive)	\$ 66,743	\$ 523,430	\$ 645,677			
Total RDF Cost (1+2+3)	\$ 23,510,416	\$ 29,884,404	\$ 257,598,305			

As of December 31, 2016

1. Amount Credited to RDF in 1000s \$	\$ 301,350
2. Total RDF Administrative Costs Paid in 1000s \$	\$ 2,283
3. Amount of Unencumbered Awards in 1000s \$	\$ 104,382
4. Amount of Other Legislative Mandates Paid in 1000s \$	\$ 181,221
Unencumbered Cumulative RDF Balance in 1000s \$	\$ 13,465

(1-2-3-4)

Attachment 6

RDF Grant Payments, Administrative Costs, Other Legislative Mandates Expenditures, Grants Awarded and Unencumbered Cumulative Balance (UCB) as of December 31, 2017

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
1. RDF Grant Payments	\$ 5,782,469	\$ 1,917,257	\$ 3,761,910	\$ 6,753,409	\$ 10,384,215	\$ 3,238,626	\$ 7,533,073	\$ 8,326,385	\$ 6,943,768	\$ 1,902,838	\$ 3,142,993	\$ 680,843
Category A1	\$ 3,759,426	\$ 221,000	\$ 196,000	\$ 965,000	\$ 400,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Category A2	\$ -	\$ -	\$ -	\$ 400,000	\$ 3,436,360	\$ (520,000)	\$ 242,730	\$ 40,910	\$ 1,500,000	\$ -	\$ 344,175	\$ 592,355
Category A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 735,000	\$ 205,090	\$ 3,161,687	\$ 2,400,806	\$ 476,376	\$ 2,118,409	\$ -
Category A4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
a. Total Category A	\$ 3,759,426	\$ 221,000	\$ 196,000	\$ 1,365,000	\$ 3,836,360	\$ 215,000	\$ 447,820	\$ 3,202,597	\$ 3,900,806	\$ 476,376	\$ 2,462,584	\$ 592,355
Category B1	\$ 2,023,043	\$ 1,696,257	\$ 1,410,663	\$ 607,119	\$ 284,012	\$ 62,748	\$ 46,619	\$ -	\$ -	\$ -	\$ -	\$ -
Category B2	\$ -	\$ -	\$ 155,247	\$ 2,781,290	\$ 4,556,661	\$ 2,470,102	\$ 939,061	\$ 201,306	\$ -	\$ 197,741	\$ 31,619	\$ -
Category B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 100,000	\$ 2,928,538	\$ 4,191,475	\$ 3,042,962	\$ 1,228,721	\$ 648,790	\$ 88,488
Category B4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Category Higher Education	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
b. Total Category B	\$ 2,023,043	\$ 1,696,257	\$ 1,565,910	\$ 3,388,409	\$ 4,840,673	\$ 2,632,850	\$ 3,914,218	\$ 4,392,781	\$ 3,042,962	\$ 1,426,462	\$ 680,409	\$ 88,488
c. Excelsior	\$ -	\$ -	\$ 2,000,000	\$ 2,000,000	\$ 1,707,182	\$ 390,776	\$ 3,171,035	\$ 731,007	\$ -	\$ -	\$ -	\$ -
2. Administrative Costs	\$ 207,922	\$ 342,318	\$ 135,367	\$ 188,680	\$ 431,953	\$ 225,704	\$ 118,052	\$ 147,233	\$ 139,627	\$ 101,532	\$ 178,458	\$ 24,781
3. Other Legis. Mandates	\$ 10,037,785	\$ 1,513,010	\$ 4,460,425	\$ 8,015,780	\$ 9,481,846	\$ 16,673,693	\$ 16,744,988	\$ 15,619,529	\$ 14,729,047	\$ 13,325,940	\$ 9,531,959	\$ 21,460,069
Un. of Minnesota/IREE	\$ 10,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,500,000	\$ 5,000,000	\$ 5,000,000	\$ 2,500,000	\$ -	\$ -
216C.41 (REPI)	\$ 37,785	\$ 1,513,010	\$ 4,310,425	\$ 8,015,780	\$ 9,669,335	\$ 9,048,693	\$ 9,757,488	\$ 9,632,029	\$ 9,034,006	\$ 9,017,890	\$ 7,412,900	\$ 5,696,935
AURI Biofuel	\$ -	\$ -	\$ 150,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
MPCA Deposit	\$ -	\$ -	\$ -	\$ -	\$ (4,000,000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Next Generation Initiative	\$ -	\$ -	\$ -	\$ -	\$ 3,812,511	\$ 7,625,000	\$ 3,812,500	\$ -	\$ -	\$ -	\$ -	\$ -
REP Admin. by DOC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 675,000	\$ 987,500	\$ 312,500	\$ -	\$ -	\$ -
116C.7791 (Solar Rebates)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 382,541	\$ 1,808,051	\$ 2,119,059	\$ 3,686,335
216C.412 (Made in Minnesota)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 12,021,295
116C.7792 (Solar Incentives)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 55,503
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779, subd. 1f (City Benson)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779, subd. 1g (LEA PPA)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779, subd. 1 (MMB)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total RDF Cost (1+2+3)	\$ 16,028,176	\$ 3,772,585	\$ 8,357,702	\$ 14,957,869	\$ 20,298,014	\$ 20,138,023	\$ 24,396,113	\$ 24,093,147	\$ 21,812,442	\$ 15,330,311	\$ 12,853,410	\$ 22,165,693

	2015	2016	2017	Payments 2003-2017	Grant Awards	Unused Awards	Unencumbered Awards
1. RDF Grant Payments	\$ 2,809,764	\$ 10,917,324	\$ 6,304,976	\$ 80,399,850	\$ 107,066,638	\$ 2,684,944	\$ 104,381,694
Category A1	\$ -	\$ -	\$ -	\$ 5,541,426	\$ 9,302,835	\$ 200,000	\$ 9,102,835
Category A2	\$ -	\$ -	\$ -	\$ 6,036,530	\$ 7,636,530	\$ 1,600,000	\$ 6,036,530
Category A3	\$ -	\$ -	\$ -	\$ 9,097,368	\$ 9,112,402	\$ 15,034	\$ 9,097,368
Category A4	\$ 1,072,213	\$ 5,425,476	\$ 694,663	\$ 7,192,352	\$ 18,738,922	\$ -	\$ 18,738,922
a. Total Category A	\$ 1,072,213	\$ 5,425,476	\$ 694,663	\$ 27,867,676	\$ 44,790,689	\$ 1,815,034	\$ 42,975,655
Category B1	\$ -	\$ -	\$ -	\$ 6,130,461	\$ 6,247,566	\$ 117,105	\$ 6,130,461
Category B2	\$ -	\$ -	\$ -	\$ 11,333,027	\$ 11,804,466	\$ 471,439	\$ 11,333,027
Category B3	\$ 737,551	\$ -	\$ -	\$ 12,966,525	\$ 13,397,891	\$ 281,366	\$ 13,116,525
Category B4	\$ -	\$ 653,705	\$ 1,841,241	\$ 2,494,946	\$ 10,168,811	\$ -	\$ 10,168,811
Category Higher Education	\$ 1,000,000	\$ 4,838,143	\$ 3,769,072	\$ 9,607,215	\$ 10,657,215	\$ -	\$ 10,657,215
b. Total Category B	\$ 1,737,551	\$ 5,491,848	\$ 5,610,313	\$ 42,532,174	\$ 52,275,949	\$ 869,910	\$ 51,406,039
c. Excelsior	\$ -	\$ -	\$ -	\$ 10,000,000	\$ 10,000,000	\$ -	\$ 10,000,000
2. Administrative Costs	\$ 15,742	\$ 25,343	\$ 119,776	\$ 2,402,488			
3. Other Legis. Mandates	\$ 20,684,911	\$ 18,941,736	\$ 17,214,571	\$ 198,435,290			
Un. of Minnesota/IREE	\$ -	\$ -	\$ -	\$ 25,000,000			
216C.41 (REPI)	\$ 4,652,960	\$ 2,831,220	\$ 1,478,643	\$ 92,109,099			
AURI Biofuel	\$ -	\$ -	\$ -	\$ 150,000			
MPCA Deposit	\$ -	\$ -	\$ -	\$ (4,000,000)			
Next Generation Initiative	\$ -	\$ -	\$ -	\$ 15,250,011			
REP Admin. by DOC	\$ -	\$ -	\$ -	\$ 1,975,000			
116C.7791 (Solar Rebates)	\$ 3,950,536	\$ 3,513,790	\$ 2,229,564	\$ 17,689,876			
216C.412 (Made in Minnesota)	\$ 12,014,671	\$ 12,073,296	\$ 11,868,026	\$ 47,977,288			
116C.7792 (Solar Incentives)	\$ 66,743	\$ 523,430	\$ 638,339	\$ 1,284,015			
DEED	\$ -	\$ -	\$ 1,000,000	\$ 1,000,000			
116C.779, subd. 1f (City Benson)	\$ -	\$ -	\$ -	\$ -			
116C.779, subd. 1g (LEA PPA)	\$ -	\$ -	\$ -	\$ -			
116C.779, subd. 1 (MMB)	\$ -	\$ -	\$ -	\$ -			
	\$ 23,510,416	\$ 29,884,404	\$ 23,639,323	\$ 281,237,628			

As of December 31, 2017

1. Amount Credited to RDF in 1000s \$	\$ 326,950
2. Total RDF Administrative Costs Paid in 1000s \$	\$ 2,402
3. Amount of Unencumbered Awards in 1000s \$	\$ 104,382
4. Amount of Other Legislative Mandates Paid in 1000s \$	\$ 198,435
Unencumbered Cumulative RDF Balance	\$ 21,730,528

(1-2-3-4)

Attachment 7

Actual (through August 2017) and Forecasted RDF Payments Associated with Legislatively Mandated Programs

Minnesota Statutes	REPI 216C.41	Solar Rebates 116C.7791	Solar Incentive 116C.7792	Made in MN 216C.412	MN 21st Century 2017 Ch 94 Art 1
Up to 2015	\$ 87,799,236	\$ 11,946,522	\$ 122,246	\$ 24,035,966	\$ -
2016	\$ 2,831,220	\$ 3,513,790	\$ 523,430	\$ 12,073,296	\$ -
2017	\$ 1,478,643	\$ 2,229,564	\$ 638,339	\$ 11,868,026	\$ 1,000,000
2018	\$ 619,819	\$ 2,246,317	\$ 2,215,979	\$ -	\$ -
Up to 2018	\$ 92,728,918	\$ 19,936,193	\$ 3,499,994	\$ 47,977,288	\$ 1,000,000

Minnesota Statutes	Benson 116C.779 (1.f)	Laurentian 116C.779 (1.g)	MMB 116C.779
Up to 2016	\$ -	\$ -	\$ -
2017	\$ -	\$ -	\$ -
2018	\$ 4,000,000	\$ 13,600,000	\$ 14,925,034
Up to 2018	\$ 4,000,000	\$ 13,600,000	\$ 14,925,034

Calculation of the 2018 Transfer to MMB Assuming \$31,500,000 Dry Storage Obligation

Forecast	2018
1. RDF Credit	\$ 31,500,000
2. 216C.41	\$ 619,819
3. 116C.7791	\$ 2,246,317
4. 116C.7792	\$ 2,215,979
5. Benson	\$ 4,000,000
6. Laurentian	\$ 13,600,000
2018 Transfer	\$ 8,817,885

(1-2-3-4-5-6)

Attachment 8: Option 2: Xcel's Forecasted 2018 RDF Budget Assuming \$31,500,000 Dry Cask Obligation (page 1 of 2)

Total Expense	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ 969,741	\$ 1,850,000	\$ -	\$ -	\$ 1,650,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,469,741
Total Cat A (EP)	\$ 969,741	\$ 1,850,000	\$ -	\$ -	\$ 1,650,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,469,741
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B4	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 27,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 2,753,950
Cat Higher Ed.	\$ -	\$ -	\$ -	\$ -	\$ 1,050,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,050,000
Excelsior	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cat B (RD)	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
MMB	\$ 8,817,885	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,817,885
116C.779 (1.f)	\$ -	\$ 4,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000
116C779 (1.g)	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ 240,635	\$ 242,092	\$ 206,822	\$ 181,749	\$ 195,309	\$ 215,841	\$ 132,477	\$ 279,009	\$ 103,813	\$ 156,952	\$ 142,105	\$ 149,513	\$ 2,246,317
216C.412	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7792	\$ 285,398	\$ 493,628	\$ 143,563	\$ 1,062,457	\$ 27,535	\$ 22,174	\$ 34,504	\$ 19,835	\$ 35,378	\$ 26,560	\$ 30,269	\$ 34,678	\$ 2,215,979
Subtotal	\$16,143,918	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 30,880,181
216C.41 (REPI)	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Total Cost	\$17,247,053	\$ 7,293,978	\$ 429,297	\$ 1,474,013	\$ 3,001,756	\$ 545,296	\$ 7,018,633	\$ 486,702	\$ 831,500	\$ 355,024	\$ 313,298	\$ 777,146	\$ 39,773,691
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Adm Costs 4	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 5,000	\$ 12,800	\$ 3,000	\$ 2,000	\$ 1,000	\$ 500	\$ 30,300
Total Adm Costs	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 5,000	\$ 12,800	\$ 3,000	\$ 2,000	\$ 1,000	\$ 500	\$ 30,300
Total RDF Cost	\$17,248,053	\$ 7,294,978	\$ 430,297	\$ 1,475,013	\$ 3,002,756	\$ 546,296	\$ 7,023,633	\$ 499,502	\$ 834,500	\$ 357,024	\$ 314,298	\$ 777,646	\$ 39,803,991

Attachment 8: Option 2: Xcel's Forecasted 2018 RDF Budget Assuming \$31,500,000 Dry Cask Obligation (page 2 of 2)

MN Expense	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ 807,554	\$ 1,538,813	\$ -	\$ -	\$ 1,373,772	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,720,139
Total Cat A	\$ 807,554	\$ 1,538,813	\$ -	\$ -	\$ 1,373,772	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,720,139
Total Cat B (RD)	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
MMB	\$ 8,817,885	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,817,885
116C.779 (1.f)	\$ -	\$ 4,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000
116C779 (1.g)	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ 240,635	\$ 242,092	\$ 206,822	\$ 181,749	\$ 195,309	\$ 215,841	\$ 132,477	\$ 279,009	\$ 103,813	\$ 156,952	\$ 142,105	\$ 149,513	\$ 2,246,317
216C.412	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7792	\$ 285,398	\$ 493,628	\$ 143,563	\$ 1,062,457	\$ 27,535	\$ 22,174	\$ 34,504	\$ 19,835	\$ 35,378	\$ 26,560	\$ 30,269	\$ 34,678	\$ 2,215,979
Subtotal	\$16,143,918	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 30,880,181
216C.41 (REPI)	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Total Cost	\$17,084,865	\$ 6,982,791	\$ 429,297	\$ 1,474,013	\$ 2,725,527	\$ 545,296	\$ 7,018,633	\$ 486,702	\$ 831,500	\$ 355,024	\$ 313,298	\$ 777,146	\$ 39,024,089
Total Adm Costs	\$ 921	\$ 920	\$ 920	\$ 918	\$ 921	\$ 924	\$ 4,635	\$ 11,855	\$ 2,774	\$ 1,841	\$ 920	\$ 460	\$ 28,009
Total RDF Cost	\$17,085,786	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,557	\$ 834,274	\$ 356,865	\$ 314,218	\$ 777,606	\$ 39,052,098

OVERALL 2018 RDF TRACKER

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Previous True Up	\$ 396,303												\$ 396,303
Expense	\$17,085,786	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,557	\$ 834,274	\$ 356,865	\$ 314,218	\$ 777,606	\$ 39,052,098
Revenue	\$ 3,419,306	\$ 2,979,557	\$ 3,196,021	\$ 2,805,974	\$ 3,100,695	\$ 3,428,049	\$ 3,947,444	\$ 3,826,999	\$ 3,294,307	\$ 3,134,872	\$ 3,005,518	\$ 3,309,659	\$ 39,448,401
Other Refund	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Project Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cumul. Balance	\$ 14,062,783	\$ 18,066,938	\$ 15,301,133	\$ 13,970,090	\$ 13,595,843	\$ 10,714,014	\$ 13,789,838	\$ 10,461,395	\$ 8,001,362	\$ 5,223,354	\$ 2,532,054	\$ (0)	\$ 0

Net Expenses** (Thousands)	\$ 39,448
MWh Sales	29,935,803
2018 Factor	0.001318

Input Data Source:

Xcel's electronic copy of the September 29, 2017 filing in Docket No. E002/M-17-722.

(*) Revenues attributable to RDF contracts, investments or expenditures under Minnesota Staute Section 216B.1645, subdivision 2(a).

(**) Net Expenses = Previous True Up + Expense - Other Refund - Project Revenues

Attachment 9: Option 3: Forecasted 2018 RDF Budget with MMB Transfer of 2017 RDF Unencumbered Cumulative Balance (page 1 of 2)

Total Expense	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ 969,741	\$ 1,850,000	\$ -	\$ -	\$ 1,650,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,469,741
Total Cat A (EP)	\$ 969,741	\$ 1,850,000	\$ -	\$ -	\$ 1,650,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,469,741
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B4	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 27,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 2,753,950
Cat Higher Ed.	\$ -	\$ -	\$ -	\$ -	\$ 1,050,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,050,000
Excelsior	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cat B (RD)	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
MMB	\$ 30,548,413	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 30,548,413
116C.779 (1.f)	\$ -	\$ 4,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000
116C779 (1.g)	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ 240,635	\$ 242,092	\$ 206,822	\$ 181,749	\$ 195,309	\$ 215,841	\$ 132,477	\$ 279,009	\$ 103,813	\$ 156,952	\$ 142,105	\$ 149,513	\$ 2,246,317
216C.412	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7792	\$ 285,398	\$ 493,628	\$ 143,563	\$ 1,062,457	\$ 27,535	\$ 22,174	\$ 34,504	\$ 19,835	\$ 35,378	\$ 26,560	\$ 30,269	\$ 34,678	\$ 2,215,979
Subtotal	\$37,874,446	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 52,610,709
216C.41 (REPI)	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Total Cost	\$38,977,581	\$ 7,293,978	\$ 429,297	\$ 1,474,013	\$ 3,001,756	\$ 545,296	\$ 7,018,633	\$ 486,702	\$ 831,500	\$ 355,024	\$ 313,298	\$ 777,146	\$ 61,504,219
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Adm Costs 4	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 5,000	\$ 12,800	\$ 3,000	\$ 2,000	\$ 1,000	\$ 500	\$ 30,300
Total Adm Costs	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 5,000	\$ 12,800	\$ 3,000	\$ 2,000	\$ 1,000	\$ 500	\$ 30,300
Total RDF Cost	\$38,978,581	\$ 7,294,978	\$ 430,297	\$ 1,475,013	\$ 3,002,756	\$ 546,296	\$ 7,023,633	\$ 499,502	\$ 834,500	\$ 357,024	\$ 314,298	\$ 777,646	\$ 61,534,519

Attachment 9: Option 3: Forecasted 2018 RDF Budget with MMB Transfer of 2017 RDF Unencumbered Cumulative Balance (page 2 of 2)

MN Expense	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ 807,554	\$ 1,538,813	\$ -	\$ -	\$ 1,373,772	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,720,139
Total Cat A	\$ 807,554	\$ 1,538,813	\$ -	\$ -	\$ 1,373,772	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,720,139
Total Cat B (RD)	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
MMB	\$30,548,413	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 30,548,413
116C.779 (1.f)	\$ -	\$ 4,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000
116C779 (1.g)	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ 240,635	\$ 242,092	\$ 206,822	\$ 181,749	\$ 195,309	\$ 215,841	\$ 132,477	\$ 279,009	\$ 103,813	\$ 156,952	\$ 142,105	\$ 149,513	\$ 2,246,317
216C.412	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7792	\$ 285,398	\$ 493,628	\$ 143,563	\$ 1,062,457	\$ 27,535	\$ 22,174	\$ 34,504	\$ 19,835	\$ 35,378	\$ 26,560	\$ 30,269	\$ 34,678	\$ 2,215,979
Subtotal	\$37,874,446	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 52,610,709
216C.41 (REPI)	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Total Cost	\$38,815,394	\$ 6,982,791	\$ 429,297	\$ 1,474,013	\$ 2,725,527	\$ 545,296	\$ 7,018,633	\$ 486,702	\$ 831,500	\$ 355,024	\$ 313,298	\$ 777,146	\$ 60,754,617
Total Adm Costs	\$ 921	\$ 920	\$ 920	\$ 918	\$ 921	\$ 924	\$ 4,635	\$ 11,855	\$ 2,774	\$ 1,841	\$ 920	\$ 460	\$ 28,009
Total RDF Cost	\$38,816,315	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,557	\$ 834,274	\$ 356,865	\$ 314,218	\$ 777,606	\$ 60,782,626

OVERALL 2018 RDF TRACKER

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Previous True Up	\$ 396,303												\$ 396,303
Expense	\$38,816,315	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,557	\$ 834,274	\$ 356,865	\$ 314,218	\$ 777,606	\$ 60,782,626
Revenue	\$ 5,302,864	\$ 4,620,874	\$ 4,956,580	\$ 4,351,671	\$ 4,808,743	\$ 5,316,422	\$ 6,121,931	\$ 5,935,138	\$ 5,109,008	\$ 4,861,746	\$ 4,661,136	\$ 5,132,817	\$ 61,178,930
Other Refund	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Project Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cumul. Balance	\$ 33,909,754	\$ 36,272,591	\$ 31,746,228	\$ 28,869,488	\$ 26,787,193	\$ 22,016,991	\$ 22,918,327	\$ 17,481,746	\$ 13,207,011	\$ 8,702,130	\$ 4,355,211	\$ (0)	\$ -

Net Expenses** (Thousands)	\$ 61,179
MWh Sales	29,935,803
2018 Factor	0.002044

Input Data Source:

Xcel's electronic copy of the September 29, 2017 filing in Docket No. E002/M-17-722.

(*) Revenues attributable to RDF contracts, investments or expenditures under Minnesota Statute Section 216B.1645, subdivision 2(a).

(**) Net Expenses = Previous True Up + Expense - Other Refund - Project Revenues

Attachment 10: Option 4 Forecasted 2018 RDF Budget with MMB Transfer of 2017 RDF Unencumbered Cumulative Balance and cancelled Crown Hydro (page 1 of 2)

Total Expense	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ 969,741	\$ 1,850,000	\$ -	\$ -	\$ 1,650,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,469,741
Total Cat A (EP)	\$ 969,741	\$ 1,850,000	\$ -	\$ -	\$ 1,650,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,469,741
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B4	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 27,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 2,753,950
Cat Higher Ed.	\$ -	\$ -	\$ -	\$ -	\$ 1,050,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,050,000
Excelsior	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Cat B (RD)	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
MMB	\$34,109,822	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 34,109,822
116C.779 (1.f)	\$ -	\$ 4,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000
116C779 (1.g)	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ 240,635	\$ 242,092	\$ 206,822	\$ 181,749	\$ 195,309	\$ 215,841	\$ 132,477	\$ 279,009	\$ 103,813	\$ 156,952	\$ 142,105	\$ 149,513	\$ 2,246,317
216C.412	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7792	\$ 285,398	\$ 493,628	\$ 143,563	\$ 1,062,457	\$ 27,535	\$ 22,174	\$ 34,504	\$ 19,835	\$ 35,378	\$ 26,560	\$ 30,269	\$ 34,678	\$ 2,215,979
Subtotal	\$41,435,855	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 56,172,118
216C.41 (REPI)	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Total Cost	\$42,538,990	\$ 7,293,978	\$ 429,297	\$ 1,474,013	\$ 3,001,756	\$ 545,296	\$ 7,018,633	\$ 486,702	\$ 831,500	\$ 355,024	\$ 313,298	\$ 777,146	\$ 65,065,628
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Adm Costs 4	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 5,000	\$ 12,800	\$ 3,000	\$ 2,000	\$ 1,000	\$ 500	\$ 30,300
Total Adm Costs	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 1,000	\$ 5,000	\$ 12,800	\$ 3,000	\$ 2,000	\$ 1,000	\$ 500	\$ 30,300
Total RDF Cost	\$42,539,990	\$ 7,294,978	\$ 430,297	\$ 1,475,013	\$ 3,002,756	\$ 546,296	\$ 7,023,633	\$ 499,502	\$ 834,500	\$ 357,024	\$ 314,298	\$ 777,646	\$ 65,095,928

Attachment 10: Option 4 Forecasted 2018 RDF Budget with MMB Transfer of 2017 RDF Unencumbered Cumulative Balance and cancelled Crown Hydro (page 2 of 2)

MN Expense	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ 807,554	\$ 1,538,813	\$ -	\$ -	\$ 1,373,772	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,720,139
Total Cat A	\$ 807,554	\$ 1,538,813	\$ -	\$ -	\$ 1,373,772	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,720,139
Total Cat B (RD)	\$ 81,742	\$ 656,606	\$ 27,260	\$ 178,155	\$ 1,077,260	\$ 255,629	\$ -	\$ 136,206	\$ 640,657	\$ 119,860	\$ 89,272	\$ 541,303	\$ 3,803,950
MMB	\$34,109,822	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 34,109,822
116C.779 (1.f)	\$ -	\$ 4,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000
116C779 (1.g)	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ 240,635	\$ 242,092	\$ 206,822	\$ 181,749	\$ 195,309	\$ 215,841	\$ 132,477	\$ 279,009	\$ 103,813	\$ 156,952	\$ 142,105	\$ 149,513	\$ 2,246,317
216C.412	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7792	\$ 285,398	\$ 493,628	\$ 143,563	\$ 1,062,457	\$ 27,535	\$ 22,174	\$ 34,504	\$ 19,835	\$ 35,378	\$ 26,560	\$ 30,269	\$ 34,678	\$ 2,215,979
Subtotal	\$41,435,855	\$ 4,735,720	\$ 350,385	\$ 1,244,206	\$ 222,844	\$ 238,015	\$ 6,966,981	\$ 298,844	\$ 139,191	\$ 183,512	\$ 172,374	\$ 184,191	\$ 56,172,118
216C.41 (REPI)	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 51,652	\$ 619,819
Total Cost	\$42,376,803	\$ 6,982,791	\$ 429,297	\$ 1,474,013	\$ 2,725,527	\$ 545,296	\$ 7,018,633	\$ 486,702	\$ 831,500	\$ 355,024	\$ 313,298	\$ 777,146	\$ 64,316,026
Total Adm Costs	\$ 921	\$ 920	\$ 920	\$ 918	\$ 921	\$ 924	\$ 4,635	\$ 11,855	\$ 2,774	\$ 1,841	\$ 920	\$ 460	\$ 28,009
Total RDF Cost	\$42,377,724	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,557	\$ 834,274	\$ 356,865	\$ 314,218	\$ 777,606	\$ 64,344,035

OVERALL 2018 RDF TRACKER

	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	Total 2018
Previous True Up	\$ 396,303												\$ 396,303
Expense	\$42,377,724	\$ 6,983,711	\$ 430,217	\$ 1,474,931	\$ 2,726,448	\$ 546,220	\$ 7,023,268	\$ 498,557	\$ 834,274	\$ 356,865	\$ 314,218	\$ 777,606	\$ 64,344,035
Revenue	\$ 5,611,559	\$ 4,889,869	\$ 5,245,117	\$ 4,604,995	\$ 5,088,674	\$ 5,625,907	\$ 6,478,307	\$ 6,280,640	\$ 5,406,419	\$ 5,144,763	\$ 4,932,475	\$ 5,431,614	\$ 64,740,339
Other Refund	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Project Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cumulative Balan	\$ 37,162,468	\$ 39,256,310	\$ 34,441,409	\$ 31,311,345	\$ 28,949,119	\$ 23,869,432	\$ 24,414,392	\$ 18,632,309	\$ 14,060,164	\$ 9,272,265	\$ 4,654,008	\$ (0)	\$ 0

Net Expenses** (Thousands)	\$ 64,740
MWh Sales	29,935,803
2018 Factor	0.002163

Input Data Source:

Xcel's electronic copy of the September 29, 2017 filing in Docket No. E002/M-17-722.

(*) Revenues attributable to RDF contracts, investments or expenditures under Minnesota Staute Section 216B.1645, subdivision 2(a).

(**) Net Expenses = Previous True Up + Expense - Other Refund - Project Revenues

116C.779 FUNDING FOR RENEWABLE DEVELOPMENT.

Subdivision 1. **Renewable development account.** (a) The renewable development account is established as a separate account in the special revenue fund in the state treasury. Appropriations and transfers to the account shall be credited to the account. Earnings, such as interest, dividends, and any other earnings arising from assets of the account, shall be credited to the account. Funds remaining in the account at the end of a fiscal year are not canceled to the general fund but remain in the account until expended. The account shall be administered by the commissioner of management and budget as provided under this section.

(b) On July 1, 2017, the public utility that owns the Prairie Island nuclear generating plant must transfer all funds in the renewable development account previously established under this subdivision and managed by the public utility to the renewable development account established in paragraph (a). Funds awarded to grantees in previous grant cycles that have not yet been expended and unencumbered funds required to be paid in calendar year 2017 under paragraphs (f) and (g), and sections 116C.7792 and 216C.41, are not subject to transfer under this paragraph.

(c) Except as provided in subdivision 1a, beginning January 15, 2018, and continuing each January 15 thereafter, the public utility that owns the Prairie Island nuclear generating plant must transfer to the renewable development account \$500,000 each year for each dry cask containing spent fuel that is located at the Prairie Island power plant for each year the plant is in operation, and \$7,500,000 each year the plant is not in operation if ordered by the commission pursuant to paragraph (i). The fund transfer must be made if nuclear waste is stored in a dry cask at the independent spent-fuel storage facility at Prairie Island for any part of a year.

(d) Except as provided in subdivision 1a, beginning January 15, 2018, and continuing each January 15 thereafter, the public utility that owns the Monticello nuclear generating plant must transfer to the renewable development account \$350,000 each year for each dry cask containing spent fuel that is located at the Monticello nuclear power plant for each year the plant is in operation, and \$5,250,000 each year the plant is not in operation if ordered by the commission pursuant to paragraph (i). The fund transfer must be made if nuclear waste is stored in a dry cask at the independent spent-fuel storage facility at Monticello for any part of a year.

(e) Each year, the public utility shall withhold from the funds transferred to the renewable development account under paragraphs (c) and (d) the amount necessary to pay its obligations under paragraphs (f) and (g), and sections 116C.7792 and 216C.41, for that calendar year.

(f) If the commission approves a new or amended power purchase agreement, the termination of a power purchase agreement, or the purchase and closure of a facility under section 216B.2424, subdivision 9, with an entity that uses poultry litter to generate electricity, the public utility subject to this section shall enter into a contract with the city in which the poultry litter plant is located to provide grants to the city for the purposes of economic development on the following schedule: \$4,000,000 in fiscal year 2018; \$6,500,000 each fiscal year in 2019 and 2020; and \$3,000,000 in fiscal year 2021. The grants shall be paid by the public utility from funds withheld from the transfer to the renewable development account, as provided in paragraphs (b) and (e).

(g) If the commission approves a new or amended power purchase agreement, or the termination of a power purchase agreement under section 216B.2424, subdivision 9, with an entity owned or controlled, directly or indirectly, by two municipal utilities located north of Constitutional Route No. 8, that was previously used to meet the biomass mandate in section 216B.2424, the public utility that owns a nuclear generating plant shall enter into a grant contract with such entity to provide \$6,800,000 per year for five

years, commencing 30 days after the commission approves the new or amended power purchase agreement, or the termination of the power purchase agreement, and on each June 1 thereafter through 2021, to assist the transition required by the new, amended, or terminated power purchase agreement. The grant shall be paid by the public utility from funds withheld from the transfer to the renewable development account as provided in paragraphs (b) and (e).

(h) The collective amount paid under the grant contracts awarded under paragraphs (f) and (g) is limited to the amount deposited into the renewable development account, and its predecessor, the renewable development account, established under this section, that was not required to be deposited into the account under Laws 1994, chapter 641, article 1, section 10.

(i) After discontinuation of operation of the Prairie Island nuclear plant or the Monticello nuclear plant and each year spent nuclear fuel is stored in dry cask at the discontinued facility, the commission shall require the public utility to pay \$7,500,000 for the discontinued Prairie Island facility and \$5,250,000 for the discontinued Monticello facility for any year in which the commission finds, by the preponderance of the evidence, that the public utility did not make a good faith effort to remove the spent nuclear fuel stored at the facility to a permanent or interim storage site out of the state. This determination shall be made at least every two years.

(j) Funds in the account may be expended only for any of the following purposes:

(1) to stimulate research and development of renewable electric energy technologies;

(2) to encourage grid modernization, including, but not limited to, projects that implement electricity storage, load control, and smart meter technology; and

(3) to stimulate other innovative energy projects that reduce demand and increase system efficiency and flexibility.

Expenditures from the fund must benefit Minnesota ratepayers receiving electric service from the utility that owns a nuclear-powered electric generating plant in this state or the Prairie Island Indian community or its members.

The utility that owns a nuclear generating plant is eligible to apply for grants under this subdivision.

(k) For the purposes of paragraph (j), the following terms have the meanings given:

(1) "renewable" has the meaning given in section 216B.2422, subdivision 1, paragraph (c), clauses (1), (2), (4), and (5); and

(2) "grid modernization" means:

(i) enhancing the reliability of the electrical grid;

(ii) improving the security of the electrical grid against cyberthreats and physical threats; and

(iii) increasing energy conservation opportunities by facilitating communication between the utility and its customers through the use of two-way meters, control technologies, energy storage and microgrids, technologies to enable demand response, and other innovative technologies.

(l) A renewable development account advisory group that includes, among others, representatives of the public utility and its ratepayers, and includes at least one representative of the Prairie Island Indian community appointed by that community's tribal council, shall develop recommendations on account

expenditures. The advisory group must design a request for proposal and evaluate projects submitted in response to a request for proposals. The advisory group must utilize an independent third-party expert to evaluate proposals submitted in response to a request for proposal, including all proposals made by the public utility. A request for proposal for research and development under paragraph (j), clause (1), may be limited to or include a request to higher education institutions located in Minnesota for multiple projects authorized under paragraph (j), clause (1). The request for multiple projects may include a provision that exempts the projects from the third-party expert review and instead provides for project evaluation and selection by a merit peer review grant system. In the process of determining request for proposal scope and subject and in evaluating responses to request for proposals, the advisory group must strongly consider, where reasonable, potential benefit to Minnesota citizens and businesses and the utility's ratepayers.

(m) The advisory group shall submit funding recommendations to the public utility, which has full and sole authority to determine which expenditures shall be submitted by the advisory group to the legislature. The commission may approve proposed expenditures, may disapprove proposed expenditures that it finds not to be in compliance with this subdivision or otherwise not in the public interest, and may, if agreed to by the public utility, modify proposed expenditures. The commission shall, by order, submit its funding recommendations to the legislature as provided under paragraph (n).

(n) The commission shall present its recommended appropriations from the account to the senate and house of representatives committees with jurisdiction over energy policy and finance annually by February 15. Expenditures from the account must be appropriated by law. In enacting appropriations from the account, the legislature:

(1) may approve or disapprove, but may not modify, the amount of an appropriation for a project recommended by the commission; and

(2) may not appropriate money for a project the commission has not recommended funding.

(o) A request for proposal for renewable energy generation projects must, when feasible and reasonable, give preference to projects that are most cost-effective for a particular energy source.

(p) The advisory group must annually, by February 15, report to the chairs and ranking minority members of the legislative committees with jurisdiction over energy policy on projects funded by the account for the prior year and all previous years. The report must, to the extent possible and reasonable, itemize the actual and projected financial benefit to the public utility's ratepayers of each project.

(q) By February 1, 2018, and each February 1 thereafter, the commissioner of management and budget shall submit a written report regarding the availability of funds in and obligations of the account to the chairs and ranking minority members of the senate and house committees with jurisdiction over energy policy and finance, the public utility, and the advisory group.

(r) A project receiving funds from the account must produce a written final report that includes sufficient detail for technical readers and a clearly written summary for nontechnical readers. The report must include an evaluation of the project's financial, environmental, and other benefits to the state and the public utility's ratepayers.

(s) Final reports, any mid-project status reports, and renewable development account financial reports must be posted online on a public Web site designated by the commissioner of commerce.

(t) All final reports must acknowledge that the project was made possible in whole or part by the Minnesota renewable development account, noting that the account is financed by the public utility's ratepayers.

(u) Of the amount in the renewable development account, priority must be given to making the payments required under section 216C.417.

Subd. 2. Renewable energy production incentive. (a) Until January 1, 2021, \$10,900,000 annually must be allocated from available funds in the account to fund renewable energy production incentives. \$9,400,000 of this annual amount is for incentives for electricity generated by wind energy conversion systems that are eligible for the incentives under section 216C.41 or Laws 2005, chapter 40.

(b) The balance of this amount, up to \$1,500,000 annually, may be used for production incentives for on-farm biogas recovery facilities and hydroelectric facilities that are eligible for the incentive under section 216C.41 or for production incentives for other renewables, to be provided in the same manner as under section 216C.41.

(c) Any portion of the \$10,900,000 not expended in any calendar year for the incentive is available for other spending purposes under subdivision 1. This subdivision does not create an obligation to contribute funds to the account.

(d) The Department of Commerce shall determine eligibility of projects under section 216C.41 for the purposes of this subdivision. At least quarterly, the Department of Commerce shall notify the public utility of the name and address of each eligible project owner and the amount due to each project under section 216C.41. The public utility shall make payments within 15 working days after receipt of notification of payments due.

Subd. 3. [Repealed, 2017 c 94 art 10 s 30]

History: 1994 c 641 art 1 s 10; 1999 c 200 s 1; 1Sp2003 c 11 art 2 s 1; 1Sp2005 c 1 art 4 s 14; 2007 c 57 art 2 s 9; 2009 c 110 s 1,2; 2010 c 361 art 5 s 2; 2011 c 97 s 2,3; 2012 c 196 s 1,2; 2017 c 94 art 10 s 3

216C.41 RENEWABLE ENERGY PRODUCTION INCENTIVE.

Subdivision 1. **Definitions.** (a) The definitions in this subdivision apply to this section.

(b) "Qualified hydroelectric facility" means a hydroelectric generating facility in this state that:

(1) is located at the site of a dam, if the dam was in existence as of March 31, 1994; and

(2) begins generating electricity after July 1, 1994, or generates electricity after substantial refurbishing of a facility that begins after July 1, 2001.

(c) "Qualified wind energy conversion facility" means a wind energy conversion system in this state that:

(1) produces two megawatts or less of electricity as measured by nameplate rating and begins generating electricity after December 31, 1996, and before July 1, 1999;

(2) begins generating electricity after June 30, 1999, produces two megawatts or less of electricity as measured by nameplate rating, and is:

(i) owned by a resident of Minnesota or an entity that is organized under the laws of this state, is not prohibited from owning agricultural land under section 500.24, and owns the land where the facility is sited;

(ii) owned by a Minnesota small business as defined in section 645.445;

(iii) owned by a Minnesota nonprofit organization;

(iv) owned by a tribal council if the facility is located within the boundaries of the reservation;

(v) owned by a Minnesota municipal utility or a Minnesota cooperative electric association; or

(vi) owned by a Minnesota political subdivision or local government, including, but not limited to, a county, statutory or home rule charter city, town, school district, or any other local or regional governmental organization such as a board, commission, or association; or

(3) begins generating electricity after June 30, 1999, produces seven megawatts or less of electricity as measured by nameplate rating, and:

(i) is owned by a cooperative organized under chapter 308A other than a Minnesota cooperative electric association; and

(ii) all shares and membership in the cooperative are held by an entity that is not prohibited from owning agricultural land under section 500.24.

(d) "Qualified on-farm biogas recovery facility" means an anaerobic digester system that:

(1) is located at the site of an agricultural operation; and

(2) is owned by an entity that is not prohibited from owning agricultural land under section 500.24 and that owns or rents the land where the facility is located.

(e) "Anaerobic digester system" means a system of components that processes animal waste based on the absence of oxygen and produces gas used to generate electricity.

Subd. 2. **Incentive payment; appropriation.** (a) Incentive payments must be made according to this section to (1) a qualified on-farm biogas recovery facility, (2) the owner or operator of a qualified hydropower

facility or qualified wind energy conversion facility for electric energy generated and sold by the facility, (3) a publicly owned hydropower facility for electric energy that is generated by the facility and used by the owner of the facility outside the facility, or (4) the owner of a publicly owned dam that is in need of substantial repair, for electric energy that is generated by a hydropower facility at the dam and the annual incentive payments will be used to fund the structural repairs and replacement of structural components of the dam, or to retire debt incurred to fund those repairs.

(b) Payment may only be made upon receipt by the commissioner of commerce of an incentive payment application that establishes that the applicant is eligible to receive an incentive payment and that satisfies other requirements the commissioner deems necessary. The application must be in a form and submitted at a time the commissioner establishes.

(c) There is annually appropriated from the renewable development account under section 116C.779 to the commissioner of commerce sums sufficient to make the payments required under this section, in addition to the amounts funded by the renewable development account as specified in subdivision 5a.

Subd. 3. **Eligibility window.** Payments may be made under this section only for:

(a) electricity generated from:

(1) a qualified hydroelectric facility that is operational and generating electricity before December 31, 2011;

(2) a qualified wind energy conversion facility that is operational and generating electricity before January 1, 2008; or

(3) a qualified on-farm biogas recovery facility from July 1, 2001, through December 31, 2017; and

(b) gas generated from a qualified on-farm biogas recovery facility from July 1, 2007, through December 31, 2017.

Subd. 4. **Payment period.** (a) A facility may receive payments under this section for a ten-year period. No payment under this section may be made for electricity generated:

(1) by a qualified hydroelectric facility after December 31, 2021;

(2) by a qualified wind energy conversion facility after December 31, 2018; or

(3) by a qualified on-farm biogas recovery facility after December 31, 2017.

(b) The payment period begins and runs consecutively from the date the facility begins generating electricity or, in the case of refurbishment of a hydropower facility, after substantial repairs to the hydropower facility dam funded by the incentive payments are initiated.

Subd. 5. **Amount of payment; wind facilities limit.** (a) An incentive payment is based on the number of kilowatt-hours of electricity generated. The amount of the payment is:

(1) for a facility described under subdivision 2, paragraph (a), clause (4), 1.0 cent per kilowatt-hour; and

(2) for all other facilities, 1.5 cents per kilowatt-hour.

For electricity generated by qualified wind energy conversion facilities, the incentive payment under this section is limited to no more than 200 megawatts of nameplate capacity.

(b) For wind energy conversion systems installed and contracted for after January 1, 2002, the total size of a wind energy conversion system under this section must be determined according to this paragraph. Unless the systems are interconnected with different distribution systems, the nameplate capacity of one wind energy conversion system must be combined with the nameplate capacity of any other wind energy conversion system that is:

- (1) located within five miles of the wind energy conversion system;
- (2) constructed within the same calendar year as the wind energy conversion system; and
- (3) under common ownership.

In the case of a dispute, the commissioner of commerce shall determine the total size of the system, and shall draw all reasonable inferences in favor of combining the systems.

(c) In making a determination under paragraph (b), the commissioner of commerce may determine that two wind energy conversion systems are under common ownership when the underlying ownership structure contains similar persons or entities, even if the ownership shares differ between the two systems. Wind energy conversion systems are not under common ownership solely because the same person or entity provided equity financing for the systems.

Subd. 5a. Renewable development account. The Department of Commerce shall authorize payment of the renewable energy production incentive to wind energy conversion systems that are eligible under this section or Laws 2005, chapter 40, to on-farm biogas recovery facilities, and to hydroelectric facilities. Payment of the incentive shall be made from the renewable energy development account as provided under section 116C.779, subdivision 2.

Subd. 6. Ownership; financing; cure. (a) For the purposes of subdivision 1, paragraph (c), clause (2), a wind energy conversion facility qualifies if it is owned at least 51 percent by one or more of any combination of the entities listed in that clause.

(b) A subsequent owner of a qualified facility may continue to receive the incentive payment for the duration of the original payment period if the subsequent owner qualifies for the incentive under subdivision 1.

(c) Nothing in this section may be construed to deny incentive payment to an otherwise qualified facility that has obtained debt or equity financing for construction or operation as long as the ownership requirements of subdivision 1 and this subdivision are met. If, during the incentive payment period for a qualified facility, the owner of the facility is in default of a lending agreement and the lender takes possession of and operates the facility and makes reasonable efforts to transfer ownership of the facility to an entity other than the lender, the lender may continue to receive the incentive payment for electricity generated and sold by the facility for a period not to exceed 18 months. A lender who takes possession of a facility shall notify the commissioner immediately on taking possession and, at least quarterly, document efforts to transfer ownership of the facility.

(d) If, during the incentive payment period, a qualified facility loses the right to receive the incentive because of changes in ownership, the facility may regain the right to receive the incentive upon cure of the ownership structure that resulted in the loss of eligibility and may reapply for the incentive, but in no case may the payment period be extended beyond the original ten-year limit.

(e) A subsequent or requalifying owner under paragraph (b) or (d) retains the facility's original priority order for incentive payments as long as the ownership structure requalifies within two years from the date the facility became unqualified or two years from the date a lender takes possession.

Subd. 7. **Eligibility process.** (a) A qualifying project is eligible for the incentive on the date the commissioner receives:

(1) an application for payment of the incentive;

(2) one of the following:

(i) a copy of a signed power purchase agreement;

(ii) a copy of a binding agreement other than a power purchase agreement to sell electricity generated by the project to a third person; or

(iii) if the project developer or owner will sell electricity to its own members or customers, a copy of the purchase order for equipment to construct the project with a delivery date and a copy of a signed receipt for a nonrefundable deposit; and

(3) any other information the commissioner deems necessary to determine whether the proposed project qualifies for the incentive under this section.

(b) The commissioner shall determine whether a project qualifies for the incentive and respond in writing to the applicant approving or denying the application within 15 working days of receipt of the information required in paragraph (a). A project that is not operational within 18 months of receipt of a letter of approval is no longer approved for the incentive. The commissioner shall notify an applicant of potential loss of approval not less than 60 days prior to the end of the 18-month period. Eligibility for a project that loses approval may be reestablished as of the date the commissioner receives a new completed application.

History: 1994 c 643 s 71; 1995 c 245 s 4-8; 1997 c 216 s 124; 1999 c 223 art 2 s 34,35; 2000 c 488 art 2 s 15; 2001 c 212 art 5 s 1-3; 1Sp2001 c 4 art 2 s 21; 2002 c 398 s 6; 2003 c 128 art 3 s 44; 1Sp2003 c 11 art 2 s 9-15; 2004 c 228 art 1 s 35,76 subd 10; 2005 c 40 s 1; 2005 c 97 art 9 s 1; 1Sp2005 c 1 art 4 s 51-53; 2006 c 281 art 4 s 12,13; 2006 c 282 art 11 s 10,11; 2007 c 57 art 2 s 29; 2008 c 363 art 6 s 6,7; 2009 c 110 s 31; 2014 c 254 s 14

116C.7791 REBATES FOR SOLAR PHOTOVOLTAIC MODULES.

Subdivision 1. **Definitions.** For the purpose of this section, the following terms have the meanings given.

(a) "Installation" means an array of solar photovoltaic modules attached to a building that will use the electricity generated by the solar photovoltaic modules or placed on a facility or property proximate to that building.

(b) "Manufactured" means:

(1) the material production of solar photovoltaic modules, including the tabbing, stringing, and lamination processes; or

(2) the production of interconnections of low-voltage photoactive elements that produce the final useful photovoltaic output by a manufacturer operating in this state on May 18, 2010.

(c) "Qualified owner" means an owner of a qualified property, but does not include an entity engaged in the business of generating or selling electricity at retail, or an unregulated subsidiary of such an entity.

(d) "Qualified property" means a residence, multifamily residence, business, or publicly owned building located in the assigned service area of the utility subject to section 116C.779.

(e) "Solar photovoltaic module" means the smallest, nondivisible, self-contained physical structure housing interconnected photovoltaic cells and providing a single direct current of electrical output.

Subd. 2. **Establishment.** The utility subject to section 116C.779 shall establish a program to provide rebates to an owner of a qualified property for installing solar photovoltaic modules manufactured in Minnesota after December 31, 2009. Any solar photovoltaic modules installed under this program and any expenses incurred by the utility operating the program shall be treated the same as solar installations and related expenses under section 216B.241.

Subd. 3. **Rebate eligibility.** (a) To be eligible for a rebate under this section, a solar photovoltaic module:

(1) must be manufactured in Minnesota;

(2) must be installed on a qualified property as part of a system whose generating capacity does not exceed 40 kilowatts;

(3) must be certified by Underwriters Laboratory, must have received the ETL listed mark from Intertek, or must have an equivalent certification from an independent testing agency;

(4) may or may not be connected to a utility grid;

(5) must be installed, or reviewed and approved, by a person certified as a solar photovoltaic installer by the North American Board of Certified Energy Practitioners; and

(6) may not be used to sell, transmit, or distribute the electrical energy at retail, nor to provide end-use electricity to an offsite facility of the electrical energy generator. On-site generation is allowed to the extent provided for in section 216B.1611.

(b) To be eligible for a rebate under this section, an applicant must have applied for and been awarded a rebate or other form of financial assistance available exclusively to owners of properties on which solar photovoltaic modules are installed that is offered by:

(1) the utility serving the property on which the solar photovoltaic modules are to be installed; or

(2) this state, under an authority other than this section.

(c) An applicant who is otherwise ineligible for a rebate under paragraph (b) is eligible if the applicant's failure to secure a rebate or other form of financial assistance is due solely to a lack of available funds on the part of a utility or this state.

Subd. 4. Rebate amount and payment. (a) The amount of a rebate under this section is the difference between the sum of all rebates described in subdivision 3, paragraph (b), awarded to the applicant and \$5 per watt of installed generating capacity.

(b) Notwithstanding paragraph (a), the amount of all rebates or other forms of financial assistance awarded to an applicant by a utility and the state, including any rebate paid under this section, net of applicable federal income taxes applied at the highest applicable income tax rates, must not exceed 60 percent of the total installed cost of the solar photovoltaic modules.

(c) Rebates must be awarded to eligible applicants beginning July 1, 2010.

(d) The rebate must be paid out proportionately in five consecutive annual installments.

Subd. 5. Rebate program funding. (a) The following amounts must be allocated from the renewable development account established in section 116C.779 to a separate account for the purpose of providing the rebates for solar photovoltaic modules specified in this section:

(1) \$2,000,000 in fiscal year 2011;

(2) \$4,000,000 in fiscal year 2012;

(3) \$5,000,000 in fiscal year 2013;

(4) \$5,000,000 in fiscal year 2014; and

(5) \$5,000,000 in fiscal year 2015.

(b) If, by the end of fiscal year 2015, insufficient qualified owners have applied for and met the requirements for rebates under this section to exhaust the funds available, any remaining balance shall be returned to the account established under section 116C.779.

History: 2010 c 361 art 5 s 3

116C.7792 SOLAR ENERGY INCENTIVE PROGRAM.

The utility subject to section 116C.779 shall operate a program to provide solar energy production incentives for solar energy systems of no more than a total nameplate capacity of 20 kilowatts direct current. The program shall be operated for eight consecutive calendar years commencing in 2014. \$5,000,000 shall be allocated in each of the first four years, \$15,000,000 in the fifth year, \$10,000,000 in each of the sixth and seventh years, and \$5,000,000 in the eighth year from funds withheld from transfer to the renewable development account under section 116C.779, subdivision 1, paragraphs (b) and (e), and placed in a separate account for the purpose of the solar production incentive program. The solar system must be sized to less than 120 percent of the customer's on-site annual energy consumption. The production incentive must be paid for ten years commencing with the commissioning of the system. The utility must file a plan to operate the program with the commissioner of commerce. The utility may not operate the program until it is approved by the commissioner.

History: 2013 c 85 art 10 s 1; 2017 c 94 art 10 s 4

216C.412 "MADE IN MINNESOTA" SOLAR ENERGY PRODUCTION INCENTIVE ACCOUNT.

Subdivision 1. **Account established; account management.** A "Made in Minnesota" solar energy production incentive account is established as a separate account in the special revenue fund in the state treasury. Earnings, such as interest, dividends, and any other earnings arising from account assets, must be credited to the account. Funds remaining in the account at the end of a fiscal year do not cancel to the general fund but remain in the account. There is annually appropriated from the account to the commissioner of commerce money sufficient to make the incentive payments under section 216C.415, the transfers under section 216C.416, and to administer sections 216C.412 to 216C.415.

Subd. 2. **Payments from public utilities.** (a) Beginning January 1, 2014, and each January 1 thereafter, through 2023, for a total of ten years, each electric public utility subject to section 216B.241 must annually pay to the commissioner of commerce five percent of the minimum amount it is required to spend on energy conservation improvements under section 216B.241, subdivision 1a. Payments under this subdivision must be included in the calculation of whether a utility's other spending on generation exceeds the limits authorized for spending on generation under section 216B.2411, subdivision 1, for investments proposed for commissioner of commerce approval after July 1, 2013. The limits on spending in section 216B.2411 do not limit or apply to payments required by this subdivision. Payments made under this paragraph count toward satisfying expenditure obligations of a public utility under section 216B.241, subdivision 1a. The commissioner shall, upon receipt of the funds, deposit them in the account established in subdivision 1. A public utility subject to this paragraph must be credited energy savings for the purpose of satisfying its energy savings requirement under section 216B.241, subdivision 1c, based on its payment to the commissioner.

(b) Notwithstanding section 116C.779, subdivision 1, paragraph (g), beginning January 1, 2014, and continuing through January 1, 2023, for a total of ten years, the public utility that manages the account under section 116C.779 must annually pay from that account to the commissioner an amount that, when added to the total amount paid to the commissioner of commerce under paragraph (a), totals \$15,000,000 annually. The commissioner shall, upon receipt of the payment, deposit it in the account established in subdivision 1.

History: 2013 c 85 art 11 s 2

216C.412 [Repealed, 2017 c 94 art 10 s 30]

216C.417 PROGRAM ADMINISTRATION; "MADE IN MINNESOTA" SOLAR ENERGY PRODUCTION INCENTIVES.

Subdivision 1. **General provisions.** Payment of a "Made in Minnesota" solar energy production incentive to an owner whose application was approved by the commissioner of commerce under section 216C.415, by May 1, 2017, must be administered under the provisions of Minnesota Statutes 2016, sections 216C.411; 216C.413; 216C.414, subdivisions 1 to 3 and 5; and 216C.415. No incentive payments may be made under this section to an owner whose application was approved by the commissioner after May 1, 2017.

Subd. 2. **Appropriation.** (a) Unspent money remaining in the account established under Minnesota Statutes 2016, section 216C.412, on July 1, 2017, must be transferred to the renewable development account in the special revenue fund established under Minnesota Statutes, section 116C.779, subdivision 1.

(b) There is annually appropriated from the renewable development account in the special revenue fund established in Minnesota Statutes, section 116C.779, to the commissioner of commerce money sufficient to make the incentive payments required under Minnesota Statutes 2016, section 216C.415. Any funds appropriated under this paragraph that are unexpended at the end of a fiscal year cancel to the renewable development account.

(c) Notwithstanding Minnesota Statutes 2016, section 216C.412, subdivision 1, none of this appropriation may be used for administrative costs.

Subd. 3. **Eligibility window; payment duration.** (a) Payments may be made under this subdivision only for solar photovoltaic module installations that meet the requirements of subdivision 1 and that first begin generating electricity between January 1, 2014, and October 31, 2018.

(b) The payment eligibility window of the incentive begins and runs consecutively from the date the solar photovoltaic modules first begins generating electricity.

(c) An owner of solar photovoltaic modules may receive payments under this section for a particular module for a period of ten years, provided that sufficient funds are available in the account.

(d) No payment may be made under this section for electricity generated after October 31, 2028.

History: 2017 c 94 art 10 s 22

CHAPTER 94--S.F.No. 1456

An act relating to state government; appropriating money for jobs and economic development; appropriating money for the Department of Employment and Economic Development, Housing Finance Agency, Department of Labor and Industry, Bureau of Mediation Services, Public Employment Relations Board, Workers' Compensation Court of Appeals, Department of Commerce, Public Utilities Commission, and Public Facilities Authority; making policy and housekeeping changes to labor and industry provisions; making policy changes to employment, economic development, and workforce development provisions; making policy changes to the Department of Iron Range Resources and Rehabilitation; making changes related to workers' compensation; making changes to commerce, energy, and telecommunications policy; making other housing and miscellaneous policy changes; modifying fees; requiring reports; authorizing rulemaking; amending Minnesota Statutes 2016, sections 3.732, subdivision 1; 3.736, subdivision 3; 3.8851, subdivision 1; 15.01; 15.38, subdivision 7; 15A.0815, subdivision 3; 16B.323; 43A.02, subdivision 22; 45.0135, subdivision 6; 46.131, subdivision 7, by adding a subdivision; 65B.84, subdivision 1; 80A.61; 80A.65, subdivision 2; 85.0146, subdivision 1; 116C.779, subdivision 1; 116C.7792; 116D.04, subdivision 1a; 116J.423, subdivision 2; 116J.424; 116J.8731, subdivision 2, by adding a subdivision; 116J.8748, subdivisions 1, 3, 4, 6; 116J.994, subdivisions 3, 5, 7; 116L.17, subdivision 1; 116L.665; 116M.14, subdivision 4; 116M.17, subdivision 4; 116M.18, subdivisions 1a, 4, 4a, 8; 175.45; 176.135, by adding a subdivision; 176.1362, subdivisions 1, 2; 176.275, subdivision 1; 176.285; 176.361, subdivisions 2, 3; 176.521, by adding a subdivision; 176.541, subdivisions 1, 8, by adding a subdivision; 176.611, subdivision 2; 216B.161, subdivision 1; 216B.164, subdivisions 2, 5, 9, by adding a subdivision; 216B.1691, subdivision 2f; 216B.1694, subdivisions 1, 3; 216B.241, subdivisions 1b, 1c, 1d, 2, 5, 5d, 7; 216B.2422, subdivisions 2, 4; 216B.2424, by adding a subdivision; 216B.62, subdivision 3b; 216C.05, subdivision 2; 216C.435, by adding a subdivision; 216H.03, subdivisions 3, 4, 7; 237.162, subdivisions 2, 4, 9, by adding subdivisions; 237.163, subdivisions 2, 4, 6, 7, by adding subdivisions; 276A.01, subdivisions 8, 17; 276A.06, subdivision 8; 282.38, subdivisions 1, 3; 297I.11, subdivision 2; 298.001, subdivision 8, by adding a subdivision; 298.018, subdivision 1; 298.17; 298.22, subdivisions 1, 1a, 5a, 6, 10, 11, by adding subdivisions; 298.221; 298.2211, subdivisions 3, 6; 298.2212; 298.223, subdivisions 1, 2; 298.227; 298.27; 298.28, subdivisions 7, 7a, 9c, 9d, 11; 298.292, subdivision 2; 298.296; 298.2961; 298.297; 298.46, subdivisions 2, 5, 6; 325J.06; 326B.092, subdivision 7; 326B.153, subdivision 1; 326B.37, by adding subdivisions; 326B.435, subdivision 2; 326B.50, subdivision 3, by adding subdivisions; 326B.55, subdivisions 2, 4; 326B.89, subdivisions 1, 5; 327C.01, by adding a subdivision; 345.42, by adding a subdivision; 345.49; 462.355, subdivision 4; 462A.201, subdivision 2; 462A.2035; 462A.204, subdivision 8; 466.03, subdivision 6c; 469.310, subdivision 9; 474A.02, subdivision 21; Laws 2010, chapter 389, article 5, section 7; Laws 2014, chapter 211, section 13, as amended; Laws 2014, chapter 312, article 2, section 14, as amended; Laws 2015, First Special Session chapter 1, article 1, sections 2, subdivision 6; 5, subdivision 2; Laws 2016, chapter 189, article 7, section 46; Laws 2017, chapter 68, article 1, section 1; proposing coding for new law in Minnesota Statutes, chapters 72A; 116J; 175; 176; 216C; 239; 326B; 327C; 462A; 462C; 471; repealing Minnesota Statutes 2016, sections 3.8852; 46.131, subdivision 5; 116C.779, subdivision 3; 116J.549; 174.187; 176.541, subdivision 7; 216B.8109; 216B.811; 216B.812; 216B.813; 216B.815; 216C.411; 216C.412; 216C.413; 216C.414; 216C.415; 216C.416; 298.22, subdivision 8; 298.2213; 298.298; 326B.89, subdivision 14; Laws 2013, chapter 85, article 6, section 11; Minnesota Rules, parts 4355.0100; 4355.0200; 4355.0300; 4355.0400; 4355.0500.

BE IT ENACTED BY THE LEGISLATURE OF THE STATE OF MINNESOTA:

ARTICLE 1
APPROPRIATIONS

Section 1. **JOBS AND ECONOMIC DEVELOPMENT.**

(a) The sums shown in the columns marked "Appropriations" are appropriated to the agencies and for the purposes specified in this article. The appropriations are from the general fund, or another named fund, and are available for the fiscal years indicated for each purpose. The figures "2018" and "2019" used in this article mean that the appropriations listed under them are available for the fiscal year ending June 30, 2018, or June 30, 2019, respectively. "The first year" is fiscal year 2018. "The second year" is fiscal year 2019. "The biennium" is fiscal years 2018 and 2019.

(b) If an appropriation in this article is enacted more than once in the 2017 legislative session, the appropriation must be given effect only once.

APPROPRIATIONS

Available for the Year

Ending June 30

2018

2019

Sec. 2. **DEPARTMENT OF EMPLOYMENT AND ECONOMIC DEVELOPMENT**

<u>Subdivision 1. Total Appropriation</u>	<u>\$</u>	<u>145,400,000</u>	<u>\$</u>	<u>119,478,000</u>
--	------------------	---------------------------	------------------	---------------------------

Appropriations by Fund

	<u>2018</u>	<u>2019</u>
<u>General</u>	<u>\$109,565,000</u>	<u>\$84,747,000</u>
<u>Remediation</u>	<u>\$700,000</u>	<u>\$700,000</u>
<u>Workforce Development</u>	<u>\$34,985,000</u>	<u>\$34,031,000</u>
<u>Special Revenue</u>	<u>\$150,000</u>	<u>-0-</u>

The amounts that may be spent for each purpose are specified in the following subdivisions.

<u>Subd. 2. Business and Community Development</u>	<u>\$</u>	<u>46,074,000</u>	<u>\$</u>	<u>40,935,000</u>
---	------------------	--------------------------	------------------	--------------------------

Appropriations by Fund

<u>General</u>	<u>\$43,363,000</u>	<u>\$38,424,000</u>
<u>Remediation</u>	<u>\$700,000</u>	<u>\$700,000</u>
<u>Workforce Development</u>	<u>\$1,861,000</u>	<u>\$1,811,000</u>
<u>Special Revenue</u>	<u>\$150,000</u>	<u>-0-</u>

develop a method of distributing funds to provide equitable services across workforce service areas.

(jj) In calendar year 2017, the public utility subject to Minnesota Statutes, section 116C.779, must withhold \$1,000,000 from the funds required to fulfill its financial commitments under Minnesota Statutes, section 116C.779, subdivision 1, and pay such amounts to the commissioner of employment and economic development for deposit in the Minnesota 21st century fund under Minnesota Statutes, section 116J.423.

(kk) \$350,000 in fiscal year 2018 is for a grant to AccessAbility Incorporated to provide job skills training to individuals who have been released from incarceration for a felony-level offense and are no more than 12 months from the date of release. AccessAbility Incorporated shall annually report to the commissioner on how the money was spent and the results achieved. The report must include, at a minimum, information and data about the number of participants; participant homelessness, employment, recidivism, and child support compliance; and training provided to program participants.

<u>Subd. 4. General Support Services</u>	<u>\$</u>	<u>4,170,000</u>	<u>\$</u>	<u>4,654,000</u>
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Appropriations by Fund

<u>General Fund</u>	<u>\$4,135,000</u>	<u>\$4,606,000</u>
<u>Workforce Development</u>	<u>\$35,000</u>	<u>\$48,000</u>

(a) \$250,000 each year is for the publication, dissemination, and use of labor market information under Minnesota Statutes, section 116J.401.

(b) \$1,269,000 each year is for transfer to the Minnesota Housing Finance Agency for operating the Olmstead Compliance Office.

(c) \$500,000 each year is for a statewide capacity-building grant program. The commissioner of employment and economic development shall, through a request for proposal process, select a nonprofit organization to administer the capacity-building grant program. The selected organization must have demonstrated experience in providing financial and technical assistance to nonprofit organizations statewide. The selected organization shall provide financial assistance in the form of subgrants and technical assistance to small to medium-sized nonprofit organizations offering, or seeking to offer, workforce or economic development programming that addresses economic disparities in

From: Ritter, Mark G
To: [Guines, Samir \(COMM\)](#)
Cc: [Aschmann, Mara K](#)
Subject: Nuclear Cask storage support
Date: Friday, November 03, 2017 1:10:10 PM
Attachments: [09-0036 Annual Nuclear Waste Management Report 081016 \(NSP\).pdf](#)
[09-0036 Annual Nuclear Waste Management Report 081017 \(NSP\).pdf](#)

Samir

In response to your question regarding support for our annual obligation to the RDF which is based upon the number of casks at PIIC and Monti. Attached are the nuclear Waste Management Reports for 2016 and 2017. Both of these reports are public. Page 3 of each report states the number of casks at each site for 2016 and then for 2017 as well as new casks that will be placed into service. The following table shows how the obligation is then calculated based upon the number of casks at each site. I have included 2015 as the baseline for the cumulative number of casks and total obligation. Please note that the cumulative total of \$301.35M in 2016 coincides with cell B38 of Attachment 14 in our 2018 RDF Rate Rider schedules.

Year	Prairie Island Casks				Monticello Casks				All Casks in Minnesota			
	Casks Placed in Service	Total # Casks	Per Cask Obligation (\$M)	Total Obligation (\$M)	Casks Placed in Service	Total # Casks	Per Cask Obligation (\$M)	Total Obligation (\$M)	Casks Placed in Service	Total Casks	Annual Obligation (\$M)	Cumulative Obligation (\$M)
2015	2	40	\$0.5	\$19.0	0	15	\$0.35	\$5.25	2	55	\$25.25	\$275.75
2016	0	40	\$0.5	\$20.0	1	16	\$0.35	\$5.60	1	56	\$25.60	\$301.35
2017	0	40	\$0.5	\$20.0	0	16	\$0.35	\$5.60	0	56	\$25.60	\$326.95

Mark Ritter

Xcel Energy

RDF Grant Administrator
 401 Nicollet Mall, 7th Floor, Minneapolis, MN 55401
 P: 612.330.6739 F: 612.330.7601
 E: mark.g.ritter@xcelenergy.com

XCELENERGY.COM

Please consider the environment before printing this email.

Sec. 29. RENEWABLE DEVELOPMENT ACCOUNT; TRANSFER OF UNEXPENDED GRANT FUNDS.

(a) No later than 30 days after the effective date of this section, the utility subject to Minnesota Statutes, section 116C.779, subdivision 1, must notify in writing each person who received a grant funded from the renewable development account previously established under that subdivision:

(1) after January 1, 2012; and

(2) before January 1, 2012, if the funded project remains incomplete as of the effective date of this section.

The notice must contain the provisions of this section and instructions directing grant recipients how unexpended funds can be transferred to the clean energy advancement fund account.

(b) A recipient of a grant from the renewable development account previously established under Minnesota Statutes, section 116C.779, subdivision 1, must, no later than 30 days after receiving the notice required under paragraph (a), transfer any grant funds that remain unexpended as of the effective date of this section to the clean energy advancement fund account if, by that effective date, all of the following conditions are met:

(1) the grant was awarded more than five years before the effective date of this section;

(2) the grant recipient has failed to obtain control of the site on which the project is to be constructed;

(3) the grant recipient has failed to secure all necessary permits or approvals from any unit of government with respect to the project; and

(4) construction of the project has not begun.

(c) A recipient of a grant from the renewable development account previously established under Minnesota Statutes, section 116C.779, subdivision 1, must transfer any grant funds that remain unexpended five years after the grant funds are received by the grant recipient if, by that date, the conditions in paragraph (b), clauses (2) to (4), have been met. The grant recipient must transfer the unexpended funds no later than 30 days after the fifth anniversary of the receipt of the grant funds.

(d) A person who transfers funds to the clean energy advancement fund account under this section is eligible to apply for funding from the clean energy advancement fund account.

EFFECTIVE DATE. This section is effective the day following final enactment.

Sec. 30. REPEALER.

(a) Laws 2013, chapter 85, article 6, section 11, is repealed.

(b) Minnesota Statutes 2016, sections 216B.8109; 216B.811; 216B.812; 216B.813; and 216B.815, are repealed.

(c) Minnesota Statutes 2016, sections 3.8852; and 116C.779, subdivision 3, are repealed.

(d) Minnesota Statutes 2016, sections 174.187; 216C.411; 216C.412; 216C.413; 216C.414; 216C.415; and 216C.416, are repealed.

EFFECTIVE DATE. This section is effective the day following final enactment.

ARTICLE 11**HOUSING POLICY**

Section 1. Minnesota Statutes 2016, section 327C.01, is amended by adding a subdivision to read:

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

LeRoy Koppendraye
Ken Nickolai
Marshall Johnson
Phyllis Reha
Thomas Pugh

Chair
Commissioner
Commissioner
Commissioner
Commissioner

Michelle Swanson
Manager, Policy Analysis
Northern States Power Company d/b/a Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401

SERVICE DATE: JUN - 2 2006

DOCKET NO. E-002/M-00-1583

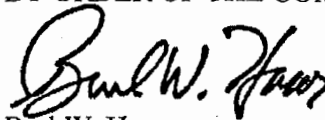
In the Matter of a Request by Northern States Power Company d/b/a Xcel Energy for Approval of a Renewable Development Fund Oversight Process: Update on Crown Hydro Grant Contract Amendment

The above entitled matter has been considered by the Commission and the following disposition made:

Approved the proposed Second Amendment to the RDF grant contract for the Crown Hydro project.

The Commission agrees with and adopts the recommendations of the Department of Commerce which are attached and hereby incorporated in the Order.

BY ORDER OF THE COMMISSION

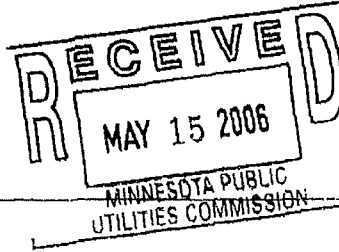


Burl W. Haar
Executive Secretary

(S E A L)

This document can be made available in alternative formats (i.e., large print or audio tape) by calling (651) 201-2202 (voice), or 1-800-627-3529 (TTY relay service).

010



85 7th Place East, Suite 500
St. Paul, Minnesota 55101-2198
651.296.4026 FAX 651.297.1959 TTY 651.297.3067

May 15, 2006

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce**
Docket No. E002/M-00-1583

Dear Dr. Haar:

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

In the Matter of the Request by Northern States Power Company d/b/a Xcel Energy for Approval of a Renewable Development Fund Oversight Process: Update on Crown Hydro Grant Contract Amendment.

The petition was filed on April 14, 2006 by:

Michelle Swanson,
Manager, Policy Analysis
Northern States Power Company d/b/a Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401

The Department recommends **approval**, and is available to answer any questions the Commission may have.

Sincerely,

A handwritten signature in cursive script that reads 'Samir Ouanes'.

SAMIR OUANES
Rate Analyst

SO/jl
Attachment

Market Assurance: 1.800.657.3602
Energy Information: 1.800.657.3710
www.commerce.state.mn.us

Licensing: 1.800.657.3978
Unclaimed Property: 1.800.925.5668
An Equal Opportunity Employer



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET NO. E002/M-00-1583

I. SUMMARY

On April 14, 2006, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed a petition requesting the Minnesota Public Utilities Commission's (Commission) approval of a proposed second amendment (Second Amendment) to the Renewable Development Fund (RDF) grant contract for the Crown Hydro project (Project).

II. BACKGROUND

On April 3, 2002, the Commission issued an Order in Docket No. E002/M-00-1583 approving the selection of the Project for RDF funding in Cycle I, and a grant of \$5.1 million for the Project. The Project, as initially proposed, was a 3.2 MW hydro-electric generation facility located entirely within the Mills Ruins Park in Minneapolis. The Company evaluated the Project as a Category A project (i.e., a project that will result in the actual development of new commercially viable renewable resources).

On May 6, 2002, the Commission issued an Order approving the grant contract for the Project. The time table for the Project, as provided for in the grant contract, included a completed and commissioned 3.2 MW Hydroelectric Power Plant by August 2003.¹

At the request of Crown Hydro, the first amendment to the grant contract of the Project was executed on May 28, 2003. The Department notes that the first amendment was filed with the Commission under Attachment 1 of Xcel's July 14, 2004 1st Funding Cycle Status and Progress

¹ See Exhibits A, B and C of Xcel's March 6, 2002 filing of the Project's grant contract, Attachment 1.

Docket No. E002/M-00-1583
Analyst assigned: Samir Ouanes
Page 2

Report. The first amendment combined the first two milestones into one milestone and extended the Project schedule, including a completed project, to December 15, 2004.²

On May 27, 2004, Xcel filed a letter explaining that the Project had "met the first three milestones [of the first amendment] specified in the contract, and had been paid approximately \$1.5 million to date." The letter indicated that for the Project to proceed, Crown Hydro needed approval of a lease from the Minneapolis Park and Recreational Board. On May 19, 2004, the Board denied approval of the Project's petition for the lease. The Company indicated that there were no additional payments scheduled; the milestones were dependent on lease approval, which had not occurred.

In its October 21, 2005 Quarterly Status Report on the 1st RDF Funding cycle and, more recently, in its April 17, 2006 1st & 2nd Funding Cycle Quarterly Status and Progress Report (pp. 2-3), Xcel indicated that Crown Hydro is pursuing a dual track strategy with respect to the Project's location. The first location option, within the Crown Roller Mill Building, would require obtaining property rights within the building and the right for water to flow through the Mill Ruins Park to get the water from and back to the river. The second option, within the Mill Ruins Park, would require reversal by the Eight Circuit Court of Appeals of the Federal Energy Regulatory Commission (FERC) Order dismissing Crown Hydro's amendment, which proposed to locate the project entirely within the Mill Ruins Park and to use eminent domain to acquire project land.

On January 27, 2006, the Minnesota Commission issued an Order clarifying that it understands Xcel to be stating that the remaining payment milestones under the Crown Hydro grant contract are all construction related and cannot proceed without: (a) site control and (b) approval of all needed permits.³

III. DEPARTMENT ANALYSIS

The Department notes that the main differences between the proposed Second Amendment and the corresponding exhibits of the Commission-approved grant contract (Attachment 1) include:

1. Changes in the format used to describe the due date schedules

The due date schedules are now based on the number of days calculated from "acquisition of property sufficient to comply with Federal Energy Regulatory Commission requirements."

² See Attachment 2.

³ Order point 4 in the matter of a petition by Northern States Power Company d/b/a Xcel Energy for Approval of its Renewable Development Fund Tracker Account Report, True-Up and 2006 Rate Rider Factor, Docket No. E002/M-05-1570.

Docket No. E002/M-00-1583
Analyst assigned: Samir Ouanes
Page 3

In response to discovery from Commission staff with respect to this change, Xcel provided the following explanation:

The dates ("200 days from", etc.) trigger off of the date that "...acquisition of Project property sufficient to comply with Federal Energy Regulatory Commission requirements." It is not a "hard" date but triggers at the time this event occurs. This language is found on the first page of the amendment, under the "Agreement" section. Because they don't know exactly when they will get site control, the project wanted to word the amendment in this manner.

Note that at the bottom of Exhibit C, it states that if acquisition of the property hasn't occurred by July 31, 2006 that the project will be required to give the RDF an acquisition plan and an updated draft amendment. This provides the Board with another opportunity to review the status of the project and a new amendment if they don't have control of the land by July 31, 2006. And as you know, Crown cannot reach their next milestone (and therefore get paid any more funds) until all major contingency issues have been resolved, including securing the site, access for water to the site, etc.

The Department notes that the proposed change in the format used for the calculation of the due date schedule is consistent with the need to ensure that no additional payments from the RDF will be made to Crown Hydro "without site control and before all needed permits are approved." Therefore, the Department does not object to the change described above.

2. Reordering of the Milestones

The two milestones relating to powerhouse construction now precede the two milestones relating to tailrace and forebay construction. In response to discovery from the Department, Xcel stated that the Minneapolis Park Board did not want the park interrupted in the summer months. Crown Hydro would have moved the tailrace/forebay construction milestones later because "powerhouse construction would not greatly affect park operations." The Company also explained that the reordering of milestones poses no additional risk to Xcel's ratepayers in that "the remaining payment milestones ... are all construction related and cannot proceed without site control and before all needed permits are approved."⁴

Therefore, the Department concludes that the reordering of milestones is reasonable.

⁴ See Xcel's response to the Department Information Request No.11, Attachment 3.

Docket No. E002/M-00-1583
Analyst assigned: Samir Ouanes
Page 4

3. Requiring a Detailed Report and an Updated Draft Amendment

Exhibit C of the proposed amendment provides for a detailed report regarding acquisition plans and efforts necessary to achieve acquisition of property and requires a revised amendment if site control for the Project has not been completed by July 31, 2006.

As discussed above, these additional requirements would provide "the Board with another opportunity to review the status of the project and a new amendment if they don't have control of the land by July 31, 2006."

Therefore, the Department concludes that these additional requirements are reasonable.

In response to discovery from the Department, Xcel confirmed that approval of the proposed grant contract would ensure that "Crown cannot receive any additional payments from the fund" before all needed permits are approved, and "until all major issues have been resolved, including securing the site, access for water to the site, updating FERC requirements including environmental assessments, and any permitting needed prior to physical construction."⁵ Therefore, the Department recommends that the Commission approve the proposed Second Amendment to the RDF grant contract for the Project.

IV. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission approve the proposed Second Amendment to the RDF grant contract for the Crown Hydro project.

/j1

⁵ See Attachment 4.

Exhibit A

Docket No. E002/M-00-1583
DOC Attachment 1
Page 1 of 4

Attachment 19
Page 7 of 20

Contract start date: January 1, 2002.

Contract End date: August 31, 2003

Contract term: Twenty Months.

Work Statement

The Scope of Work for the project for which the grant will be utilized is described below. This description is similar to that which appeared in Section 2. Technical aspects of our proposal submitted August 20, 2001.

Generation Description

The proposed facility will be a run of river plant. Minimum and maximum discharge for the plant will be 250 cubic-feet-per-second ("cfs") and 1000 cfs respectively. The turbines for the Crown Hydroelectric project will be two 1700 millimeter ("MM") Runner Diameter Axial-Flow Adjustable Blade turbines directly connected to two 450 Rotations-Per-Minute ("RPM") vertical synchronous generators rated 1750 kilowatts (kw) at 42 feet net head. Each turbine will have a rated flow of 500 cfs. The rated output will be approximately 1.6 MW per each unit.

The Crown Hydroelectric Project will produce approximately 20,000 MWH/yr for the next 50-year period, and the total construction and engineering cost to develop the project is estimated to be approximately \$8.2 million.

Design and Construction

The project will be constructed as a design-build construction project. Construction costs includes final design and construction of the plant, including civil, mechanical and electrical work, construction of a new intake structure, reopening and restoration of the old headrace and tailrace tunnels, powerhouse civil works, installment of turbine/generating and auxiliary equipment, switchgear, transformer and interconnection to Xcel's distribution system. Under the Construction Agreement, Johnson Bros., as the prime construction contractor, shall assume responsibility for providing a functionally complete hydropower generating facility that meets the requirements of the FERC License and is capable of being properly and completely connected to the Xcel distribution system. Johnson Bros. will complete the final design of the Crown Hydroelectric Plant Project, procure all materials and equipment, including turbine generator ("T/G") and control equipment, install all equipment and construct all structures required for the complete assembly and operation of the Project.

The Project is being designed in cooperation with the Minneapolis Park and Recreation Board to compliment the immediate and long-term plans of Mill Ruins Park.

Deliverables

The Deliverables that will be produced as a result of this project are described as follows:

- A Power Purchase Agreement with Xcel or another entity,
- Historic Elements Analysis, Photographic Record and Studies to be incorporated into the Crown Hydroelectric Project,
- A Construction Phase Cultural Resources Management Plan as described in the Technical Project Description, required by the FERC License,
- An Operation and Maintenance Cultural Resources Management Plan as described in the Technical Project Description, also required by the FERC
- A set of Construction Contract Documents for the Construction of the Project and
- The completed and commissioned 3.2 MW Hydroelectric Power Plant.

Exhibit B

Task Deliverables, Schedule

	Task	Deliverable	Due Date
1.	Power Purchase Agreement-	Signed Doc	3/31/02
2.	Photographic Record	Photo - Report	1/15/02
3.	CP CRMP	Document	4/15/02
4.	OMCRMP	Document	4/15/02
5.	Final Design	Plans & Specs	6/15/02
6.	Construction & Commission	Completion	6/30/03
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			

Notes

- Task 3 CPRCMP - Construction Phase Cultural Resources Management plan
This is FERC Requirement and Deliverable
- Task 4 OMCRMP - Operation and Maintenance Cultural Resources Management Plan
This is FERC Requirement
- Task 6 Complete task of constructing facility
The Deliverable is the completed project scheduled for August, 2003

Exhibit C:
Budget, Project Payment Milestones

Total Grant Award: \$5,100,000

Signify which milestones include expenses.

	Project Payment Milestone	Deliverable	Due Date	Payment
1.	Engineering, Design & Permitting	Design & Permitting status report and documents expenses	2/15/02	\$250,000
2.	Engineering, Design & Permitting	Design & Permitting status report and documented expenses	3/31/02	\$150,000
3.	Turbine down payment and Engineering Design & Permitting	Documentation of turbine expenses and documented expenses	4/30/02	\$700,000
4.	Turbine manufacturer progress payments and completion of Engineering Design	Documentation of turbine expenses and documented Engineering expenses and delivery of Contract Documents	6/30/02	\$450,000
5.	Tailrace and tunnel excavation and reconstruction	Documentation of construction costs	9/30/02	\$650,000
6.	Forebay, intake structure and penstock installation	Documentation of construction costs	10/31/02	\$900,000
7.	Powerhouse construction and turbine installation	Documentation of construction costs	11/30/02	\$750,000
8.	Powerhouse construction, electrical and instrumentation	Documentation of construction costs	4/31/03	\$750,000
9.	Completion of startup, testing and commissioning	Commissioning report and acceptance documentation	6/30/03	\$500,000
				Total Payments \$5,100,000



414 Nicollet Mall

Minneapolis, Minnesota 55401-1993

July 14, 2004

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RECEIVED

JUL 14 2004

MINNESOTA PUBLIC UTILITIES COMMISSION

RE: IN THE MATTER OF THE REQUEST BY NORTHERN STATES POWER
COMPANY D/B/A XCEL ENERGY FOR APPROVAL OF A RENEWABLE
DEVELOPMENT FUND OVERSIGHT PROCESS
1ST FUNDING CYCLE STATUS AND PROGRESS REPORT
DOCKET NOS. E002/M-00-1583

Dear Dr. Haar:

Enclosed, please find an original and 15 copies of a status report on the various energy production and research and development projects that are receiving funding from Xcel Energy's Renewable Development Fund. This is the first of what we intend as quarterly reports to furnish the Commission and interested parties with information about the progress being made by these projects.

In addition to providing status updates of RDF projects, we have also suggested some guidelines for dealing with grant contract amendments. We intend to visit this further with the Department. As with the resource acquisition quarterly reports that have been filed over the past couple of years, this progress report is being provided for informational purposes only. We do not request a comment period be established concerning this information. If a party wishes to comment on a specific project we believe they should do so through a request to the Minnesota Public Utilities Commission.

Copies of our report have been provided to all parties on the service list noted above. Please contact me if you have any questions or wish to discuss this further. I can be reached at (612) 904-5366.

Sincerely,

A handwritten signature in cursive script that reads 'Debra Paulson'.

DEBRA J. PAULSON
REGULATORY CASE SPECIALIST

c: Service List

Attach

ATTACHMENT 1
Cycle 1 RDF Project Status Report
Docket No. E002/M-00-1583

Amendments to Various RDF Grant Contracts
Includes (in order of appearance):

Crown Hydro

Department of Commerce-State Energy Office

Science Museum of Minnesota

Pipestone-Jasper School System

AnAerobics Inc (2 amendments)

Sebesta Blomberg & Associates, Inc.

Univ of ND EERC - Co-Firing Biomass (2 amendments)

National Renewable Energy Laboratory-Centrifugal Filter

Colorado School of Mines

National Renewable Energy Laboratory-Titania Solar Cell

Global Energy Concepts, LLC

University of Minnesota, Department of Electrical Engineering

**Northern States Power Co Contract Summary
First Amendment to RDF Contract AH01**

Attached for your review & approval is a Transaction Commitment Agreement between Northern States Power Company and Crown Hydro, LLC., which provides for the Renewable Development Contract. The scope of the Crown Hydro grant is to install a 3.2 MW hydroelectric plant. Basics of the Transaction are as follows:

1. The contractor has requested that the end date be extended to allow contractor to bring this project to a mutually successful completion for all parties.

This contract term is for over one year and this amendment complies with the Risk Management Policy. The Renewable Development Fund Board has authorized schedule changes that are reasonable.

Please contact John Donatell at phone number 612-330-2952, email at john.m.donatell@xcelenergy.com or fax at 612-330-6556 with any questions.

Reminder: Your approval should take no longer than 48 hours. Routing for this contract began on May 19, 2003

DAD APPROVAL ROUTING

**FOR FIRST AMENDMENT TO RDF
CONTRACT AH01**

1. Originator/Dealmaker	Signature & Date	<u>John Donatell</u>	<u>5/19/2003</u>
2. Legal-Chris Clark	Signature & Date	<u>Chris Clark</u>	<u>5/19/2003</u>
3. Transmission-Steve Beuning	Signature & Date	<u>NA</u>	<u>1/1</u>
4. Renewable Development Fund-John Lupo	Signature & Date	<u>John Lupo</u>	<u>5/21/03</u>
5. Manager Renewable Energy Purchases- Price Hatcher	Signature & Date	<u>Price Hatcher</u>	<u>5/21/03</u>
6. Director Purchased Power-Karen Hyde	Signature & Date	<u>Karen Hyde</u>	<u>5/21/03</u>
7. Director, XEM Contract Administration Scott Armonson	Signature & Date	<u>Scott Armonson</u>	<u>5/23/03</u>
8. Managing Director-Energy Accounting Marv McDaniel	Signature & Date	<u>Marv McDaniel</u>	<u>5/23/03</u>
9. VP, Commercial Operations-Kelly Krattenmaker	Signature & Date	<u>Kelly Krattenmaker</u>	<u>5/27/03</u>
10. VP, Risk Management-Jack Dybalski	Signature & Date	<u>Jack Dybalski</u>	<u>5/27/03</u>
11. VP, Resource Planning and Acquisition David Eves	Signature & Date	<u>David Eves</u>	<u>5/29/03</u>

**FIRST AMENDMENT TO
THE CROWN HYDRO, L.L.C DEVELOPMENT FUND GRANT
CONTRACT AND CONDITIONS**

This First Amendment to the Renewable Development Fund Grant Contract Terms and Conditions ("First Amendment") is entered into this 28th day of May of 2003 (the "First Amendment Effective Date"), by and between Northern States Power Company d/b/a Xcel Energy ("NSP") and Crown Hydro, L.L.C. ("Contractor").

RECITALS

Whereas, NSP and Contractor are parties to a Renewable Development Fund Grant ("Agreement") dated January 17, 2002.

Whereas, the Contractor has requested that the contract term be extended to allow Contractor to bring this project to a mutually successful completion at no additional cost to NSP.

NOW, THEREFORE, in consideration of these premises, the mutual promises set forth below and other good and valuable consideration, the receipt and adequacy of which is acknowledged, NSP and Contractor agree to amend the Agreement as follows:

AGREEMENT

Agreement Exhibit B "Task Deliverables, Schedule" is replaced with the new Exhibit B "Task Deliverables, Schedule" dated April 30, 2003.

Agreement Exhibit C "Budget, Project Payment Milestones" is replaced with new Exhibit C "Budget, Project Payment Milestones" dated April 30, 2003.

Agreement Exhibit D "Contract Contacts" is replaced with the new Exhibit D "Contract Contacts" dated April 30, 2003.

IN WITNESS WHEREOF, the parties have caused this First Amendment to be executed by their duly authorized representatives as of the date and year first written above.

Crown Hydro, L.L.C.

By: Thomas R. Griffin

Title: PRESIDENT

THOMAS R. GRIFFIN

Northern States Power Company

David L. Eves

David L. Eves, Vice President
Resource Planning and Acquisition
Xcel Energy Services Inc., for
Northern States Power Company

Exhibit B
Task Deliverables, Schedule

	Task	Deliverable	Due Date
1.	Purchase Power Agreement	Signed Doc	6/15/03
2.	Photographic Record	Photo-Report	6/30/03
3.	CP CRMP	Document	10/31/03
4.	OMCRMP	Document	12/15/03
5.	Final Design	Plans & Specs	7/1/03
6.	Construction & Commission	Completion	12/15/04

Notes

- Task 3- CPCRMP-Construction Phase Cultural Resources Management plan. This is FERC Requirement and Deliverable.
- Task 4 OMCRRMP-Operation and Maintenance Cultural Resources Management Plan. This is FERC Requirement
- Task 6 Complete task of constructing facility
The Deliverable is the completed project scheduled for 12/15/04

Exhibit C:
Budget, Project Payment Milestones

Total Grant Award: \$5,100,000

Signify which milestones include expenses:

	Project Payment Milestone	Deliverable	Due Date	Payment
1.	Engineering, Design & Permitting	Design & Permitting status and documents expenses	7/15/03	\$400,000
2.	Turbine down payment and Engineering Design & Permitting	Documentation of turbine expenses and documented expenses	8/1/03	\$700,000
3.	Turbine manufacturer progress payments and completion of Engineering Design	Documentation of turbine expenses and documented Engineering expenses and delivery of Contract Documents	8/30/03	\$450,000
4.	Tailrace and tunnel excavation and reconstruction	Documentation of construction costs	11/30/03	\$650,000
5.	Forebay, intake structure and penstock installation	Documentation of construction costs	2/15/04	\$900,000
6.	Powerhouse construction and turbine installation	Documentation of construction costs	5/15/04	\$750,000
7.	Powerhouse construction, electrical and instrumentation	Documentation of construction costs	9/15/04	\$750,000
8.	Completion of startup, testing and commissioning	Commissioning report and acceptance documentation	12/15/04	\$500,000

Total Payments \$5,100,000

April 30, 2003

**Exhibit D:
Contract Contacts**

Contractor Contact

Tom Griffin
Crown Hydro
5436 Columbus Ave. S.
Minneapolis, MN 55417
Phone: 612-825-1043
Fax: 612-825-5392
Email: trifhydro1@usfamily.net

Xcel Energy Contract Manager

John Donatell
414 Nicollet Mall (RS-5)
Minneapolis, MN 55401
Phone: 612-330-2952
Fax: 612-330-6556
Email: john.m.Donatell@xcelenergy.com

- Non Public Document - Contains Trade Secret Data
 Public Document - Trade Secret Data
 Public Document

Xcel Energy

Docket No.: E002/M-00-1583

Response To: MN Dept of Commerce Information Request No. 11

Date Received: April 28, 2006

Question:

Reference: April 14, 2006 update on Crown Hydro grant contract amendment.

Please explain why the milestones in the proposed grant contract amendment have been reordered.

Response:

The milestones in the proposed grant contract have been reordered such that the two milestones relating to powerhouse construction now precede the two milestones relating to tailrace and forebay construction. The Minneapolis Park Board has indicated to the project developers that they did not want the park interrupted in the summer months. Because it is the tailrace/forebay construction that would most affect the park, Crown moved those milestones later, and anticipates completing the powerhouse construction milestones prior to that, since powerhouse construction would not greatly affect park operations.

The Renewable Development Fund Advisory Board has reviewed this amendment and supports its approval. The RDF grant amount approved by the Commission for this project has not changed; only the sequence in which the milestone steps will occur has changed. Reordering of milestones poses no additional risk to Xcel Energy ratepayers as the remaining payment milestones under the Crown Hydro grant contract are all construction related and cannot proceed without site control and before all needed permits are approved.

Response By: Michelle Swanson
Title: Manager, Policy Analysis
Department: Government and Regulatory Affairs
Telephone: 612-330-7975
Date: May 8, 2006

- Non Public Document - Contains Tr
 Public Document - Trade Secret Data
 Public Document

Xcel Energy

Docket No.: E002/M-00-1583

Response To: MN Dept of Commerce Information Request No. 12

Date Received: April 28, 2006

Question:

Reference: April 14, 2006 update on Crown Hydro grant contract amendment.

1. Will approval of the proposed grant contract amendment ensure that "Crown cannot receive any additional payments from the fund" before all needed permits are approved, and "until all major issues have been resolved, including securing the site, access for water to the site, updating FERC requirements including environmental assessments, and any permitting needed prior to physical construction?"
2. If the answer to the previous question is no, please fully explain how the proposed grant contract amendment is consistent with Order Point 4 of the Commission's January 27, 2006 Order Approving RDF Rate Rider Factor, Accepting Compliance Filing, and Requiring Filings in Docket No. E002/M-05-1570.

Response:

1. Yes.
2. Not applicable.

Response By: Michelle Swanson
Title: Manager, Policy Analysis
Department: Government and Regulatory Affairs
Telephone: 612-330-7975
Date: May 8, 2006



414 Nicollet Mall
Minneapolis, Minnesota 55401-1993

August 10, 2007

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: XCEL ENERGY RENEWABLE DEVELOPMENT FUND
CROWN HYDRO GRANT CONTRACT – 3RD AMENDMENT
DOCKET NO. E002/M-00-1583

Dear Dr. Haar:

Enclosed please find an original and 15 copies of the third amendment to the Renewable Development Fund (“RDF”) grant contract for the Crown Hydro project (“Crown”). The Crown Hydro project is a 3.2 MW hydroelectric facility awarded a \$5.1 million grant in the first funding cycle of the Renewable Development Fund. The 3rd Amendment provides a revised date by which Crown is to demonstrate site control for the project. All other elements of the grant contract continue unchanged as the remaining timeline is measured relative to the date of site control. The contract amendment falls into the category of a “Type 2” contract modification in the grant administrative process¹ approved by the Minnesota Public Utilities Commission (“Commission”) and as such, this filing is being made for informational purposes only and no Commission action is needed.

Background

The RDF grant contract for the Crown project was approved by the Minnesota Public Utilities Commission (“Commission”) in a May 6, 2002 Order in this docket. Since this time, first and second amendments to the Crown contract were presented and approved through an RDF administrative process approved by the Commission and directly by the Commission in a June 2, 2006 Order.

¹ The Commission approved a proposed 3-tier administrative process for grant contract amendments in association with review and approval of the 2005 RDF Rate Rider Factor. See Commission’s June 28, 2005 Order in Docket No. E002/M-05-109.

Dr. Burl Haar
August 10, 2007
Page 2

As reported in previous quarterly RDF status reports, a third amendment was originally proposed to the RDF Advisory Board (“RDF Board”) in August 2006, however, the RDF Board requested additional information to support Crown’s site acquisition plan, suspending further action on the proposed amendment until further information was received. The RDF Board continued suspension of a 3rd amendment to allow for opportunity to be fully informed by the on-going discussion of the project before the Minneapolis Park and Recreation Board (“MPRB”) in late 2006 through Spring 2007.

A pending feasibility study underway at the direction of the MPRB indicates the MPRB may be expecting to be able to use the results of the study to make a final decision about leasing the site requested by Crown for its project. Study results are anticipated to be complete during the 3rd quarter of 2007. Given the progress made toward a final resolution concerning the site, the RDF Board carefully considered the requested time extension, believed an appropriate action would be to allow Crown a final opportunity to complete site acquisition and approved execution of Crown’s proposed 3rd Grant Contract Amendment.

Grant Status

Grant contract payments made to the project thus far total approximately \$1.5 million. No further RDF payments have been made to Crown since 2003 and since last reviewed by the agencies². This contract amendment does not subject Xcel Energy ratepayers to any additional risk because as with the 2nd grant contract amendment, Crown cannot receive any additional payments from the fund until its next milestone is reached. Remaining payment milestones under the Crown Hydro grant contract are all construction related and cannot proceed without site control and before all needed permits needed prior to physical construction are obtained. Developers of the project continue to invest their own money to advance this project, investing more than \$3 million thus far as further demonstration of their commitment to keep forward motion to this project.

Procedure

The contract amendment falls into the category of a “Type 2” contract modification in the grant administrative process in that the requested

² Crown Hydro milestones and related expenditures were last reviewed by the Department and approved by the Commission in association with review of the 2006 RDF Rate Rider Factor. See Commission’s January 27, 2006 Order in Docket No. E002/M-05-1570.

Dr. Burl Haar
August 10, 2007
Page 3

modification is a change in schedule. As a Type 2 contract change, this filing is being made for informational purposes only and no Commission action is needed. While the Commission's approved grant contract revision process does not require a independent submittal of Type 2 amendments, because of previous general public interest in this project specifically, we are providing this Crown grant contract amendment separate from an RDF quarterly status report but will continue to supply project updates through the quarterly report.

Copies of this grant contract amendment have been served on all parties on the attached service list. Please contact me at (612) 330-7571 if you have any questions regarding this information.

Sincerely,



DEBRA J. PAULSON
MANAGER, REGULATORY ADMINISTRATION

Attachment
c: Service List

**THIRD AMENDMENT TO THE
RENEWABLE DEVELOPMENT FUND GRANT
CONTRACT TERMS AND CONDITIONS**

**BY AND BETWEEN
CROWN HYDRO, L.L.C. AND
NORTHERN STATES POWER COMPANY**

This Third Amendment to the Renewable Development Fund Grant Contract Terms and Conditions ("Amendment") entered into this 15th day of JUNE of 2007 (the "Third Amendment Effective Date"), by and between Northern States Power Company d/b/a Xcel Energy ("NSP") and Crown Hydro, L.L.C. ("Contractor").

RECITALS

Whereas, NSP and Contractor are parties to a Renewable Development Fund Grant Contract Terms and Conditions ("Agreement") dated January 17, 2002, and a First Amendment to the Crown Hydro L.L.C. Development Fund Grant Contract Terms and Conditions dated May 28, 2003, and a Second Amendment dated April 13, 2006.

Whereas, the Contractor has requested that the contract term be extended to allow this project to a mutually successful completion at no additional cost to NSP.

NOW, THEREFORE, in consideration of these premises, the mutual promises set forth below and other good and valuable consideration, the receipt and adequacy of which is acknowledged, NSP and Contractor agree to amend the Agreement as follows:

AGREEMENT

Exhibit C to the Agreement is replaced with Third Amended Exhibit C, attached hereto, the dates of which shall be calculated from acquisition of Project property sufficient to comply with Federal Energy Regulatory Commission requirements.

IN WITNESS WHEREOF, the parties have caused this Third Amendment to be executed by their duly authorized representative as of the date and year first written above.

Crown Hydro, L.L.C.

By: Thomas R. Griffin

Name: THOMAS R. GRIFFIN

Title: PRESIDENT

Thomas R. Griffin
5885 139th St. W.
Apple Valley, MN 55124

Northern States Power Company

By: Debra J. Paulson

Name: Debra J. Paulson

Title: Manager Regulatory Administration

Xcel Energy Services, Inc., for
Northern States Power Company

Third Amended
Exhibit C:
Budget, Project Payment Milestones

Total Grant Award: \$5,100,000

Signify which milestone include expenses:

	Project Payment Milestone	Deliverable	Due Date (in days)	Payment
1.	Engineering, Design & Permitting	Design & Permitting status and documents expenses	Met	\$400,000
2.	Turbine down payment and Engineering Design & Permitting	Documentation of turbine expenses and documented expenses	Met	\$700,000
3.	Turbine manufacturer progress payments and completion of Engineering Design	Documentation of turbine expenses and documented Engineering expenses and delivery of Contract Documents	Met	\$450,000
4.	Powerhouse construction and turbine installation	Documentation of construction costs	200	\$750,000
5.	Powerhouse construction, electrical and instrumentation	Documentation of construction costs	250	\$750,000
6.	Forebay, intake structure and penstock installation	Documentation of construction costs	300	\$900,000
7.	Tailrace and tunnel excavation and reconstruction	Documentation of construction costs	300	\$650,000
8.	Completion of startup, testing and commissioning	Commissioning report and acceptance documentation	400	\$500,000

Total Payments \$5,100,000

Monthly status reports shall be provided by Contractor commencing on 2/1/2006.

In the event acquisition of Project property has not occurred by 10/31/2007, Contractor shall present a detailed report regarding acquisition plan and efforts necessary to achieve acquisition of property and provide an updated draft amendment to Xcel Energy for review.

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/M-17-712

Dated this 22nd day of November 2017

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_17-712_M-17-712
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_17-712_M-17-712
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_17-712_M-17-712
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_17-712_M-17-712
Mara	Ascheman	mara.k.ascheman@xcelenenergy.com	Xcel Energy	414 Nicollet Mall Fl 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-712_M-17-712
Ryan	Barlow	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_17-712_M-17-712
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-712_M-17-712
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-712_M-17-712
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-712_M-17-712
Jeanne	Cochran	Jeanne.Cochran@state.mn.us	Office of Administrative Hearings	P.O. Box 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_17-712_M-17-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_17-712_M-17-712
Corey	Conover	corey.conover@minneapolismn.gov	Minneapolis City Attorney	350 S. Fifth Street City Hall, Room 210 Minneapolis, MN 554022453	Electronic Service	No	OFF_SL_17-712_M-17-712
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-712_M-17-712
Joseph	Dammel	joseph.dammel@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_17-712_M-17-712
Ian	Dobson	Residential.Utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_17-712_M-17-712
Tom	Evers	janette@mplsparksfoundation.org	Minneapolis Parks Foundation	4800 Minnehaha Ave Minneapolis, MN Minnesota 55417	Paper Service	No	OFF_SL_17-712_M-17-712
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_17-712_M-17-712
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17-712_M-17-712
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_17-712_M-17-712
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-712_M-17-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-712_M-17-712
Diane	Hofstede	greatrivercoalition@gmail.com		3359 Central Ave NE Minneapolis, MN 55418	Electronic Service	No	OFF_SL_17-712_M-17-712
Lisa C.	Hondros	N/A	Friends of the Lock and Dam	900 N. Third Street Minneapolis, MN 55401	Paper Service	No	OFF_SL_17-712_M-17-712
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_17-712_M-17-712
Julia	Jazynka	jjazynka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_17-712_M-17-712
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_17-712_M-17-712
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_17-712_M-17-712
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-712_M-17-712
Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-712_M-17-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_17-712_M-17-712
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_17-712_M-17-712
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-712_M-17-712
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_17-712_M-17-712
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_17-712_M-17-712
Paula	Maccabee	Pmaccabee@justchangela.w.com	Just Change Law Offices	1961 Selby Ave Saint Paul, MN 55104	Electronic Service	No	OFF_SL_17-712_M-17-712
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_17-712_M-17-712
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_17-712_M-17-712
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_17-712_M-17-712
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_17-712_M-17-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_17-712_M-17-712
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-712_M-17-712
Alan	Muller	alan@greendel.org	Energy & Environmental Consulting	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_17-712_M-17-712
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_17-712_M-17-712
Katie	Nyberg	knyberg@parkconnection.org	Mississippi Park Connection	111 E. Kellogg Blvd Suite 105 St Paul, MN 55101	Electronic Service	No	OFF_SL_17-712_M-17-712
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_17-712_M-17-712
Jeff	Oxley	jeff.oxley@state.mn.us	Office of Administrative Hearings	600 North Robert Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-712_M-17-712
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_17-712_M-17-712
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-712_M-17-712
Inga	Schuchard	ischuchard@larkinhoffman.com	Larkin Hoffman	8300 Norman Center Drive Suite 1000 Minneapolis, MN 55437	Electronic Service	No	OFF_SL_17-712_M-17-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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