

December 23, 2021

Will Seuffert
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 Nos. E002/M-21-815 and E002/M-15-1089

Dear Mr. Seuffert:

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

Xcel Energy's Petition for Approval of a Credit Mechanism to Return Customers
Department of Energy Settlement Payments.

The Petition was filed on November 24, 2021 by:

Gail A. Baranko
Regulatory Manager
Xcel Energy Services, Inc.
414 Nicollet Mall, 401-7
Minneapolis, MN 55401

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve the petition**. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Holly Soderbeck
Financial Analyst

HCS/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. E002/M-21-815 and E002/M-15-1089

I. BACKGROUND INFORMATION

Under the Nuclear Waste Policy Act, the United States Department of Energy (DOE) committed to transport and dispose of spent nuclear fuel beginning no later than January 1998. In exchange, utilities were required to contribute 1 mill (\$0.001) for every kilowatt-hour of electricity generated by their nuclear power plants. As of November 24, 2021, the DOE has not accepted any spent nuclear fuel.

In 1998, the Northern States Power Company, doing business as Xcel Energy (Xcel or the Company), filed the first of its lawsuits against the DOE seeking damages for partial breach of contract. The Company reached a settlement with the U.S. Government in July 2011, awarding Xcel damages for 2009 through 2013. In January 2014, the parties agreed to extend damage payments through 2016. In February 2017, the parties agreed to extend the settlement through 2019. In August 2020, the parties agreed to extend the settlement through 2022.

II. SUMMARY OF THE FILING

On November 24, 2021, Xcel submitted 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) addressing the receipt of the twelfth DOE payment covering spent fuel storage damages incurred in 2020. The Company received \$16,550,164 on October 26, 2021 of which \$12,118,943 is applicable to Xcel's Minnesota Jurisdiction.

In compliance with the Commission's June 3, 2016 Order in Docket No. E002/M-15-1089, the Company deposited the funds into a separate external interest-bearing account. Attachment A of Xcel's filing is evidence of the wire transfer, redacted to remove Company-sensitive banking information, confirming the amount received. Attachment B of Xcel's filing shows the jurisdictional calculations, allocations by customer class, and the estimated credit per customer. Attachment C is a summary of the twelve payments from DOE, including the damage period, the payment dates, and Minnesota jurisdictional amounts.

Xcel is seeking approval to combine the twelfth DOE customer credit with the combined credit to Minnesota electric customers associated with the 2020 property tax and annual incentive compensation refunds, currently awaiting a Commission decision in Docket No. E002/M-19-688 (the "2020 True-Up docket"). Attachment D includes a copy of a schedule provided in the Company's August 10, 2021 Reply Comments in the True-Up Docket that includes the DOE payment and estimated average refund per customer class.

The Company stated that, if the Commission approves the Company's proposal to combine the DOE payment with the 2020 True-Up refund, the Company would, "begin implementation of the one-time bill credit, including a bill message, based on the customer's 2020 usage in the second quarter or early third quarter of 2022."¹ Additionally, as with previous DOE payments, Xcel proposed to file a compliance filing within 30 days after the completion of the bill credit, and any future payments, providing a summary of the settlement payment, interest credited, class allocations and the actual average customer credit per customer class.²

The petition also included financial information as required by the Commission's May 12, 2021 Order in Docket No. E002/M-21-69 (Order Point 3). The Order requires the Company to provide a thorough discussion of the process it used to determine the financial institution and arrangements it selected for the short-term deposit. At a minimum, Xcel must document that it sought proposals from at least three financial institutions capable of managing these types of short-term deposits and provide a thorough explanation of why it chose the financial institution it chose.

III. DEPARTMENT ANALYSIS

A. CONFIRMING 2020 REFUND AMOUNT

The twelfth payment under the DOE Settlement, representing damages for costs incurred in 2020, was received by Xcel in the amount of \$16,550,164 on a Total Company basis. In Attachment A of its compliance filing, the Company included a copy of the wire transfer receipt showing the full amount deposited into Xcel's account.

Attachment B of Xcel's filing provided the 2020 allocators for the 36-month coincident peak to allocate the DOE payment between Northern States Power Company – Minnesota (NSPM) and Northern States Power Company – Wisconsin (NSPW) and the 12-month coincident peak allocator to allocate NSPM's share of the DOE payment between Minnesota, North Dakota, and South Dakota. The Department tied the NSPM/NSPW interchange allocator of 0.838543 to the 2020 Interchange Agreement in Docket No. E002/PR-20-363 in Appendix A, page 1, and the state jurisdictional allocator of 0.873247 to Xcel's 2020 Annual Report, tab E16 in Docket No. E, G999/PR-21-4. Using the DOE payment of \$16,550,164 multiplied by the allocators (resulting in an overall allocator of 0.732255) results in \$12,118,943 allocated to the Minnesota Jurisdiction as shown on the Company's Attachment B.

Attachment B of Xcel's filing also provided stratification components, weighting the capacity component at 19.30 percent and the energy component at 80.70 percent as reported in Docket No. E002/GR-15-826. The Department tied these weightings to the Commission's Staff Briefing Papers, Volume IV as reported in Docket No. E002/GR-15-826.³

¹ Petition, page 6.

² *Id.*

³ The Commission's June 12, 2017 Findings of Fact, Conclusions, and Order in Docket no. E200/GR-15-826, states, "the Commission will continue its reliance on the Stratification Method" (p. 40).

B. DOE REFUND IMPLEMENTATION

Consistent with the prior DOE refunds, Xcel placed the funds from the refund into a separate interest-bearing account and proposed to include the actual amount of interest earned, net of bank fees, in the credit to ratepayers. Xcel is seeking approval to combine this refund with the combined credit to Minnesota electric customers associated with the 2020 property tax and annual incentive compensation refunds, currently awaiting a Commission decision in Docket No. E002/M-19-688 (the “2020 True-Up docket”).

Also consistent with prior DOE funds, the Company proposed the following bill message regarding the refund,⁴

Your bill this month includes a refund due to lower actual property tax owned by Xcel Energy and lower employee incentive compensation for 2020 and a settlement regarding nuclear fuel storage per the MN Public Utilities Commission. Your refund appears on your bill as “Elec Combined Refund CR”.

Finally, if the bill credit proposed in the instant docket is approved by the Commission, Xcel proposed to initiate one-time bill credits in the second quarter or early third quarter of 2022. Typically, the Department recommends that refunds be credited to ratepayers within 60 days of the Commission Order. The Department requests that Xcel discuss in reply comments why the refund of this DOE payment would be delayed until the second half of 2022.

C. FINANCIAL INSTITUTIONS

The Commission’s May 12, 2021 Order in Docket No. E002/M-21-69 (Order Point 3) required the Company to provide discussion of the process used to determine the financial institution for the short-term deposit, including proposals from at least three financial institutions.

The petition notes that the institution Xcel has historically used for these short-term deposits offered to increase the yield on the account from 0.02 percent to 0.05 percent. Xcel stated that it uses the same institution for other banking services, and that the institution agreed to apply the yield increase on sweeps on all of the Company’s accounts. The second institution offered a yield ranging from 0.005 percent to 0.01299 percent with minimal service costs. The third institution committed to a yield of 0.08 percent and further agreed to waive all transaction, maintenance, and implementation fees.

The Company stated in its petition, “Based on our experience and familiarity with the three financial institutions listed, we believe it is in the best interest of the Company, our customers, and our stakeholders to continue to keep the DOE funds with Xcel’s current institution for a variety of reasons.”⁵ Reasons included familiarity, competitive yield, existing operating process, and relationships

⁴ Petition, page 5.

⁵ Petition, page 7.

with the institutions that create efficiencies. Additionally, the financial institution will offer the additional interest on all the Company's sweep accounts. The Company stated that the additional interest it will earn on all of its sweep accounts will more than offset the price differential between the financial institutions.

Given the existing operating efficiencies and the small differences in yields, the Department concludes that it is reasonable for Xcel to continue to keep the DOE funds with its current institution.

D. CONTINUATION OF SETTLEMENT PAYMENTS

The currently reported twelfth payment is the first of three payments included in the third extension of the Settlement Agreement with the DOE. It is unclear to the Department if the third extension of the Settlement Agreement is similar to the original Settlement Agreement. The Department requests that that Xcel provide a copy of the Settlement Agreement and the third extension of the Settlement Agreement and explain any changes in their reply comments. The Department also requests that if there are any changes, Xcel provide support for why those changes are appropriate.

IV. CONCLUSIONS AND RECOMMENDATIONS

Based on the above discussion, the Department recommends that the Commission:

- Approve the one-time bill credit method for refunding \$12,118,943 to the Minnesota Jurisdiction, including all interest accumulated and net of related bank fees, for the twelfth DOE payment;
- Allow the Company to continue to use its current financial institution;
- Require Xcel to provide this refund in combination with the Company's 2020 True-Up Refund if approved by the Commission within 90 days of the Commission's Order, unless Xcel demonstrates that it is not reasonable to provide the refund in this timeframe;
- Require the Company to provide a compliance filing within 30 days after completing the related bill credits; and
- Require Xcel to continue to file information and documentation consistent with the Commission's December 16, 2011 Order, Point 11, in Docket No. E002/M-11-807 within 30 days of receiving future DOE payments pursuant to the Extended Settlement Agreement.

/ar

CERTIFICATE OF SERVICE

I, Marcella Emeott, 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/M-21-815 and E002/M-15-1089

Dated this **23rd** day of **December 2021**

/s/Marcella Emeott

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_15-1089_M-15-1089
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