

July 6, 2020

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

RE: **Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E002/M-20-503

Dear Mr. Seuffert,

In its initial comments in the above-referenced docket, the Minnesota Department of Commerce (Department) requested that Northern States Power Company dba Xcel Energy (Xcel or the Company) provide an explanation and criteria used to determine whether a Conservation Improvement Program (CIP) should be tariffed. In addition, the Department recommended Minnesota Public Utilities Commission (Commission) approval of Xcel's request for a one-time waiver of certain requirements in its Peak Controlled Service Tariff, Peak Controlled Time-of-Day Tariff, and Energy Controlled Service Rider for the period from Commission approval through year-end 2020, and that the Commission direct the Company to submit, as a compliance filing, revised tariff pages describing the waiver requirements and specifying the termination date for the waiver.

On June 25, 2020, Xcel submitted reply comments. With respect to the question of when CIP programs are tariffed, the Company stated that it typically does not tariff its CIP programs when they provide a performance incentive or rebate for energy conservation activities; however, when the program includes a rate discount such as in the Peak-Controlled Service tariffs, Xcel includes the program in its tariff. The Department concludes that Xcel's explanation is reasonable.

Regarding tariff language describing the waiver requirements, Xcel indicated that it is willing to submit revised tariff pages, but prefers not to have temporary tariff changes included in its tariff because the inclusion of temporary language could result in customer confusion. The Department understands Xcel's concerns given the temporary nature of the changes being proposed, but continues to recommend some type of identification of the temporary changes in the tariff. The Department believes a simple reference at the start of each effected tariff that temporary changes are being made to the tariff requirements through year-end 2020 and a reference to this docket number would be sufficient notice. Including this information would provide a reference to anyone reviewing the tariff that additional changes may be in place without overburdening the Company with multiple tariff changes or causing customer confusion.

The Department continues to recommend that the Commission approve Xcel's request for a one-time waiver of certain requirements in its Peak Controlled Service Tariff, Peak Controlled Time-of-Day Tariff, and Energy Controlled Service Rider for the period from Commission approval through year-end

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2020, and direct Xcel to provide, as a compliance filing, the relevant revised tariff pages that include notice of the temporary changes with reference to this docket.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Rate Analyst Coordinator

SLP/ja

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
Letter**

Docket No.E002/M-20-503

Dated this **6th** day of **July 2020**

/s/Sharon Ferguson

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