

January 4, 2018

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-15-1089 and E002/M-17-828

Dear Mr. Wolf,

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

Xcel Energy's Notice of Receipt of Eighth DOE Settlement Payment.

The filing was made on December 8, 2017 by:

Gail A. Baranko
Manager, Regulatory Project Management
Xcel Energy Services, Inc.
414 Nicollet Mall, 7th Floor
Minneapolis, MN 55401

The Department recommends **approval with modification**, and is available to answer any questions the Minnesota Public Utilities Commission may have in this matter.

Sincerely,

/s/ CHARLES AMEVO
Financial Analyst

CA/lt
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-15-1089 and E002/M-17-828

I. SUMMARY OF THE FILING

On December 8, 2017, Northern States Power Company, doing business as Xcel Energy (Xcel Energy, Xcel, or the Company) filed its compliance filing pursuant to the Minnesota Public Utilities Commission's (Commission) December 16, 2011 Order in Docket No. E002/M-11-807 (Order Point 11) and its December 4, 2012 Order in Docket No. E002/M-11-939 (Order Point 4) addressing the receipt of the eighth United States Department of Energy (DOE) payment (Petition 1 - DOE Refund) covering spent fuel storage damages incurred in 2016. The Company received the eighth payment totaling \$15,180,484.80 on November 13, 2017.

Like the first seven payments and consistent with the Commission's June 3, 2016 Order in Docket No. E002/M-15-1089, the Company deposited the funds into the external interest-bearing account for the administration of the DOE settlement funds. Attachment A of the Company's compliance filing includes a copy of the wire transfer confirming the amount received, redacted to remove Company-sensitive banking information. Attachment B of Xcel Energy's compliance filing shows the Minnesota jurisdictional amount, allocations by customer class, and the estimated credit per customer less bank fees and interest.

On December 8, 2017, the Company also filed a *Notice of Extended DOE Settlement Agreement* (Petition 2 - DOE Settlement Agreement Extension) to update the Commission on its continued claims against the DOE seeking recovery of damages associated with storage of spent nuclear fuel at Xcel's Prairie Island and Monticello nuclear generating plants. In the February 23, 2017 agreement, the Company and the US Government agreed to another extension of the Settlement Agreement to allow for recovery of spent fuel storage damages through December 31, 2019 (payments 9-11).

II. BACKGROUND INFORMATION

In Attachment A of its Petition 2 – DOE Settlement Agreement Extension, Xcel Energy¹ provided background regarding the DOE settlement payments, up to and including the most recent extension of the Settlement Agreement to allow recovery through December 31, 2019. The Minnesota Department of Commerce, Division of Energy Resources (Department) draws from the Company's filing in providing the background information for these comments.

A. *PETITION 2 - DOE SETTLEMENT AGREEMENT EXTENSION*

In Attachment A of Petition 2, the Company stated that in 1998 it filed the first of two suits against the United States DOE seeking to recover damages associated with the storage of spent nuclear fuel at Xcel's Prairie Island and Monticello nuclear generating plants. The first lawsuit sought damages through 2004 for partial breach of the Standard Contract for Disposal of spent nuclear fuel for failing to take title to, transport, and dispose of spent nuclear fuel beginning no later than January 31, 1998. The second lawsuit sought damages from 2005 through 2008.

Xcel Energy reached a settlement agreement with DOE on July 7, 2011 (Settlement Agreement). The Settlement Agreement provided a mechanism for the Company to recover its spent nuclear fuel storage damages through December 31, 2013 (Payments 1-5). On January 24, 2014, the parties extended the Settlement Agreement for recovery of the spent fuel storage damages through December 31, 2016 (Payment 6-8). On February 23, 2017 another extension of the Settlement Agreement was agreed to, to allow for recovery through December 31, 2019 (payments 9-11).

B. *PETITION I – DOE REFUND*

Past DOE payments have been used to offset higher nuclear decommissioning costs due to DOE not taking title to, transporting, and disposing of nuclear spent fuel. As detailed below, some DOE payments have been used as credits to offset higher decommissioning accruals (payments 3 to 5), but most of the DOE payments have been returned to customers as direct bill credits as directed by various Commission Orders.

Initially, for DOE payments 1 and 2, the Commission directed the Settlement Agreement payments to be returned to customers through a direct bill credit.² For payments 3 and 4, the Commission directed that the payments be deposited to the nuclear decommissioning accrual fund and that the excess of payment 4 over the 2014 decommissioning accrual amount be deposited into an external account separate from the decommissioning fund.³ On May 8, 2015 in the order approving the Company's 2014 rate case (Docket No. E002/GR-13-868) the

¹ See Attachment A in Docket No. E002/M-15-1089 and E002/M-17-828 compliance filing of 12/8/2017.

² See the Commission's December 16, 2011 Order in Docket No. E002/M-11-807.

³ See the Commission's December 4, 2012 Order in Docket Nos. E002/M-11-807 and E002/M-11-939.

Commission again directed that payments 4 and 5 be combined and any amounts that exceeded the 2014 and 2015 nuclear decommissioning accruals were to be utilized as a rate moderation tool to reduce the 2015-Step (second year of the multi-year rate case) revenue deficiency. In docket No. E002/M-15-1089 the Commission, in its order approving Xcel's proposed refund plans, directed that payments 6 and 7 be returned to customers through a direct bill credit.

III. DEPARTMENT ANALYSIS

Minnesota Rules do not identify procedures for the specific circumstances of this proceeding, but the following Minnesota Rules pertain to similar circumstances. The Minnesota Rules quoted below address refunds and related interest rates for both interim rate refunds and purchased gas adjustment (PGA) refunds, respectively. Although these Minnesota Rules do not specifically address refunds of DOE refunds for nuclear plant-related capital, operation and maintenance (O&M) and property tax costs, both provide guidance on refunding processes and interest rates.

A. MINNESOTA RULE REQUIREMENTS

**Minnesota Rule 7825.3300:
METHODS AND PROCEDURES FOR REFUNDING.**

In the event that a hearing is ordered by the commission as a result of a change in rates and proposed rates are suspended, the commission shall allow the utility to place suspended rates into effect as to services to be rendered on or subsequent to the effective date of the change in rates, subject to refund of the increase in rates or part thereof determined to be unreasonable by the commission provided that the payment of refunds is insured under either of the following methods: file with the commission a bond, signed by an authorized official of the utility, in an amount and with sureties approved by the commission; or file with the commission an unqualified agreement, signed by an authorized official of the utility, to refund any portion of the increase in rates determined to be unreasonable together with interest thereon.

Any increase in rates or part thereof determined by the commission to be unreasonable shall be refunded to customers or credited to customers' accounts within 90 days from the effective date of the commission order and determined in a manner prescribed by the commission including interest at the average prime interest rate computed from the effective date of the proposed rates through the date of refund or credit.

**Minnesota Rule 7825.2700:
PURCHASE GAS CHARGES, AUTOMATIC ADJUSTMENT.**

Subp. 8. Refunds.

Refunds and interest on the refunds, that are received from the suppliers or transporters of purchased gas and attributable to the cost of gas previously sold, must be annually refunded by credits to bills, except that cumulative refund amounts equal to or greater than \$5 per customer must be refunded within 90 days from the date the refund is received from a supplier or transporter. Refunds must be allocated to customer classes in proportion to previously charged costs of purchased gas. Within classes, the refund amount per unit must be applied to bills on the basis of individual 12-month usage. The utility shall add interest to the un-refunded balance at the prime interest rate.

B. NOVEMBER 2017 DOE PAYMENT FOR 2016 DAMAGES AND CONFIRMING REFUND AMOUNT

The eighth payment under the DOE Settlement representing damages for costs incurred in 2016 was received by Xcel Energy in the amount of \$15,180,484.80 on a total-Company basis. The Company included in their compliance filing, Petition I – DOE Refund on Attachment A, a copy of the wire transfer document showing the \$15,180,484.80 deposited into the Company’s segregated bank account titled “NSPMN Fuel Storage SE” to allow confirmation of the DOE payment amount.

The Company also provided in Attachment B of their compliance filing (Petition I – DOE Refund) the 2016 allocators for the 36-month coincident peak (CP) to allocate the DOE payment between Northern States Power Company – Minnesota (NSPM) (Minnesota Jurisdiction) and Northern States Power Company – Wisconsin (NSPW) (Wisconsin Jurisdiction). Xcel also provided the 12-month coincident peak allocator to allocate the DOE payment allocable to NSPM between Minnesota, North Dakota, and South Dakota.

The Department reviewed the Minnesota jurisdictional allocation process used by the Company to apportion 73.8220 percent of the DOE eighth payment to Minnesota. The eighth total payment is first allocated between the Minnesota jurisdiction including Minnesota, North Dakota and South Dakota; and the Wisconsin jurisdiction including Wisconsin and Michigan using the 2016 36-month coincident peak ratio (2016 CP ratio).⁴ As a result, the Minnesota jurisdiction was assigned 0.841349 of 2016 CP ratio and the Wisconsin jurisdiction was attributed 0.158651 of 2016 CP ratio.⁵ Then NSPM’s amount is allocated among Minnesota (0.877424), North Dakota (0.061708) and South Dakota (0.060868) based on the 12-month

⁴ Use of 2016 allocators is appropriate since the DOE payment covers spent fuel storage damages incurred in 2016.

⁵ Appendix A page 1, Northern States Power Companies Interchange Agreement – Comparison of Costs – Present and Proposed Rate Schedule, Docket No. PR-16-232.

coincident peak allocator. As a result, \$11,206,535, or 73.8220 percent, of the \$15,180,484.80 total DOE payment is allocated to Minnesota ratepayers as described above and as shown on the Company's Attachment B, Petition I.

Consistent with the prior DOE refunds, the Department recommends that the Commission require the eighth payment, including all accumulated interest, to be refunded to customers, and allow the Company to exclude related bank fees or charges specific to these funds. The Department also recommends the Company be required to make refunds within 60 days of the Commission's order.

The Company proposed to hold the eighth payment of \$15,180,485 in an interest-bearing account until its 2019 Integrated Resource Plan is resolved and the Commission can decide at that time whether to add the funds to the Nuclear Decommissioning Trust Fund (NDT) or refund them directly to customers. The Department notes that the Commission approved an annual accrual of \$14,030,831 for decommissioning under the 60-year scenario and a \$2,020,602 accrual end-of-life nuclear fuel starting January 1, 2016 for the calendar years 2016 through 2018.⁶ Additionally, the Company in its most recently filed decommissioning study in the instant docket filed on December 1, 2018, requests that a new decommissioning accrual not be established until 2019 and possibly as late as 2021. Therefore, the Department concludes that it is not reasonable to delay returning to customers the DOE refund related to 2016 since the Commission's current decommission Order does not support a higher decommissioning accrual amount (and the currently approved decommissioning accrual is already built into base rates).

Further, and on a procedural note, the Department will not be reviewing Xcel's new decommissioning study until the spring of 2018 due to extensive workload and resource constraints (initial comments are due June 1, 2018). It would not be reasonable to delay the DOE refund to customers due to the Department's resource constraints. Finally, as noted in the background section above, in most of the past Commission Orders the Commission directed DOE payments to be refunded to customers through a direct bill credit. A refund delay would increase the mismatch between the ratepayers impacted by the 2016 damages and those who receive refunds. For all these reasons, the Department supports a direct bill credit refund of the eighth DOE payment.

C. SETTLEMENT AGREEMENT EXTENSION

As previously noted, Northern States Power Company and the U.S. Government agreed to extend the Settlement Agreement to allow for the recovery of spent fuel storage damages through December 31, 2019. Payment 9 is expected to be received in late 2018 for damages in 2017, and subsequent payments will be received following a similar schedule. The Department appreciates the Settlement Agreement extension update from the Company and recommends

⁶ See Order Point 2 of the Commission's October 5, 2015 Order in Docket E002/M-14-761.

that decisions on how to apply those future payments can be made as the payments are received.

IV. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

Based on our review, the Department was able to confirm the DOE eighth payment of \$15,180,485 for costs incurred in 2016, and tie out allocators used in determining the Minnesota jurisdictional refund amount of \$11,206,535.

The Department recommends that the Commission:

1. Approve the one-time bill credit method for refunding the \$11,206,535 to Minnesota customers, including all interest accumulated net of related bank fees;
2. Require the Company to provide refunds within 60 days of the Commission's order;
3. Require the Company to provide a compliance filing within 30 days after completing the bill credits; and
4. Require the Company to continue to file information and documentation consistent with the Commission's Order Point 11 in Docket No. E002/M-11-807 within 30 days of receiving future DOE payments pursuant to the Extended Settlement Agreement.

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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-15-1089 and E002/M-17-828

Dated this 4th day of January 2018

/s/Sharon Ferguson

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