



414 Nicollet Mall
Minneapolis, Minnesota 55401

— VIA ELECTRONIC FILING —

March 8, 2021

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

RE: REPLY COMMENTS
PETITION FOR APPROVAL OF A CREDIT MECHANISM TO RETURN TO
CUSTOMERS DEPARTMENT OF ENERGY SETTLEMENT PAYMENTS.
DOCKET NO. E002/M-21-69

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments.

We appreciate the review of our filing by the Minnesota Department of Commerce, Division of Energy Resources (Department) and Energy Cents Coalition (ECC) for their recommendation in their February 26, 2021 comments.

The Department requested the Company provide additional information regarding support for the planned implementation timing for the customer bill credit and on negotiations for a third extension of the Department of Energy settlement.

Credit Implementation Timing

The Company's billing system has limitations due to various refunds and other billing credits already scheduled to occur in 2021 in various NSP state jurisdictions, and the limitation of the Company's billing system to process only one refund at a time¹, the Company will not be able to implement the 11th DOE credit within 60 days of an Order. This involves calculating a credit for every MN customer based on their most recent 12 months of usage – in total the setup, testing and posting to accounts involves approximately eight weeks.

Current customer credits and refunds in our queue include a MN gas incentive compensation refund, which we committed to complete no later than second quarter, the Quality of Service Tariff customer credit ordered by the Commission

¹ The billing system limitation applies to refunds/credits based upon 12 months of historical usage.

in January and a North Dakota electric interim rate refund. With the current queue of refunds and credits, we estimated the earliest the 11th DOE refund implementation could begin as a one-time bill credit is in the third or fourth quarter of 2021. However, we will work to implement this credit as soon as possible once the above noted credits / refunds have been implemented.

Department of Energy Settlement Negotiations

The Company and the U.S. Government reached an agreement in August of 2020, to extend the 2011 Settlement Agreement for the recovery of spent fuel storage damages for another three-year period to allow for recovery of damages through December 31, 2022 (Payments 12, 13, 14). The Company is currently gathering documentation to support the Company's 2020 spent nuclear fuel claim.

Future Compliance

The Company agrees with the Department recommendations to submit a compliance filing 30 days after completion of the bill credits and to continue providing the information and documentation consistent with the Commission's Order in Docket No. E002/M-11-807².

Energy CENTS Coalition (ECC)

In its Comments, ECC recommended the residential customer class allocation of approximately \$2.9 million be used to supplement the Company's POWER On program in lieu of providing individual residential customer credits. The Company would be agreeable to this proposal. We note the Commission approved a \$2 million allocation to the POWER On program in Docket No. E002/M-11-807³ from the original multi-year settlement payment received from the Department of Energy for damages incurred through 1998 to 2008.

Pursuant to Minn. Stat. § 216B.17, Xcel Energy has electronically filed these documents with the Minnesota Public Utilities Commission. If you have any questions or concerns regarding this matter please contact Gail Baranko at (612) 330-6935 or gail.baranko@xcelenergy.com or Carl Cronin at (612) 215-4669 or carl.cronin@xcelenergy.com.

Sincerely,

/s/

GAIL A. BARANKO
MANAGER, REGULATORY PROJECTS

Enclosures
cc: Service Lists

² Order Point 11, December 16, 2011 Order, Docket No. E002/M-11-807.

³ IBID Order Point 5.

CERTIFICATE OF SERVICE

I, Mustafa Adams, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

xx electronic filing

XCEL ENERGY SERVICE LIST E002/M-21-69

Dated this 8th day of March 2021

/s/

Mustafa Adams
Regulatory Administrator

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