

**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
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Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of the Application of Northern States Power Company, d/b/a Xcel Energy, for Authority to Increase Rates for Electric Service in the State of Minnesota

DOCKET NO. E-002/GR-19-564

**COMMENTS OF THE OFFICE OF
THE ATTORNEY GENERAL**

INTRODUCTION

The Office of the Attorney General—Residential Utilities and Antitrust Division (“OAG”) respectfully submits the following Comments in response to the Public Utilities Commission’s (“Commission”) Notice of Comment Period issued on November 6, 2019. The purpose of these Comments is to demonstrate that (1) the Commission should not allow Northern States Power Company (“Xcel” or “Company”) to recover interim rates that are not allowable under Minnesota Statutes section 216.B.16, subdivision 3 (“Interim Rate Statute”) and (2) that the Commission should establish guidelines for the form of any settlement it considers in order to avoid interim rate disputes in future proceedings.

Xcel’s “most recent rate proceeding”¹ resulted in a Stipulation of Settlement.² The Stipulation was effectively a so-called “black box settlement,” whereby the parties who settled³

¹ Docket No. E-002/GR-15-826. *See also* Minn. Stat. § 216B.16, subd. 3(b) (2019) (allowing recovery of “rate base or expense items the same in nature and kind as those allowed by a currently effective order of the commission in the utility’s most recent rate proceeding”).

² *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-002/GR-15-826, Stipulation of Settlement (Aug. 16, 2016) [hereinafter Stipulation].

³ The OAG was not a signatory to the Stipulation.

agreed to a series of overall rate increases, without explicitly addressing individual financial items.⁴ Ultimately the Commission “approve[d] the [Stipulation] in its entirety.”⁵ The Commission acknowledged that the Stipulation “proposes a revenue requirement but does not establish specific adjustments to the Company’s initially-proposed costs to reach its revenue requirement.”⁶ The Stipulation did “not define a rate base, provide an income statement, or determine a cost of service.”⁷

I. THE COMMISSION SHOULD NOT ALLOW THE COMPANY TO RECOVER INTERIM RATES THAT ARE NOT OF “THE SAME NATURE AND KIND” AS THOSE THAT WERE ALLOWED IN XCEL’S LAST RATE CASE.

The Interim Rate Statute specifies that interim rates may include “rate base or expense items the same in nature and kind as those allowed by a currently effective order of the commission in the utility’s most recent rate proceeding.”⁸ The Commission has previously determined that rate base items that “were not approved in the most recent rate case...must be excluded from the rate base for interim rates.”⁹

It is self-evident that, in order to determine whether rate base or expense items are the “same in nature and kind” as were authorized in the “most recent rate proceeding,” the Commission must compare specific cost items to approvals of those items in the prior proceeding. Without an approved rate base or income statement, it is difficult to see how the Commission can determine what “nature and kind” of rate base and expense items were

⁴ Stipulation at 4-5.

⁵ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-022/GR-15-826, FINDINGS OF FACT, CONCLUSIONS, AND ORDER at 68 (June 12, 2017) [hereinafter 2015 Order].

⁶ 2015 Order at 13.

⁷ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-022/GR-15-826, FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATIONS at 131 (Mar. 1, 2017) (adopted by 2015 Order at 68).

⁸ Minn. Stat. 216B.16, subd. 3(b)(2) (2019).

⁹ *In the Matter of a Petition by Minnesota Energy Resources Corporation for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-011/GR-13-617, ORDER SETTING INTERIM RATES at 3 (Nov. 27, 2013).

authorized in the last rate case. Under the Interim Rate Statute, the Commission cannot allow recovery of those items unless and until it can make such a determination.

“Illustrative,” “demonstrative,” or “representative” schedules or exhibits also cannot take the place of an approved rate base and income statement. Such schedules or exhibits, by their very nature, are not statements of what rate base or expense items the Commission actually approved. It would be unjust and unreasonable for ratepayers to pay interim rates based on any such schedules or exhibits, because by labeling them “illustrative,” “demonstrative,” or “representative,” ratepayer advocates and other intervenors would not have been on notice that those schedules or exhibits would eventually be used as a stand-in for a Commission-approved rate base and income statement, and thus would have had no reason to dispute their reasonableness or accuracy at the time they were filed. The Company seems to be in agreement on this point. It appended a series of “bridge schedules” that it described as “illustrative” to one of its witnesses’ surrebuttal testimony.¹⁰ In doing so, the Company explicitly noted that the bridge schedules “do not represent Parties’ positions on each issue.”¹¹ This shows that even the party submitting those “illustrative” schedules did not view them as actual descriptions of what it was asking the Commission to approve.

This is not merely a semantic distinction. The Interim Rate Statute is a powerful tool for the utility, whereby it receives unsubstantiated rate increases during the pendency of a rate case *without* a determination of the reasonableness of the utility’s costs or a meaningful opportunity for ratepayer advocates to contest those costs. In recognition of the potential dangers for ratepayers, the Interim Rate Statute also builds in ratepayer protections to prevent the abuse of

¹⁰ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-022/GR-15-826, Surrebuttal Testimony and Schedules-Charles R. Burdick at 2, Schedules 3-6 (June 12, 2017) [hereinafter Burdick Surrebuttal].

¹¹ Burdick Surrebuttal at 7.

this tool. One such protection is the requirement that rate base and expense items be of the same “nature and kind” as those approved in the Company’s last rate case. This strikes an important balance. If the utility’s costs are of a “nature and kind” that were approved in the last rate case, and have merely increased in magnitude due to inflation or other factors, the utility is allowed to recover those increases subject to true-up pending a final determination of rates. Ratepayers, on the other hand, are not required to pay for different types of costs that were not fully vetted in the last rate case.

In a previous rate case,¹² the Commission prescribed a methodology for addressing this concern. In that case, the Commission ordered Xcel to not include any categories of expenses that had been disallowed in its previous rate proceeding¹³ in its next interim rate petition, noting that in that rate case those issues “were settled collectively, not individually.”¹⁴ The need for this order point demonstrates that “collectively settled” issues cannot be the baseline against which interim rates are measured in subsequent rate cases. Accordingly, it is important that any interim rates allowed for rate base items or expenses in the instant proceeding only be those that are of the same “nature and kind” as those that were individually approved in the Company’s last rate case.

In the instant proceeding, the Company seeks to impose a rate increase of \$121.95 million on its ratepayers prior to any analysis of the prudence and reasonableness of the substantive contents of its rate case.¹⁵ Consistent with its statutory responsibilities, the Commission should not allow the Company to recover, as part of that increase, any rate base or

¹² Docket No. E-002/GR-10-971.

¹³ Docket No. E-002/GR-08-1065.

¹⁴ *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E-002/GR-10-971, Findings of Fact, Conclusions, and Order at 14 (May 14, 2012).

¹⁵ Notice of Change in Rates at 3.

expense items that are not of the “same nature and kind” that it actually approved in Xcel’s last rate case.

II. THE COMMISSION SHOULD REQUIRE PROPOSED SETTLEMENTS TO FULLY RESOLVE ANY ISSUES THAT IT ADDRESSES.

The interim rate issue previously discussed, as well as the dependence of other proceedings on an authorized rate of return, makes clear that the Commission should impose some parameters for any potential settlements in this rate case so as to ensure that future regulatory proceedings operate as intended and that all parties to this proceeding are treated fairly.

Minnesota Statutes section 216B.16, subdivision 1a, describes several provisions related to settlement of general rate cases. Specifically, it requires the Office of Administrative Hearings to convene a settlement conference¹⁶ and provides for the Commission to review and either accept or reject any “stipulated settlement of the case or parts of the case.”¹⁷

The first requirement the Commission should impose is to require any stipulated settlements to fully resolve any issue that they purport to settle. The concerns related to trying to apply the Interim Rate Statute to a rate case that reached a “black box” revenue requirement without explicitly addressing the underlying issues have already been discussed in these Comments. If the Commission required stipulated settlements to actually resolve the specific individual issues in a rate case, then the Commission would be able to apply the Interim Rate Statute to a complete set of rate base and expense decisions.

Similarly, the use of a return on equity (“ROE”) of 9.20 percent that Xcel could “represent” as its authorized ROE illustrates another important concern with entertaining

¹⁶ Minn. Stat. § 216B.16, subd. 1a(a) (2019).

¹⁷ Minn. Stat. § 216B.16, subd. 1a(b) (2019).

settlements that fail to fully address the settled issues. Utility regulation in Minnesota depends upon the Company having an approved ROE. For example, the transmission cost adjustment rider “allows a return on investment at the level approved in the utility’s last rate case.”¹⁸ Not having such an ROE deprives the public and regulators of a statutorily-defined default return. While there is a provision for approving a different return, not resolving the ROE issue in a rate case effectively guarantees that that provision will need to be utilized. Thus, parties with an interest in Xcel’s ROE need to prepare an ROE analysis in the rate case, and if there is no approved ROE, once again in the next rider proceeding that requires an approved ROE.

Such an outcome is neither necessary nor efficient. It remains unclear what public benefit there is in allowing a utility to “represent” to the investment community a completely fictional ROE number that is not tethered to any revenues that utility will receive.

The OAG’s recommendation is consistent with the statutory provision allowing for stipulated settlements that address “parts of the case.” Settlement need not include all issues in the case. Rather, whatever subset of issues any stipulated settlement purports to resolve should actually be explicitly and fully resolved.

In addition to requiring that any settled issues be explicitly and fully resolved, the Commission should also make clear that it will not entertain stipulated settlements that purport to settle the issues of parties that have not joined in the agreement. The Stipulation from Xcel’s last rate case included a list of issues that had been “resolved” that enumerated a series of issues, and listed the parties that took positions on those issues.¹⁹ While the list included a notation that the OAG did “not join the Settlement,” it listed several issues where the OAG was the *only* party to take a position against Company. An issue cannot possibly be said to be resolved when only two

¹⁸ Minn. Stat. § 216B.16, subd. 7b(b)(6) (2019).

¹⁹ Stipulation at Attachment 4.

parties have taken a position on it, and one of those parties is not a party to the settlement agreement. Accordingly, the Commission’s “ground rules” for evaluating stipulated settlements should include a requirement that all parties with a position on an issue must be in agreement before that issue is submitted to the Commission as “resolved.”

CONCLUSION

The Commission should not allow interim rates based on rate base or expense items not of the same “nature and kind” as those approved in Xcel’s last rate case. Additionally, the Commission should require that any issues submitted to it as part of a stipulated settlement be settled explicitly and fully with respect to both the content of those issues and the parties who have taken a position on those issues.

Dated: November 12, 2019

Respectfully submitted,

KEITH ELLISON
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State of Minnesota

s/ **Joseph C. Meyer**

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November 12, 2019

Mr. Daniel Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
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Re: *In the Matter of the Application of Northern States Power Company, dba Xcel Energy, for Authority to Increase Rates for Electric Service in the State of Minnesota*
Docket No. E-002/GR-19-564

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matter please find Comments of the Office of the Attorney General—Residential Utilities and Antitrust Division.

By copy of this letter all parties have been served. An affidavit of service is enclosed.

Sincerely,

s/ **Joseph C. Meyer**

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Enclosures

cc: Service List

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Docket No. E-002/GR-19-564

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, JUDY SIGAL, hereby state that on the 12th day of November, 2019, I efiled with eDockets *Comments* of the Office of the Attorney General–Residential Utilities and Antitrust Division, and served the same upon all parties listed on the attached services list via electronic submission and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

See Attached Service List

s/ Judy Sigal
JUDY SIGAL

Subscribed and sworn to before me
this 12th day of November, 2019.

s/ Patricia Jotblad
Notary Public
My Commission expires: January 31, 2020.

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