



414 Nicollet Mall  
Minneapolis, MN 55401

May 19, 2020

—Via Electronic Filing—

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

RE: REPLY COMMENTS  
2020 ANNUAL FUEL FORECAST AND MONTHLY FUEL COST CHARGES  
DOCKET NO. E002/AA-19-293

PROPOSED ADJUSTMENT TO THE 2020 ANNUAL FUEL FORECAST AND  
MONTHLY FUEL COST CHARGES  
DOCKET NO. E002/M-20-437

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to the Department of Commerce – Division of Energy Resources’ May 8, 2020 Comments and the Office of the Attorney General – Residential Utilities Division’s May 11, 2020 Comments regarding our proposed adjustment to the 2020 annual fuel forecast and monthly fuel cost charges.

We appreciate the recommendations from both the Department and the OAG that the Commission approve our proposed \$25 million reduction to the 2020 fuel forecast and grant a variance to the “significant unforeseen impact” five percent threshold if needed. We agree with the Department’s clarifications that a variance to the five percent threshold should not be used as a precedent in future fuel clause adjustment filings and that the Commission’s initially approved 2020 forecasted fuel cost should remain the benchmark for the 2020 fuel cost true-up filing.

As noted in our initial filing, and consistent with Ordering Point 3 of the Commission’s June 12, 2019 Order in Docket No. E999/CI-03-802, we intend to

implement the proposed rate adjustment on June 1, 2020, since no party has objected. The Company acknowledges, however, that should the Commission choose to address this proposed change, the Company will be prepared to make any adjustments the Commission may Order.

We have electronically filed this document with the Commission, and copies have been served to the parties on the attached service list. Please contact me at [allen.krug@xcelenergy.com](mailto:allen.krug@xcelenergy.com) or 612-330-6270 or Rebecca Eilers at [rebecca.d.eilers@xcelenergy.com](mailto:rebecca.d.eilers@xcelenergy.com) or 612-330-5570 at if you have any questions regarding this filing.

Sincerely,

/s/

ALLEN D. KRUG  
ASSOCIATE VICE PRESIDENT, STATE REGULATORY POLICY

c: Service List

## CERTIFICATE OF SERVICE

I, Lynnette Sweet, 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

**DOCKET NO. E002/AA-19-293**  
**E002/M-20-437**

Dated this 19<sup>th</sup> day of May 2020

/s/

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Lynnette Sweet

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