



October 28, 2024

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

**VIA E-FILING**

**Re:**

**In the Matter of Northern States Power Company d/b/a Xcel Energy for Approval of the Transmission Cost Recovery (TCR) Rider Revenue Requirements for 2023 and 2024, Tracker True-Up, and Revised Adjustment Factors**

**MPUC Docket No.  
E-002/M-23-467**

Dear Mr. Seuffert:

The Minnesota Department of Commerce, Division of Energy Resources (“Department”), the Office of the Attorney General, Residential Utilities Division (“OAG”), and the Citizens Utility Board of Minnesota (“CUB,” together, the “Joint Commenters”) submit this revision to Table 2 of their Initial Comments in recognition of the upcoming hearing on the above-referenced matter.

In Reply Comments, Northern States Power Company d/b/a Xcel Energy (“Xcel” or the “Company”) acknowledged that it inadvertently provided unassigned usage data at the operating company level, which included information not only for Minnesota, but also for North Dakota and South Dakota.<sup>1</sup> After adjusting its calculations to isolate Minnesota-jurisdictional values for unassigned usage, the Company recommended lowering the baseline associated with this metric from 89,031,000 kWh to 77,810,000 kWh.<sup>2</sup> The Joint Commenters appreciate the Company’s clarification and seek to update their proposed penalty target based on this revised data.

As captured in our Initial Comments, the Joint Commenters’ originally proposed penalty threshold of 71,224,800 kWh was based on Xcel’s estimate that AMI would reduce assigned

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<sup>1</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy for Approval of the Transmission Cost Recovery (TCR) Rider Revenue Requirements for 2023 and 2024, Tracker True-Up, and Revised Adjustment Factors*, Docket No. E-002/M-23-467, Xcel Energy Reply Comments, Att. A at 22 (Aug. 26, 2024).

<sup>2</sup> *Id.*



usage by 20 percent relative to the baseline by 2026.<sup>3</sup> Applying this same methodology to Xcel's updated baseline proposal produces a new penalty threshold of 62,248,000 kWh. This modification is captured below in a Revised Table 2:

**Revised Table 2. Joint Commenters' Proposed PIMs for Approval – Performance Targets**

		PIM Target						
PIM Category		2024	2025	2026	2027	2028	2029	2030
Unassigned Usage (kWh)	Penalty Threshold	-	-	62,248,000	62,248,000	62,248,000	62,248,000	62,248,000
Meter Failure Rate	Penalty Threshold	-	-	0.5%	0.5%	0.5%	0.5%	0.5%
Load Shifting and Load Reduction (MW)	Penalty Threshold	-	-	76	79	83	86	89
	Reward Threshold	-	-	247	249	250	253	254

Based on these revisions, we offer the following modification to Decision Option 2004:

**Decision Option 2004(a):** Approve the three PIMs as proposed by the Joint Commenters in Table 2 and Table 3 of their initial comments as updated by their letter filed on October 28, 2024.

Sincerely,

/s/ Brandon Crawford

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<sup>3</sup> *In the Matter of Northern States Power Company d/b/a Xcel Energy for Approval of the Transmission Cost Recovery (TCR) Rider Revenue Requirements for 2023 and 2024, Tracker True-Up, and Revised Adjustment Factors, Docket No. E-002/M-23-467, Initial Comments of the Joint Commenters at 15, 26-27 (Jul. 31, 2024).*



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**STATE OF MINNESOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION**

In the Matter of Northern States Power  
Company d/b/a Xcel Energy for Approval of  
the Transmission Cost Recovery (TCR) Rider  
Revenue Requirements for 2023 and 2024,  
Tracker True-Up, and Revised Adjustment  
Factors

MPUC Docket No.  
E-002/M-23-467

**CERTIFICATE OF SERVICE**

I, Brandon Crawford, hereby certify that I have served a true and correct copy of the following documents to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

1. October 28th Letter of the Joint Commenters

Dated this 28th day of October, 2024.

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