



414 Nicollet Mall
Minneapolis, MN 55401

August 14, 2020

—Via Electronic Filing—

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

RE: PETITION
PANDEMIC AND CIVIL UNREST RECOVERY PROGRAM
DOCKET NO. E002/M-20-____

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Petition for approval of a Pandemic and Civil Unrest Recovery Program in compliance with the July 27, 2020 ORDER APPROVING PROPOSED CHANGES WITH MODIFICATIONS in Docket No. E002/M-20-436. Our proposal is designed to provide relief for commercial and industrial customers that had peak monthly loads of less than 100 kW before the COVID-19 pandemic.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Holly Hinman at Holly.R.Hinman@xcelenergy.com or (612) 330-5941, or Lisa Peterson at Lisa.R.Peterson@xcelenergy.com or (612) 330-7681 if you have any questions regarding this filing.

Sincerely,

/s/

AMY LIBERKOWSKI
DIRECTOR, REGULATORY PRICING AND ANALYSIS

Enclosures
c: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF A PANDEMIC AND
CIVIL UNREST RECOVERY PROGRAM

DOCKET NO. E002/M-20-____

PETITION

INTRODUCTION

Northern States Power Company, a Minnesota corporation, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Proposal for a relief program for small business customers in compliance with the Commission's July 27, 2020 ORDER APPROVING PROPOSED CHANGES WITH MODIFICATIONS¹ and in response to the impacts of the COVID-19 virus and recent civil unrest.

Ordering paragraph 1.C. of the Order states:

C. By August 14, 2020, Xcel shall file a proposal designed to provide relief for commercial and industrial customers that had peak monthly loads of less than 100 kW before the COVID-19 pandemic.

As has been the case with the Company's other recent filings targeting economic relief and recovery, we file this program during an extraordinary time, where Governor Walz has declared a Peacetime State of Emergency and many businesses, schools, and other institutions are closed in order to encourage social distancing and to slow the community spread of the COVID-19 virus. Further, parts of our service territory in the metro area recently experienced a period of intense civil unrest that, for some customers, exacerbated the economic challenges they face. The impact of these extraordinary recent events are still emerging, yet it is already clear that some companies are experiencing such significant declines in their businesses that they are at risk of failure.

¹ Docket No. E002/M-20-436

The Company has developed a second temporary program, this one aimed at small businesses who experience material decline in energy demand as a result of the state's pandemic response or recent civil unrest. The goal of this temporary program is to assist those customers experiencing material declines in their businesses and associated energy use. The Company hopes that with short term assistance some customers will be positioned to maintain their business through this challenging time. By retaining at-risk customers, the Company also mitigates the risk of further sales losses.

I. SUMMARY OF FILING

A one-paragraph summary of the filing accompanies this petition pursuant to Minn. R. 7829.1300, subp. 1.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. Stat. § 216.17 subd. 3 and Minn. R. 7829.1300, subp. 2, Xcel Energy has electronically filed this petition. A summary of the filing has been served on all parties on Xcel Energy's miscellaneous electric service list and the service list for Docket No. E002/M-20-436 (attached).

III. GENERAL FILING INFORMATION

Pursuant to Minnesota Rules 7825.3200, 7825.3500, and 7829.1300, subp. 3, Xcel Energy provides the following required information:

A. Name, Address, and Telephone Number of Utility

Northern States Power Company, doing business as:
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Matt B. Harris
Assistant General Counsel
Xcel Energy
414 Nicollet Mall, 401 – 8th Floor
Minneapolis, MN 55401
(612) 330-7641

C. Date of Filing and Date Modified Rates Take Effect

Xcel Energy submits this petition for approval on August 14, 2020. The proposed effective date for the proposed tariff revisions is October 1, 2020.

D. Statute Controlling Schedule for Processing the Filing

The applicable statute is Minn. Stat. § 216B.16, subd. 1, which allows a tariff change to be placed into effect on 60-days notice to the Commission, unless the proposed tariff is suspended by Commission order. The proposed tariff changes discussed in this Petition fall within the definition of a “miscellaneous filing,” under Minn. R. 7829.0100, subp. 11, because no determination of Xcel Energy’s general revenue requirement is necessary. Minn. R. 7829.1400, subps. 1 and 4, permits comments in response to a miscellaneous filing within 30 days of filing, with reply comments 10 days thereafter.

E. Utility Employee Responsible for Filing

Holly Hinman
Regulatory Manager
Xcel Energy
414 Nicollet Mall, 401 – 7th Floor
Minneapolis, MN 55401
(612) 330-5941

IV. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, Xcel Energy requests that the following persons be placed on the Commission’s official service list for this matter:

Matt B. Harris
Assistant General Counsel
Xcel Energy
414 Nicollet Mall, 401 – 8th Floor
Minneapolis, MN 55401
matt.b.harris@xcelenergy.com

Lynnette Sweet
Regulatory Administrator
Xcel Energy
414 Nicollet Mall, 401 – 7th Floor
Minneapolis, MN 55401
regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to the Regulatory Records email address above.

V. DESCRIPTION AND PURPOSE OF FILING

A. Background

On April 23, the Company proposed revisions to its Business Incentive and Sustainability (BIS) Rider to include a temporary discount for commercial and industrial (C&I) customers materially affected by the COVID-19 pandemic. In the Order approving that program for customers with pre-pandemic loads between 100 kW and 2000 kW, the Commission also required the Company to submit a proposal to help smaller business customers affected by the pandemic or the civil unrest.

B. Purpose of the Filing

The purpose of this filing is to seek approval of a temporary program for C&I customers with pre-pandemic loads under 100 kW experiencing significant reductions in their monthly peak loads as a direct result of the COVID-19 pandemic or the recent civil unrest.

The Company proposes to offer these C&I customers an opportunity to apply for participation in a temporary program addressing substantial load reductions directly associated with the COVID-19 pandemic or the recent civil unrest. Customers in this size range include restaurants, small retail shops, grocery and convenience stores, pharmacies, printers and small manufacturers. To qualify for the program, customers must demonstrate they have experienced a minimum 25 percent peak load reduction compared to their prior monthly peak load for the twelve months preceding February 2020. For non-demand billed customers, load reductions will be estimated based on energy usage. If the application is approved by the Company, the customer will be eligible to receive a 25 percent credit applied to the customer's total monthly base rate charges, excluding customer charges. The credits will be applied from the time of approval through March 31, 2021, at which time the customer's normal rates would resume. Maximum participation in the program is limited to a total of 50 MW of customer loads, measured by the total average load (prior to the impact of the pandemic or civil unrest) of participating customers.

As part of this Petition, the Company is also requesting Commission approval to defer recovery the amount of customer credits to its next rate case. This is consistent with the Commission's Order approving the temporary BIS Rider discount for COVID-19 affected customers between 100 kW and 2 MW.

The program is designed to provide credits to base rates over a limited duration and to close its availability once the program size limit is reached.

It is the Company's view that this proposal is a reasonable response to the unprecedented risk of business customer failure as it offers a short-term discount program aimed at supporting struggling small business customers. By retaining revenue-generating customers who might otherwise fail, the Company hopes to mitigate the risk of further sales losses brought about by the pandemic response or the civil unrest.

We include the following attachments regarding the temporary program.

Attachment A	Proposed Tariff
Attachment B	Proposed Application
Attachment C	Proposed Compliance Report
Attachment D	Proposed Customer Notifications (onsert and e-mail to trade organizations)

1. *Tariffs*

Attachment A contains our proposed tariff sheets for our Electric Rate Book in redline and clean format as follows:

Minnesota Electric Rate Book – MPUC No. 2

- Sheet No. 1-3, revision 18
- Sheet No. 5-TOC-2, revision 18
- Sheet No. 5-159, original

2. *Proposed Application*

Attachment B contains our proposed Application.

3. *Proposed Reporting Requirements*

The Company will file with the Commission a monthly report providing a list of participating customers, each customer's average peak load for the 12 months ending February 2020, each customer's peak load at the time of application, and the date of each application (see Attachment C). For non-demand billed customers, the report will provide the 12 months average kWh usage prior to February 2020 and the kWh usage at the time of application. The Company will also file a final report that will identify the total number of customers that participated in the program and the total amount of program credits provided.

4. *Proposed Onsert*

The Company intends to communicate about this program with customers primarily through targeted email and bill onsert. Attachment D1 contains our proposed Onsert. Attachment D2 is our proposed e-mail to the Chamber of Commerce.

C. Reasonableness of Proposed Changes

With respect to the temporary program proposed here, we believe the features of the proposal are reasonable and thoughtfully calibrated to deliver relief to a subset of impacted customers who might otherwise be at risk of failure. Further, the program is reasonably limited in scope, providing a short-term benefit in the form of base rate credits. The program is designed to provide credits to base rates over a limited duration for participating customers.

VI. EFFECT OF CHANGE UPON XCEL ENERGY

Xcel Energy's total revenue recovery is affected by the quantity of base rate discounts provided to customers under the temporary program proposed in this Petition. While these discounts will be reflected in our next rate case, the total revenue impact is expected to be positive by virtue of the sales retained from the program.

CONCLUSION

Xcel Energy respectfully requests that the Commission approve this temporary program aimed at small business customers materially affected by the COVID-19 pandemic or the recent civil unrest.

Dated: August 14, 2020

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF A PANDEMIC AND
CIVIL UNREST RECOVERY PROGRAM

DOCKET No. E002/M-20-____

PETITION

SUMMARY OF FILING

Please take notice that on August 14, 2020, Northern States Power Company, doing business as Xcel Energy, filed with the Minnesota Public Utilities Commission its Petition for approval of a pandemic and civil unrest recovery program for small business customers materially affected by the COVID-19 pandemic or civil unrest.

Redline

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~~17th~~18th Revised Sheet No. 3

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Date Filed:	05-19-16 <u>08-14-20</u>	By: Christopher B. Clark	Effective Date:	06-01-18
		President, Northern States Power Company, a Minnesota corporation		
Docket No.	E002/M- 13-315 & E999/CI-15-115 <u>20-</u>		Order Date:	04-20-18

MINNESOTA ELECTRIC RATE BOOK – MPUC NO. 2

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**PANDEMIC AND CIVIL UNREST RECOVERY
PROGRAM**

Section No. 5
Original Sheet No. 159

AVAILABILITY

Available to existing commercial and industrial customers with pre-pandemic average monthly peak load below 100 kW as measured during the 12 months ending February 2020, which is substantially reduced as a direct result of the COVID-19 coronavirus pandemic or recent civil unrest. Participation in this Program is subject to Company approval and is limited to a pre-pandemic total load level of 50 MW.

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.

QUALIFICATION REQUIREMENTS

Existing customers must have experienced a material and minimum 25 percent peak load reduction in direct response to civil unrest or government mandated requirements associated with the COVID-19 pandemic. The customer shall notify the Company in writing and document the qualifying basis for the electric load reduction and the associated kW load reduction. Following such notification, the Company will review the customer's monthly billing demands to confirm a material and qualifying peak load reduction or estimate the load reduction based on energy usage for non-demand billed customers. If approved by the Company, Program credits will be applied to the customer's bill from the beginning of the billing period during which the customer is approved for the Program until March 31, 2021. The Company may discontinue the Program credits if customer peak loads or energy usage return to levels prior to qualifying load reductions.

APPLICATION

As a condition of qualifying for this Program, Customer must provide an application to the Company demonstrating that civil unrest or the COVID-19 pandemic has materially impacted its business and is responsible for a qualifying load reduction. Information tying the Customer's identification to the billing demands or energy usage considered for the Program is trade secret information under the Minnesota Government Data Practices Act ("Act").

REPORTING REQUIREMENT

Monthly during the of the availability of the Program, the Company will file with the Commission a listing of Customers deemed eligible and participating in the program. Following Program completion, the Company will file a final report with the Commission identifying the number of customers that participated in the Program and the total amount of Program credits provided.

REVENUE RECOVERY

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

Date Filed: 08-14-20

By: Christopher B. Clark

Effective Date:

President, Northern States Power Company, a Minnesota corporation

Docket No. E002/M-20-

Order Date:

Clean

MINNESOTA ELECTRIC RATE BOOK - MPUC NO. 2

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Date Filed:	08-14-20	By: Christopher B. Clark	Effective Date:
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Docket No.	E002/M-20-		Order Date:

MINNESOTA ELECTRIC RATE BOOK – MPUC NO. 2

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**PANDEMIC AND CIVIL UNREST RECOVERY
PROGRAM**

Section No. 5
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AVAILABILITY

Available to existing commercial and industrial customers with pre-pandemic average monthly peak load below 100 kW as measured during the 12 months ending February 2020, which is substantially reduced as a direct result of the COVID-19 coronavirus pandemic or recent civil unrest. Participation in this Program is subject to Company approval and is limited to a pre-pandemic total load level of 50 MW.

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.

QUALIFICATION REQUIREMENTS

Existing customers must have experienced a material and minimum 25 percent peak load reduction in direct response to civil unrest or government mandated requirements associated with the COVID-19 pandemic. The customer shall notify the Company in writing and document the qualifying basis for the electric load reduction and the associated kW load reduction. Following such notification, the Company will review the customer's monthly billing demands to confirm a material and qualifying peak load reduction or estimate the load reduction based on energy usage for non-demand billed customers. If approved by the Company, Program credits will be applied to the customer's bill from the beginning of the billing period during which the customer is approved for the Program until March 31, 2021. The Company may discontinue the Program credits if customer peak loads or energy usage return to levels prior to qualifying load reductions.

APPLICATION

As a condition of qualifying for this Program, Customer must provide an application to the Company demonstrating that civil unrest or the COVID-19 pandemic has materially impacted its business and is responsible for a qualifying load reduction. Information tying the Customer's identification to the billing demands or energy usage considered for the Program is trade secret information under the Minnesota Government Data Practices Act ("Act").

REPORTING REQUIREMENT

Monthly during the of the availability of the Program, the Company will file with the Commission a listing of Customers deemed eligible and participating in the program. Following Program completion, the Company will file a final report with the Commission identifying the number of customers that participated in the Program and the total amount of Program credits provided.

REVENUE RECOVERY

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

Date Filed: 08-14-20

By: Christopher B. Clark

Effective Date:

President, Northern States Power Company, a Minnesota corporation

Docket No. E002/M-20-

Order Date:

N

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Application

Minnesota

Clear form



Customer Application for Pandemic and Civil Unrest Recovery Program

Customer information

Applicant/customer legal name _____

Customer representative name _____ Title _____

Service address _____

City _____ State _____ Zip _____

Program qualification

Has your business been materially impacted by circumstances related to the Peacetime Emergency/outbreak of COVID-19, and/or the civil unrest? Yes No

If yes, please describe the material impact on your business.

Have your business's peak electric load requirements been materially impacted by circumstances related to the Peacetime Emergency/outbreak of COVID-19 and/or civil unrest? Yes No

If yes, please describe the impact on your business's peak electric load requirements.

By checking this box, I agree to provide such additional information as Xcel Energy determines necessary to support this Application. I acknowledge that this Application and any information provided to Xcel Energy in support of this Application may be provided to the Minnesota Public Utilities Commission and/or other Minnesota regulatory agencies. Information tying the Customer's identity to qualified billed demand and COVID-19 and civil unrest impacts to business and energy usage provided in support of this Application are trade secrets of the Applicant and will be marked Trade Secret pursuant to Minnesota Government Data Practices Act.

Application for Pandemic and Civil Unrest Recovery Program

[Xcel Energy representative/Title] _____.

state as follows:

1. The legal name of the customer applying for service under Xcel Energy's Pandemic and Civil Unrest Recovery Program is _____ ("Applicant").
2. I am a representative of Northern States Power Company ("Xcel Energy").
3. Applicant is an existing customer of Xcel Energy.
4. Applicant qualifies as a customer under the Pandemic and Civil Unrest Recovery Program because:
 - a. The Applicant's average monthly peak load was below 100 kW during the 12 months ending February 2020; and
 - b. As compared to the Applicant's average monthly peak load during the 12 months ending February 2020, of _____ kW the Applicant experienced a minimum of a 25 percent peak load reduction, currently at _____ kW, a _____ % reduction.
5. I acknowledge that this Application may be provided to the Minnesota Public Utilities Commission and/or other Minnesota regulatory agencies. Information tying the Customer's identity to its qualified billed demand or energy usage provided in support of this Application are trade secrets of the Applicant and will be marked Trade Secret pursuant to Minnesota Government Data Practices Act.

Signature

Date

PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED

Northern States Power Company
Proposed Monthly Report Template

Docket No. E002/M-20-____
Petition
Attachment C
Page 1 of 2

Temporary COVID-19 Pandemic and Civil Unrest Recovery Program Participants
Monthly Report
Applications received during month of _____

<u>Customer Name</u>	<u>Application Date</u>	<u>Average Peak Load for 12 Months Ending February 2020 (kW)</u>	<u>Peak Load at Time of Application (kW)</u>	<u>Reduction in kW</u>	<u>% Reduction</u>
[PROTECTED DATA BEGINS					
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
PROTECTED DATA ENDS]					
TOTAL					

**PUBLIC DOCUMENT
NOT PUBLIC DATA HAS BEEN EXCISED**

Northern States Power Company
Proposed Annual Report Template

Docket No. E002/M-20-____
Petition
Attachment C
Page 2 of 2

**Temporary COVID-19 Pandemic and Civil Unrest Recovery Program Participants
Annual Report**

	<u>Customer Name</u>	<u>Application Date</u>	<u>Average Peak Load for 12 Months Ending February 2020 (kW)</u>	<u>Peak Load at Time of Application (kW)</u>	<u>Reduction in kW</u>	<u>% Reduction</u>	<u>Total Discount</u>
	[PROTECTED DATA BEGINS						
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
	PROTECTED DATA ENDS]						
	TOTAL						



HELP FOR SMALL BUSINESS CUSTOMERS AFFECTED BY THE COVID-19 PANDEMIC OR CIVIL UNREST

Xcel Energy is committed to helping businesses get back on their feet after being affected by the COVID-19 pandemic or civil unrest. If your business saw an electric load decrease of 25% or more as a direct result of the pandemic or civil unrest, you may qualify for a 25% discount on the base energy and demand charges on your bill through March 31, 2021.

To find out more and apply for the discount, contact your dedicated Xcel Energy account manager, or call the Business Solutions Center at **800.481.4700**.

Email template

Subject Line: Help with energy bills for Minnesota small businesses affected by COVID-19 or civil unrest

(Send to the Chamber of Commerce)

Xcel Energy has a new temporary rate discount available to qualifying Xcel Energy small business customers in Minnesota. Please distribute this information to your members and network.

Xcel Energy is committed to helping small businesses get back on their feet after being affected by the COVID-19 pandemic or civil unrest. We recently received approval to offer a temporary rate discount to help small businesses that have experienced a direct material impact from the pandemic or civil unrest as represented by an electric load decrease of 25% or more in electric demand.

Your business may qualify for a temporary 25% discount on the base energy and demand charges on your bill through March 31, 2021. The availability of this temporary discount requires a customer application for review and approval, and participation is limited. To find out more details and apply for the discount, contact your dedicated Xcel Energy account manager, or call the Business Solutions Center at 800.481.4700.

CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies or summaries 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-20-436
Xcel Energy's Miscellaneous Electric Service List

Dated this 14th day of August 2020

/s/

Lynnette Sweet
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-436_M-20-436
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-436_M-20-436
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