

October 2, 2015

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/GR-13-868

Dear Mr. Wolf:

Attached are the *Comments* of the Minnesota Department of Commerce, Division of Energy Resources (the Department or DOC) in the following matter:

*A Compliance Filing* submitted by Northern States Power Company d/b/a Xcel Energy (Xcel or the Company), pursuant to the Minnesota Public Utilities Commission's (Commission) May 8, 2015 *Findings of Fact, Conclusions of Law, and Order*, the July 13, 2015 *Order Denying Petitions for Reconsideration*, and the August 31, 2015 *Order Reopening, Clarifying, and Supplementing May 8, 2015 Order*.

The *Compliance Filing* was submitted on September 2, 2015 by:

Gail A. Baranko  
Manager, Regulatory Project Management  
Xcel Energy  
414 Nicollet Mall  
Minneapolis, Minnesota 55401-1993

The Department reviewed the Company's compliances, and recommends approval with additional reporting requirements, and is available to answer any questions that the Commission may have.

Sincerely,

/s/ DALE V. LUSTI  
Financial Analyst  
651-539-1829

DVL/lt  
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES

DOCKET No. E002/GR-13-868

I. INTRODUCTION

On May 8, 2015, the Minnesota Public Utilities Commission (Commission) issued its *Findings of Fact, Conclusions, and Order (May 8 Order)*; concerning the request by Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) to increase electric rates in Minnesota in the above-referenced docket. Ordering Paragraph No. 53 of the Commission's *May 8 Order* required Xcel to submit certain information, as discussed below. The Company's compliance filings concerning Ordering Paragraph No. 53 were due within 30 days of the *August 31 Order*, or by September 30, 2015.

On August 31, 2015, the Commission issued its *Order Reopening, Clarifying, and Supplementing May 8, 2015 Order (August 31 Order)*.

On September 2, 2015, Xcel submitted its *Compliance Filing* in accordance with Ordering Paragraph 53 of the *May 8 Order* and Ordering Paragraph Nos. 14, 16, 17 and 18 of the *August 31 Order*.

On September 21, 2015, the Anti-Trust and Utilities Division of the Office of Attorney General (AUD-OAG) filed a request for reconsideration of the Commission's August 31 Order. The AUD-OAG request will have no impact on the implementation of final rates, but will impact the interim rate refund if approved.

The Department reviewed Xcel's *Compliance Filings*. Pursuant to Ordering Paragraph No. 53 of the *May 8 Order* and Ordering Paragraph Nos. 14, 16, 17 and 18 of the *August 31 Order*, the DOC submits these *Comments* that address each compliance item.

## II. THE DOC'S ANALYSIS OF THE COMPLIANCE FILING BY ORDERING PARAGRAPH

Ordering Paragraph No. 1 of the Commission's *May 8 Order* states that Xcel's Electric Utility is entitled to increase Minnesota jurisdictional revenues by \$58,908,000 to produce jurisdictional total retail related revenue of \$2,885,909,000 for the test year ending December 31, 2014, and to produce jurisdictional retail related revenue of \$2,992,385,000 for the 2015 Step.

Ordering Paragraph 40 (D) of the Commission's *May 8 Order* states that Xcel shall file a plan implementing an education and outreach program for its customers explaining the goals and operations of its revenue decoupling mechanism (RDM) program.

Ordering Paragraph 7 of the Commission's *August 31 Order* requires Xcel to set the baseline fixed revenue per customer and baseline fixed energy charges using the authorized revenues from whatever rates are in place, be that final rates from this rate case (if Xcel decides not to file another rate case) or final rates from a future rate case (if Xcel files a rate case in 2015).

Ordering Paragraph No. 53 of the Commission's *May 8 Order* requires that the Company include the following items in its *Compliance Filing*:

- A. Revised schedules of rates and charges reflecting the revenue requirement and the rate design decisions herein, along with the proposed effective date, and including the following information:
  1. Breakdown of Total Operating Revenues by type;
  2. Schedules showing all billing determinants for the retail sales (and sale for resale) of electricity. These schedules shall include but not be limited to:
    - a. Total revenue by customer class;
    - b. Total number of customers, the customer charge and total customer charge revenue by customer class; and
    - c. For each customer class, the total number of energy and demand related billing units, the per unit energy and demand cost of energy, and the total energy and demand related sales revenues.
  3. Revised tariff sheets incorporating authorized rate design decisions;

4. Proposed customer notices explaining the final rates, the monthly basic service charge, and any and all changes to rate design and customer billing.
- B. A revised base cost of energy, supporting schedules, and revised fuel adjustment tariffs to be in effect on the date final rates are implemented.
  - C. A summary listing of all other rate riders and charges in effect, and continuing, after the date final rates are implemented.
  - D. A computation of the Conservation Cost Recovery (CCRC) based upon the decisions made herein for inclusion in the final order. The filing shall include a schedule detailing the CIP tracker balance at the beginning of interim rates, the revenues (CCRC and CIP Adjustment Factor) and costs recorded during the period of interim rates, and the CIP tracker balance at the time final rates become effective.

Ordering Paragraph No. 14 of the Commission's *August 31 Order* requires that the Company in its *Compliance Filing* provide estimated rate and bill impacts for customer classes.

Ordering Paragraph No. 16 of the Commission's *August 31 Order* requires that the Company in its *Compliance Filing* net its test-year interim rate revenue refund obligation against step-year interim rate revenue under-collections for the period from March 3 through the date final rates take effect.

Ordering Paragraph No. 17 of the Commission's *August 31 Order* requires that the Company in its *Compliance Filing* not (a) net its test-year interim rate revenue refund obligation against its step-year interim rate revenue under-collections through March 3, 2015, nor (b) reduce the amount of interest paid on excess interim rates collected in 2014 by offsetting the average balance of excess interim rates collected using under-collections in 2015.

Ordering Paragraph No. 18 of the Commission's *August 31 Order* requires that the interest rate to be paid on a possible interim rate refund to be the prime interest rate, or 3.25%.

Each of these items is discussed below.

A. *ORDERING PARAGRAPH NO. 1*

Ordering Paragraph No. 1 of the Commission's *May 8 Order* states that "Xcel's Electric Utility is entitled to increase Minnesota jurisdictional revenues by \$58,908,000 to produce jurisdictional total retail related revenue of \$2,885,909,000 for the test year ending December 31, 2014 and to produce jurisdictional total retail-related revenue of \$2,992,385,000 for the 2015 Step."

Page 14 of the Commission's *August 31 Order* states "The above Commission findings and conclusions result in a total gross revenue deficiency of \$55,511,000 for the 2014 test year and \$93,908,000 for the 2015 Step..."

DOC's review of the Company's Schedule 1 confirms that the *Compliance Filing* incorporates these authorized amounts.

**B. ORDERING PARAGRAPH NO. 53(A), SUBPART 1**

Ordering Paragraph No. 53(A), Subpart (1), requires the Company to provide a breakdown of Total Operating Revenues by type.

The DOC reviewed Schedule 2 of Xcel's *Compliance Filing*, and notes that the schedule complies with the Commission's Order.

**C. ORDERING PARAGRAPH NO. 53(A), SUBPART 2**

Ordering Paragraph No. 53(A), Subpart (2), requires the Company to provide "[s]chedules showing all billing determinants for the retail sales (and sale for resale) of electricity." The DOC confirms that the Company's *Compliance Filing* includes Schedule 3A in response to Ordering Paragraph No. 53(A), Subpart (2).

Paragraph 14 of the Commission's *August 31 Order* states "Xcel shall provide estimated rate and bill impacts for customer classes in its thirty-day compliance filing." The DOC confirms that the Company's *Compliance Filing* includes Schedules 3B and 3C in response to Paragraph 14 of the Commission's *August 31 Order*.

The DOC reviewed Schedules 3A, 3B and 3C of Xcel's *Compliance Filing*, and notes that the schedules comply with the Commission's Order.

**D. ORDERING PARAGRAPH NO. 53(A), SUBPART 3**

Ordering Paragraph No. 53(A), Subpart (3), requires the Company to provide revised tariff sheets incorporating authorized rate design decisions.

The DOC reviewed Schedule 4 of Xcel's *Compliance Filing*, and notes that it complies with the Commission's Order.

**E. ORDERING PARAGRAPH NO. 53(A), SUBPART 4**

Schedule 5 of the *Compliance Filing* responds to Ordering Paragraph No. 53(A), Subpart 4 to submit proposed customer notices explaining the final rates, the monthly basic service charge, and any and all changes to rate design and customer billing.

The DOC reviewed Schedule 5 of Xcel's *Compliance Filing*, and notes that it complies with the Commission's Order.

F. ORDERING PARAGRAPH NO. 53(B)

Ordering Paragraph No. 53(B) states that Xcel Energy shall submit “a revised base cost of energy, supporting schedules, and revised fuel adjustment tariffs to be in effect on the date final rates are implemented.”

The DOC reviewed Xcel’s compliance filing regarding the revised Fuel Clause Rider and the Base Cost of Fuel as provided under Schedule 6 and Schedule 4C (Section No. 5, 24<sup>th</sup> Revised Sheet No. 91, 13<sup>th</sup> Revised Sheet No. 91.1 and 8<sup>th</sup> Revised Sheet No. 91.2). The DOC concludes that the compliance filing meets the requirements of Ordering Paragraph 53(B).

G. ORDERING PARAGRAPH NO. 53(C)

Schedule 7 of the *Compliance Filing* responds to Ordering Paragraph No. 53(C) of the Commission’s *Order* that requires Xcel Energy to provide a “summary listing of all other rate riders and charges in effect, and continuing, after the date that final rates are implemented.”

The DOC reviewed Schedule 7 of Xcel’s *Compliance Filing*, and notes that it complies with the Commission’s *Order*.

H. ORDERING PARAGRAPH NOS. 53(D)

Schedule 8 of the *Compliance Filing* responds to Ordering Paragraph Nos. 53(D) of the Commission’s *Order*.

Paragraph No. 53(D) requires Xcel Energy to provide “[a] computation of the conservation cost recovery charge (CCRC) based herein for inclusion in final order.” Schedule 8, Attachment A provides the calculation of the new CCRC rate which will be \$0.003130 per kWh, effective November 1, 2015.

Paragraph No. 53(D) also requires Xcel Energy to “provide a schedule detailing the CIP tracker balance at the beginning of interim rates, the revenues (CCRC and CIP adjustment factor) and costs recorded during the period of interim rates, and the CIP tracker balance at the time final rates become effective.” The Company reported in Schedule 8, Attachment B, that the CIP tracker balance on January 3, 2014 was \$30,624,948. The Company’s test year CCRC through the interim rate period of January 3, 2014 and June 30, 2015 and forecasted Tracker activity ending November 30, 2013 was \$0.003051 per kWh, which is estimated to generate \$161,825,156. The CIP recovery rider is estimated to generate \$100,458,537; for a total estimated recovery of \$262,283,693. The Company also reported that costs for the same period totaled \$156,716,126 which included DSM expenditures of \$157,996,174 and carrying charges of (\$1,279,048). The forecasted CIP tracker balance on October 31, 2015 is \$7,894,174.

Based on its review, the DOC recommends that the Commission approve Xcel Energy's compliance filing related to CIP and the CCRC. However, the DOC also recommends that the Commission require Xcel Energy to resubmit the CIP tracker account (including rates, revenues, expenses, and ending balance) for the entire period that interim rates were in effect within 10 days after final rates become effective.

*I. ORDERING PARAGRAPH NOS. 16, 17 AND 18 OF THE AUGUST 31 ORDER*

The Company's Schedule 9 includes a plan to refund the difference in rates authorized by the Commission's *August 31 Order* (a final rate increase of \$55,511,000 for the 2014 test year, and \$149,420,000 for the 2015 test year) and those placed into effect on an interim basis on January 2, 2014 (an interim increase of \$127,407,000). The Company calculated the interim rate refund without interest to be \$53,671,978. Pursuant to Ordering Paragraph 18 of the Commission's *August 31 Order*, the Company calculated interest at the prime interest rate, or 3.25%, resulting in \$2,975,649 of interest through October 31, 2015.

Under Xcel's refund proposal, the Company would apply an approximate 24.6035 percent refund rate to the interim rates actually billed. As identified in Schedule 9 of its Compliance Filing, the Company estimates that the average residential customer will receive a refund of \$19.79 under its proposal.

Xcel Energy proposed that beginning no later than November 23, 2015:

- Refunds to customers currently receiving service from Xcel Energy would appear as a bill credit;
- Refunds to customers who have left the system would be paid by check, provided that the refund is greater than \$2.00; and
- Unrefunded monies would be handled in accordance with Minn. Stat. §345.34.

The November 23, 2015 refund implementation date is in compliance with Minn. Stat. §216B.16, subd. 3, which requires that "...The utility shall commence distribution of the refund to its customers within 120 days of the final order..."

The DOC recommends that the Commission approve Xcel Energy's Interim Rate Refund Plan and require Xcel Energy to submit, within 10 days of the refund, a compliance filing that shows the actual refunds and interest paid by class including the calculations.

*J. ORDERING PARAGRAPH NO. 40(D) OF THE MAY 8 ORDER AND ORDERING PARAGRAPH NO. 7 OF THE AUGUST 31 ORDER*

The Commission's May 8 Ordering Paragraph 40 (D) states that Xcel shall file a plan implementing an education and outreach program for its customers explaining the goals and operations of its RDM program. The Company's Schedule 10 indicates that it will file a customer education and outreach program implementation plan for decoupling within 60 days of its September 2, 2015 filing.

The Commission's August 31 Ordering Paragraph 7 states that Xcel shall set the baseline fixed revenue per customer and baseline fixed energy charges using the authorized revenues from whatever rates are in place, be that final rates from this rate case (if Xcel decides not to file another rate case) or final rates from a future rate case (if Xcel files a rate case in 2015). The Company's provides in Schedule 10, Attachment A, the revenue decoupling model monthly baseline Fixed Revenue per Customer and baseline Fixed Energy Charges by class based on authorized revenues in this proceeding. The Company further states that if the Company files a rate case during the pilot program, the data (as filed in this Compliance Filing Schedule 10) will be updated to include final authorized revenues in the future case.

The Company also notes that the Revenue Decoupling mechanism Rider red-line and final tariff pages can be found in its Compliance Filing as part of Schedule 4: See Tariff Sheets Nos. 5-117 and 5-118.

The DOC recommends that the Commission approve Xcel Energy's Revenue Decoupling Compliance filing in this proceeding.

### **III. SUMMARY OF THE DOC RECOMMENDATIONS**

In conclusion, the DOC recommends that the Commission approve Xcel Energy's compliance filing with the following additional compliance requirements:

- 1) require Xcel Energy to resubmit the CIP tracker account (including rates, revenues, expenses, and ending balance) for the entire period that interim rates were in effect within 10 days after final rates become effective; and
- 2) require Xcel Energy to file within 10 days of the interim rate refund, a compliance filing report that shows the actual refunds and interest paid by class including the calculations.



**CERTIFICATE OF SERVICE**

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, 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 Nos. **E002/GR-13-868**

Dated this **2nd** day of **October, 2015**.

/s/Linda Chavez

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