



414 Nicollet Mall
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May 12, 2016

—VIA ELECTRONIC FILING—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: REPLY COMMENTS
RENEWABLE ENERGY STANDARD RIDER
DOCKET NO. E002/M-15-805

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to the May 2, 2016 Comments of the Minnesota Department of Commerce – Division of Energy Resources on our Revised Petition requesting approval of our Renewable Energy Standard (RES) Rider true-up report for 2015, the 2016 RES Rider Revenue Requirements of \$17.2 million, and our proposed revised RES Adjustment Factor.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and served copies of the summary on the parties on the attached service lists.

If you have any questions regarding this filing please contact Pamela Gibbs at pamela.k.gibbs@xcelenergy.com or (612) 330-2889, or me at (612) 215-5367 or amy.s.fredregill@xcelenergy.com.

Sincerely,

/s/

AMY FREDREGILL
RESOURCE PLANNING AND STRATEGY MANAGER

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

IN THE MATTER OF THE REVISED
PETITION AND SUPPLEMENT OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF THE RENEWABLE
ENERGY STANDARD (RES) RIDER TRUE-
UP REPORT FOR 2015, REVENUE
REQUIREMENTS FOR 2016, AND A
REVISED RES ADJUSTMENT FACTOR

DOCKET No. E002/M-15-805

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to the May 2, 2016 Comments of the Minnesota Department of Commerce – Division of Energy Resources regarding our Revised Petition requesting approval of our Renewable Energy Standard (RES) Rider true-up report for 2015, the 2016 RES Rider Revenue Requirements of \$17.279 million, and our proposed revised RES Adjustment Factor of 0.822 percent. In these Comments, we provide an explanation for why we believe our proposed Adjustment Factor is appropriate and respond to the issues raised by the Department in its Comments, including recommendations related to the treatment of Accumulated Deferred Income Taxes (ADIT) and North Dakota Income Tax Credits (NDITCs).

REPLY

We appreciate the Department's thorough review of our petition and confirmation that we appropriately factored in the fees paid for the sale of Renewable Energy Credits (REC) in our calculation of REC sales credit refunded to customers and that our proposal to apply the forecasted allocators for 2015 and 2016, with a true-up to actual allocators when they are available, is appropriate. The Department also concluded in its comments that:

- Our treatment of return on Construction Work in Progress (CWIP) is reasonable, as allowed by Minnesota statutes;
- Our estimated 25-year life for the Courtenay Project appears reasonable;
- Our removal of internal labor costs appears reasonable; and
- Our 2015 True-up report provided in Attachment B is reasonable.

Based on this review, we continue to believe that our proposed RES Rider Revenue Requirements, reduced slightly by the update to 2014 PTCs, and associated RES Adjustment Factor of 0.822 percent are appropriate. This includes the capital costs and expenses associated with the Courtenay Wind Project as well as actual and forecasted 2015 Production Tax Credits (PTCs) for all Company-owned wind farms scheduled to be in-service by the end of 2015, off-set by proceeds received from REC sales.

The Department recommended in its Comments that the Company provide the following information with our Reply Comments:

- the bill impact associated with the 0.822 Adjustment Factor;
- the redline and clean tariff pages associated with the 0.822 percent Adjustment Factor; and
- a clarification that Minnesota is not being charged for any additional Allowance for Funds Used During Construction (AFUDC) attributable to any state after the eligibility date.

We provide the following information with this Reply in response to the Department's requests:

- The bill impact associated with the revised RES Adjustment Factor of 0.822 percent remains unchanged from the bill impact with the 0.820 percent RES Adjustment Factor, and would result in an increase of approximately \$0.55 for a typical residential customer using 750 kWh per month.
- Attachment A shows the clean and redline tariff pages associated with the 0.822 percent Adjustment Factor. We also note that we will also provide the clean and redline tariff sheets as part of our compliance filing in this Docket.
- In Section A below, we discuss our treatment of AFUDC in the RES Rider.

The Department also recommended several revisions to the customer notice that will be provided on customer bills on page 19 of its Comments. We agree to make those revisions.

In addition, the Department recommended that the Commission require the Company to:

- file copies of all the relevant 2015 tax forms supporting 2015 actual Production Tax Credit (PTC) figures in our next RES true-up filing;
- provide detailed revenue collections by customer class in addition to the summary it provides in its future RES Rider filings; and
- credit the slightly higher level of actual PTCs for 2014 to ratepayers in the Company's instant RES true-up.

We agree to provide all the relevant 2015 tax forms supporting 2015 actual Production Tax Credit (PTC) figures in our next RES true-up filing. Future RES Rider true-up filings will provide the previous year's tax forms, when available, to assist in the Department's review. In addition, we will provide detailed revenue collections by customer class in future RES Rider filings.

We also agree to credit the higher level of actual 2014 PTCs in this RES true-up. This slight difference in PTCs was due to a tax adjustment made after our filing. We provided this actual tax information in the Second Revised Petition, filed September 29, 2015. We note that this small change to the PTCs did not result in any change to the RES Adjustment Factor, as filed in our Second Revised Petition.

A. Allowance for Funds Used During Construction

The RES Rider includes a current return on CWIP as part of the revenue requirement calculation. As such, the capital projects associated with the RES Rider do not include the accumulated AFUDC as part of rate base. To prevent double recovery between AFUDC and a current return on CWIP, an accounting mechanism referred to as "Pre-funded AFUDC" is calculated based on the eligibility date and credited against the Minnesota jurisdictional amount of AFUDC related to the RES Rider.

This treatment, in effect, reduces the income offset provided by AFUDC and reduces the accumulated AFUDC that is added to rate base when a project is placed into service. The Company tracks Pre-funded AFUDC and the non-rider AFUDC separately so that the Minnesota jurisdictional customers are assured of receiving the entire benefit in lower fixed asset costs during the in-service period for the assets included in rate riders. In this way, we ensure that costs are recovered in the appropriate jurisdictions, pursuant to their specific ratemaking procedures.

B. Accumulated Deferred Income Taxes (ADIT) Prorate

The Department recommended that the Commission require Xcel Energy to replace our forecasted prorated ADIT balances with actual non-prorated ADIT balances in its beginning-of-month and end-of-month average ADIT balance calculations for

true-up purposes in future rate rider filings. Alternatively, the Department recommended that the Commission could require Xcel Energy's riders to be based solely on historical costs.

We note that we plan to address the ADIT issue in our currently pending rate case (Docket No. E002/GR-15-826). Specifically, we plan to address it in a supplement to our response to the Department's Information Request No. 1139 which deals with this same topic. The rate case is a more appropriate forum for this issue for two reasons. First, the potential consequences of the outcome of this complex issue go beyond riders and developing the issue in the rate case will allow further analysis and comments. Second, due to the timing of the true-up, the issue does not need to be decided immediately so the rate case procedural schedule will allow a more thorough discussion and perhaps additional clarity on the topic before our next series of annual rider filings are heard at the Commission.

With regard to the Department's alternative solution, using historical test years for riders, we note that there are customer benefits associated with the use of accelerated tax methods in the forecast period that that would disappear with the use of a historical test year. If the Commission wishes to explore the use of historical test years for riders, we believe there should be additional record development.

C. 2016 RES Adjustment Factor Implementation

The Department recommended in their Comments that the Commission require Xcel Energy to implement the 2016 Adjustment Factor in the beginning of the month following the Commission's Order in this Docket. We assume this recommendation to mean that we should implement the RES Adjustment Factor as proposed and further modified here (0.822 percent). We agree to this recommendation, but note that the Commission will be approving this petition later than the proposed implementation date of January 1, 2016, and the rate has been at zero for the intervening months. Therefore, the true-up balance at the end of the year will be higher than calculated, meaning a higher rate charged to customers for 2017. Although we will collect the same 2016 Revenue Requirement, the shortened 2016 recovery period, without a commensurate increase in the RES rate, will necessarily shift recovery of these 2016 costs into 2017.

D. North Dakota Income Tax Credit (NDITC)

The Department also recommended that the Company be required to credit our Minnesota ratepayers for their proportionate share of used NDITCs associated with the Courtenay Wind Project, based on the pro-rata share of the costs of the

Courtenay project that is charged to Minnesota ratepayers. Alternatively, the Department recommended that the Commission allow none of the costs of the Courtenay project to be charged to Minnesota ratepayers in this rider petition.

The NDITCs for the Courtenay Wind project are \$0 in 2016 and 2017. Although the Courtenay Wind project qualifies for the NDITC, the credit is limited by the Company's North Dakota taxable income. The Border Winds project will be in service sooner than Courtenay and is expected to generate sufficient NDITCs to offset the Company's anticipated tax liability for all but the last year that Courtenay qualifies for the NDITC.

In its Order approving the Courtenay Wind acquisition, the Commission deferred its decision regarding allocation of the NDITC to a later proceeding- either the Company's renewable energy rider or electric rate case. Because there is no available NDITC for 2016 and 2017, the issue of whether it is appropriate to proportionally share the NDITC with Minnesota ratepayers is more suitable for evaluation in the Company's current rate case rather than in this docket. The Company's position with respect to the Minnesota treatment of NDITCs is contained in Docket No. E002/GR-15-826 in the Direct Testimony of Company witness Ms. Anne E. Heuer in section IX Compliance with Prior Commission Orders, part E, Other Compliance Requirements, Item 6, North Dakota Income Tax Credits.

Given the discussion above, and particularly the fact that the NDITCs for the Courtenay Wind Project are \$0 in 2016 and 2017, the Department's alternative recommendation – to deny the recovery of any of those costs associated with the Courtenay project from Minnesota ratepayers through this Rider – need not be addressed at this time. The issue can be addressed more holistically in the rate case.

CONCLUSION

We appreciate the Department's review and the opportunity to provide additional information in these Reply Comments. We respectfully request that the Commission approve the proposed 2016 RES Rider Revenue Requirements and associated Adjustment Factor, as supplemented on September 29, 2016 in this filing.

Dated: May 12, 2016

Northern States Power Company

Redline

Northern States Power Company, a Minnesota corporation
Minneapolis, Minnesota 55401
MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2

PROPOSED

RENEWABLE ENERGY STANDARD RIDER (Continued)

Section No. 5

~~9th~~10th Revised Sheet No. 147

DETERMINATION OF RES ADJUSTMENT FACTOR

The Renewable Energy Standard ("RES") Adjustment Factor shall be the RES annual forecasted revenue requirement as a percentage of "base" revenues. The RES annual forecasted revenue requirement shall be the sum of the Renewable Energy Standard Costs for the forecast period and any residual Tracker balance in the RES Tracker Account.

The RES Adjustment Factor may be adjusted with the approval of the Minnesota Public Utilities Commission (Commission). The RES Factor is:

All Classes

~~0.000%~~0.822%

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RENEWABLE ENERGY STANDARD COSTS

The RES Costs shall be the annual revenue requirements including operation and maintenance (O&M) expenses for Company owned Renewable Energy Project costs and capacity related renewable energy purchased power costs not recoverable through the FCR, that are eligible for recovery under Minnesota Statute Section 216B.1645. A standard model will be used to calculate the total forecasted revenue requirements for each annual period that is determined by the Commission to be eligible for recovery under this Renewable Energy Standard Rider.

RES TRACKER ACCOUNT

For each annual true-up period, a true-up adjustment to the RES Tracker Account (residual Tracker balance) will be calculated reflecting the difference between the RES Adjustment recoveries and the actual expenditures for such period. The true-up adjustment shall be included in calculating the RES Adjustment Factor effective with the start of the next annual recovery period.

The RES Adjustment Factor includes a true-up of actuals as available for the previous recovery period and forecast information for the remainder of the recovery period. The Final true-up adjustment for a previous recovery period will be determined by September 1 of the following year, at which time the Company will record a Final adjustment to the RES Tracker Account.

All costs appropriately charged to the RES Tracker Account shall be eligible for recovery through this rider.

PROVISION OF FORECAST DATA

To assist commercial and industrial customers in budgeting and managing their energy costs, the Company will annually make available on September 1st a 24-month forecast of the RES Adjustment Factor applicable to demand billed C&I customers under this Rider. The forecast period begins January 1st of the following year. This forecast will be provided only to customers who have signed a protective agreement with the Company.

Date Filed: ~~03-30-15~~09-29-15

By: Christopher B. Clark

Effective Date: ~~08-01-15~~

President, Northern States Power Company, a Minnesota corporation

Docket No. E002/M-15-~~304~~805

Order Date: ~~06-01-15~~

Clean

Northern States Power Company, a Minnesota corporation
Minneapolis, Minnesota 55401
MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2

PROPOSED

RENEWABLE ENERGY STANDARD RIDER (Continued)

Section No. 5
10th Revised Sheet No. 147

DETERMINATION OF RES ADJUSTMENT FACTOR

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The RES Adjustment Factor may be adjusted with the approval of the Minnesota Public Utilities Commission (Commission). The RES Factor is:

All Classes	0.822%	R
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RENEWABLE ENERGY STANDARD COSTS

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Date Filed:	09-29-15	By: Christopher B. Clark	Effective Date:
		President, Northern States Power Company, a Minnesota corporation	
Docket No.	E002/M-15-805		Order Date:

CERTIFICATE OF SERVICE

I, Jim Erickson, 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/M-15-805

Dated this 12th day of May 2015

/s/

Jim Erickson
Regulatory Administrator

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