

October 15, 2020

William Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101

RE: Docket No E002/M-20-662 Pandemic And Civil Unrest Recovery Program

Dear Mr. Seuffert:

The City of Minneapolis (“Minneapolis”) thanks the Commission for the opportunity to offer reply comments on Xcel Energy’s economic recovery proposal to offer a temporary discount for commercial and industrial (C&I) customers with pre-pandemic loads under 100 kW to help business customers affected by the pandemic or the civil unrest.

Xcel Proposes within the proposed new Pandemic And Civil Unrest Recovery Program tariff:

RATE

The rates and provisions of the customer's regular rate schedule shall apply except a 25 percent credit shall be applied to the total monthly base rate charges excluding customer charges, after the application of voltage discounts, for the period ending March 31, 2021.¹

Minneapolis supports and appreciates the program proposal from Xcel. Many of our businesses have been impacted by the pandemic and civil unrest and are in need of relief. This program would provide much needed assistance to our small business community.

The proposed tariff also includes the following:

REVENUE RECOVERY

The Company, within a general rate case, is allowed to seek recovery of the Program credits made to customers.²

In considering Comments filed by the Office of Attorney General (OAG) on September 14, the OAG generally supported the petition with a modification to the proposed revenue recovery as follows:

The Commission should grant Xcel’s petition with one condition related to cost recovery. In approving the BIS Rider relief program, the Commission authorized Xcel to seek recovery of the cost of the

¹ Docket 20-662. Xcel Pandemic And Civil Unrest Recovery Program Proposal within MN Electric Rate Book. Section No. 5 Sheet No. 159. Aug 14, 2020.

² *Id.*

credits in a future rate case, on the condition that the Company “provide a cost/benefit analysis demonstrating the reasonableness of any cost recovery, including the full amount of the COVID-19 credits given and the sales revenue stimulated and retained.” By imposing this requirement, the Commission acknowledged that providing these discounts benefits Xcel, helping the Company retain load that it could otherwise lose.

For the same reason, the Commission should require Xcel to track both costs and revenues related to this program so that any proposed recovery of deferred costs can be offset by the corresponding benefits accruing for the same period. If the benefit to Xcel from offering the credits exceeds the cost of those credits, recovering deferred costs from ratepayers would not be just and reasonable.³

Minneapolis supports the OAG’s recommendation to approve Xcel’s proposed program with the requirement to offset the recovery of deferred costs by the associated benefits. This will help balance the need to support small businesses with near-term relief with the interests of non-participating customers and ensure that cost recovery from customers is better aligned with actual costs.

Thank you for your consideration.

Sincerely,



Mr. Kim W. Havey, LEED AP, AICP
Division of Sustainability

³ Docket No. E-002/M-20-662. Comments. Office of the Attorney General.

STATE OF MINNESOTA)
) ss. **CERTIFICATE OF SERVICE**
COUNTY OF HENNEPIN)

I, Stacy A. Miller, of the City of Minneapolis, County of Hennepin, State of Minnesota, affirm that on the 15th day of October 2020, I served a copy of the following via e-mail and/or via U.S. Mail:

REPLY COMMENTS of the City of Minneapolis regarding Docket No. 20--662

at the last known mailing addresses and email addresses of said entities/individuals on the attached Service List. If by U.S. Mail, I placed said document in postage prepaid envelope and placed same in the U.S. Post Office in Minneapolis, Minnesota for delivery by the United States Postal Service.



Stacy A. Miller

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