

November 25, 2024

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

**RE: Letter of the Minnesota Department of Commerce
Northern States Power Company's Renewable Energy Standard Rider
Docket No. E002/M-24-353**

Dear Mr. Seuffert:

On October 23, 2024, Northern States Power Company, doing business as Xcel Energy (Xcel) filed a petition in Docket No. E002/M-24-353, requesting the Minnesota Public Utilities Commission (Commission) approve Xcel's 2025 Renewable Energy Standard (RES) Rider revenue requirement of \$64.6 million and the corresponding RES Rider adjustment factor (RES factor) included in the Resource Adjustment line on customer bills.¹ Xcel's proposal would increase the RES factor from 0.981% currently to 2.41% of base revenue, effective January 1, 2025,² which would result in an average monthly bill increase of \$1.24 per month from the current rate.³

Xcel proposes to provisionally implement this RES adjustment factor adjustment by January 1, 2025 if it is not possible for the full RES rider petition to be approved by that time. The January 1, 2025 implementation date for the RES adjustment factor would coincide with the implementation of interim rates in Xcel's multi-year rate case in Docket No. E002/GR-24-320. In its prior two annual RES Rider proceedings, the Commission has approved such provisional implementation of RES adjustment factors.⁴

¹ The resource adjustment also includes adjustments provided for in the Conservation Improvement Program Adjustment Rider, the State Energy Policy Rate Rider, the Renewable Development Fund Rider, the Transmission Cost Recovery Rider, and the Mercury Cost Recovery Rider.

² *In the Matter of the Petition of Northern States Power Company for Approval of the Renewable Energy Standard Rider Revenue Requirements for 2025, and a Revised Adjustment Factor*, Xcel Energy, Petition, October 23, 2024, E002/M-24-343, (eDockets) [202410-211264-02](#), at 2, (hereinafter "2025 RES Rider Petition").

³ 2025 RES Rider Petition, at 18.

⁴ *In the Matter of Northern States Power Company, doing business as Xcel Energy (Xcel), Petition for approval of its 2024 Renewable Energy Standard (RES) Rider Revenue Requirements*, Minnesota Public Utility Commission, Order, December 5, 2023, E002/M-23-454, (eDockets) [202312-200971-01](#); *In the Matter of the Petition of Northern States Power Company for Approval of the Renewable Energy Standard Rider Revenue Requirements For 2023, and a Revised Adjustment Factor*, Minnesota Public Utilities Commission, Order, December 27, 2022, E002/M-22-528, (eDockets) [202212-191643-01](#).

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Having completed an initial review of Xcel's petition, the Department believes a more thorough review and full Commission approval is unlikely by January 1, 2025. The Department therefore recommends the Commission approve Xcel's requested provisional rate increase, resulting in a 2.41% RES factor to be implemented on January 1, 2025.

The Department will file full comments regarding Xcel's petition by February 3, 2025. Any proposed adjustments (relative to the provisional rate) adopted from the Department's full comments will accrue to customers upon the implementation of final RES Rider factor.

Under Minnesota Rules 7829.1050, the Commission may act on uncontested proceedings through its consent calendar if a proceeding presents no disputed or novel issues. This first step in the docket to approve lower provisional rates does not address any novel or disputed issues; therefore, the Department recommends approval through the Commission's consent calendar.

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

Sincerely,

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

AG/ad

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
Letter**

Docket No. E002/M-24-353

Dated this **25th** day of **November 2024**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
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3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	24-353M-24-353
4	Riley	Conlin	riley.conlin@xcelenergy.com	Northern States Power Company dba Xcel Energy-Elec		414 Nicollet Mall, 401 8th Floor Minneapolis MN, 55401 United States	Electronic Service		No	24-353M-24-353
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16	Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis		350 S. 5th Street Room M 301 Minneapolis MN, 55415 United States	Electronic Service		No	24-353M-24-353
17	David	Moeller	dmoeller@allte.com	Minnesota Power			Electronic Service		No	24-353M-24-353
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20	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	24-353M-24-353
21	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-353M-24-353
22	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	24-353M-24-353
23	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	24-353M-24-353
24	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	24-353M-24-353
25	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	24-353M-24-353
26	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	24-353M-24-353

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30	Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine		225 South Sixth Street, Suite 3500 Minneapolis MN, 55402 United States	Electronic Service		No	24-353M-24-353
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