414 Nicollet Mall
Minneapolis, MN 55401

November 14, 2024

—Via Electronic Filing—

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

RE: REPLY COMMENTS
IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY, DBA XCEL ENERGY, FOR APPROVAL OF A RESIDENTIAL TIME OF USE RATE DESIGN
DOCKET NO. E002/M-23-524

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments in response to the August 8, 2024 FOURTH NOTICE OF EXTENDED COMMENT PERIOD of the Minnesota Public Utilities Commission in the above-referenced docket.

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 Brandon Kirschner at 612-215-5361 or Brandon.M.Kirschner@xcelenergy.com or contact me at Holly.R.Hinman@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

HOLLY HINMAN
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosure
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Hwikwon Ham	Commissioner
Valerie Means	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY, DBA XCEL ENERGY, FOR APPROVAL OF A RESIDENTIAL TIME OF USE RATE DESIGN	DOCKET NO. E002/M-23-524 **REPLY COMMENTS**

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy (Company), submits these Reply Comments pursuant to the Fourth Notice of Extended Comment Period issued August 8, 2024 by the Minnesota Public Utilities Commission (Commission).

We appreciate the thoughtful comments from parties and are thankful for their engagement with this proceeding. In these Reply Comments, we address topics raised by parties in their October 15, 2024 comments. The topics we discuss in this Reply are as follows:

- Rate Implementation
- Bill Protections and Shadow Billing
- Rate Design
- Customer Education and Engagement Plan
- Enabling Technologies and Load Flexibility Devices
- Compliance Filings and Reporting Requirements

After reviewing the Comments of parties, the Company recommends that the Commission approve our proposed optional Residential Time of Use (TOU) rate as presented in our August 16, 2024 Supplement.

REPLY COMMENTS

I. RATE IMPLEMENTATION

The Minnesota Department of Commerce (Department), Citizens Utility Board (CUB), and Fresh Energy advocate for a deliberate approach to implementing the TOU rate, with the ultimate goal of a default TOU rate for all residential customers with the option to opt-out. We agree that rate design and customer transitions should be approached with deliberate care. The Company continues to support a path that offers a new TOU rate on a voluntary, opt-in basis, rather than as a default opt-out rate.

A. Company Continues to Support Offering TOU Rates on an Opt-in Basis

Customer feedback supports that customers prefer optionality and value choice with respect to whether a TOU rate makes sense for their home and lifestyle. A default rate, whereby a customer is transitioned to a new rate design, requires the customer to take the action to opt-out of a non-preferred rate. Compulsory rate design transitions have the potential to create a negative customer experience. As we noted in our August 16, 2024 supplement, our proposal to offer an opt-in rate rather than a default rate was informed by customer input. The Company received over 70 public comments in response to our initial proposal. The comments generally opposed the original proposal, with the on-peak pricing and a lack of flexibility inherent in an opt-out rate being two major criticisms. In addition to public feedback, the Company undertook various efforts to better understand industry and customer perspective on this issue.

The Company conducted a brief customer pulse survey. When asking residential customers about their enrollment preference if a new TOU rate was introduced in their area, 63 percent of the 439 respondents from Minnesota indicated they would prefer to stay on their current rate with the option to opt-in to the new rate. Comparatively, 18 percent indicated their preference to be automatically enrolled on the new rate with the option to opt-out, while 19 percent did not have a preference. This feedback highlights the importance our customers place on having control over their energy decisions.

The Company's experience in Colorado shows the quick transition to a default TOU rate has faced significant criticism by customers. As measured in our CO Post-TOU Transition survey, 53 percent of newly enrolled residential customers have a negative opinion of TOU, 20 percent have a positive opinion, and 27 percent are neutral. The negative sentiment is primarily driven by factors like the perceived complexity of the program, financial impacts, and lack of choice in transitioning to the new rate. Many Colorado customers feel forced into a system that they do not understand or agree with, leading to frustration and distrust. The rapid implementation left customers without the necessary tools and support to comprehend the rate and manage their energy usage effectively. A longer timeline could have mitigated these frustrations. Alternately, an opt-in model allows individuals to actively choose to participate after being fully informed about the program's details and potential impacts on their energy usage and costs, enhancing customer understanding and buy-in. By empowering customers to make informed decisions, we foster a sense of control and transparency, which contributes to positive customer sentiment and engagement.

The Minnesota Office of the Attorney General (OAG) agreed with our proposal to implement an optional rate. The OAG "views consumer choice as a valuable market mechanism and new rate offerings increase consumer choice."[1] In addition, the OAG stated that, through an opt-in rate, the Company can test a TOU rate while "minimizing potential consumer harm."[2]

Given the customer feedback, the Company believes that an opt-in approach will lead to a better customer experience. It remains imperative to properly engage and educate customers to encourage adoption of the TOU rate and support the opportunity for customers to manage their energy use in consideration of the TOU rate, and we discuss our customer engagement and education plan in greater detail below. In both opt-in and opt-out enrollment scenarios, education is a pivotal element in achieving successful customer load shifting and behavioral change. The Company's marketing and outreach initiatives will extend beyond merely raising awareness of TOU rates. They will also focus on educating customers about specific strategies and actions to shift their energy consumption to lower cost, non-peak periods. This comprehensive approach aligns with the Company's load shift objectives and facilitates a smooth transition for customers to TOU rates.

B. Phased Implementation Approach

The Department, CUB, and Fresh Energy all advocated for using a deliberate, phased approach for implementing the new rates. We agree that using a more phased approach following phases of opt-in recruitment to implement the rates has benefits that make the implementation of a new rate easier.

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[1] See Page 8 of the OAG's October 15, 2024 Comments.
[2] Ibid.

From a technical implementation approach, a phased implementation is preferable to a mass roll out for many customers at the same time. Transitioning many customers to a new rate at one time is not only complex, but may require a significant amount of time to plan and resources to execute. However, by following a phased, opt-in approach, the work of transitioning customers in our billing system can be spread out and allow for time to ensure that all customers are timely and correctly transitioned. Additionally, our customer service channels, such as our call center, can be better prepared and resourced for the questions that will arise during the transition process.

The Department points to Minnesota Power as an example of a phased approach. Although Minnesota Power's rate transition is significantly different such that its specific plan does not easily translate to the Company's rate transition,[3] the Company agrees that a deliberate phased approach for an opt-in offering makes sense, including for the reasons given above.

We have refined the illustrative timeline for implementation we proposed in our August 16, 2024 Supplement. We include more details about customer recruitment in targeted groups. We propose to transition customers currently on our time-varying rates and then focus on potential high-impact customers. Focusing on high-impact customers was a recommendation from Fresh Energy.[4] We believe this plan will allow us to support the elements of the Department's recommendation that works for an opt-in rate.

The timeline below is similar to the timeline we presented in our August 16, 2024 Supplement, but with some dates moved later allowing for additional time to prepare for the launch.

Illustrative Timeline

Q1 2025 – Commission Order approving rate design
Q2-Q3 2025 – Company to present communications and reporting plan in a Compliance Filing
Q2 2025-Q1 2026 – Stand up billing and technical capabilities
Q3 2025 – Launch Rate Advisor Tool
Q3-Q4 2025 – Communications with residential customers on current TOU rates, including customers on EV tariffs with pricing based on residential TOU rates, to provide notice and preparation for rate change

[3] Most notably, Minnesota Power is transitioning from inverted block rates to TOD rates over multiple steps. In contrast, the Company's is proposing a one-step rate transition.
[4] See Page 2 of Fresh Energy's October 15, 2024 Comments.

Q1 2026 – New TOU rate replaces existing residential TOU rate for pilot participants still on TOU rate, EV customers on time-varying rates, and customers on our time-of-day (TOD) rate.
Q1-Q2 2026 – Test targeted communications approaches to high-impact customers and garner feedback with customers transitioned to newly approved TOU rates
Q3-Q4 2026 – Active marketing begins to seek additional voluntary enrollments for customers with advanced metering infrastructure (AMI) meters.

Given the extended procedural schedule, and that this illustrative timeline relies on certain assumptions that are still subject to change, it is possible that the timelines could shift.

We plan to initially target potential high impact customers to encourage them to enroll in the rate. This was an important issue noted by Fresh Energy.[5] The initial phase of customer education and awareness outreach will prioritize customer segments, for instance:

- Customers demonstrating characteristics indicative of potential success in the new TOU rate, such as electric vehicle owners or users of smart thermostats.
- Customers who are motivated by sustainability and reducing their carbon footprint.
- Customers who are likely to adopt new technologies and are comfortable with digital tools that can help them monitor and manage their energy usage.
- Customers who may experience disproportionate impacts due to the new TOU rate.

The illustrative timeline above strikes a balance between releasing new TOU rates, creating supportive customer tools, ensuring technical capabilities are available, and fully developing marketing and engagement plans that will be designed to incorporate the Commission's decisions in this proceeding. The Company will initially test communications approaches and garner feedback from the TOU customers that were transitioned to the new TOU rate and a targeted group of new customers who are most likely to consider moving onto the rate. The information learned from this phase would be used to inform the next round of customer targeting. Finally, we will move towards mass marketing for customers in a way that shows the benefit and opportunities identified in previous steps and utilizes virtual tools to help customers make choices based on their homes and lifestyle.

[5] See Page 2 of Fresh Energy's October 15, 2024 Comments.

II. BILL PROTECTIONS AND SHADOW BILLING

The Company does not intend to include a bill protection mechanism or offer "shadow billing" when implementing the TOU rate, but instead will provide customers with a rate analysis tool that can provide comparable information prior to deciding to opt-in to the TOU rate.

A. Bill Protections

During the Residential TOU pilot, the Company provided study participants a mechanism to mitigate adverse bill impacts in Year 1 of the two-year pilot, termed "bill protection." If, after the first year of pilot participation, the difference between a customer's standard flat rate and the new TOU pilot rate exceeded a 10 percent increase, the Company provided an on-bill credit for the amount of difference greater than 10 percent. If a customer opted out or moved out of the pilot area during the first year, the customer forewent this protection. This bill protection terminated after the first year.[6] As the pilot study confirmed, participants on average did not experience significant bill impacts while on TOU rates without the bill protection mechanism.

The Company was able to develop a script to calculate bill protection credits outside the billing system because of the limited pilot scope. Scaling this process in the same way to a larger group of customers is not feasible. It would be significantly more complicated as customers would be transitioning from not just one rate, but several to the TOU rate, and the number of customers would be materially increasing in each Phase of the plan.

In addition to the complexity and cost of implementing a bill protection mechanism, providing bill protections outside of a pilot study could hamper customers' behavioral changes and lessen their engagement with the rate. Encouraging behavioral changes and engagement with the rate is ultimately needed for customers to be successful on the program and drive system change. In addition, to the extent a participant is unable to experience savings on the rate, they could opt out at any time. With this offramp available to customers, and the pilot study that was already undertaken, we do not agree a bill protection mechanism is a sufficiently worthwhile feature to implement.

The Company plans to offer digital tools to customers, including a rate analysis tool. Through the planned tools, customers will be empowered with information to help them understand, anticipate, and plan for outcomes under new TOU rates. By being

[6] LIHEAP recipients received a monthly form of the bill protection mechanism.

informed about potential bill impacts before enrolling in the rates, customers will have the tools to understand the potential impact of TOU rates for them specifically.

Beyond the costs and lack of value for implementing a bill protection mechanism, it will also lower the revenues recovered from participants. As the TOU rate is designed to be revenue neutral, in order to offer bill protections, the Company would need to recover the lost revenue due to providing bill protection credits to customers in another way. This would essentially increase the cost of implementing the rate and any increase in costs would impact the net benefits to customers from implementing the rate. In short, the Company does not support a bill protection mechanism at this stage because it is expensive, redundant, and unnecessary.

1. OAG's Bill Protection Recommendation

The Company is especially concerned about the OAG's recommendation for a bill protection mechanism. The OAG proposes a bill protection mechanism where during the first year of participation, if a customer receives a bill that is 10 percent or more than their previous month, the increase would be capped at a 10 percent increase.[7] If the increase continued for the next month, the increase would again be capped at 10 percent. The triggering of the bill protection would also come with an on-bill notice and information about how to be effective in responding to the rate.

There are several reasons that the Company does not support this proposal. For example, by offering bill protections based on a month-to-month comparison as proposed by the OAG, the proposal separates the bill protection mechanism from the TOU rate impacts themselves. The proposal assumes a bill increase of 10 percent or more would be only the result of the TOU rate. However, a bill increase of 10 percent or more could be caused by changes in seasonal weather, changes in family routines, the addition of new electric appliances or other energy consuming devices, or an increase in at-home time. Any of these causes could trigger the bill protection mechanism advocated for by OAG and would run counter to the goal of the bill protection mechanism, which is to protect customers from experiencing large bill increases due to the TOU rate.

Rather than artificially capping bills, the Company proposes to encourage and empower customers to understand how their consumption behavior, in conjunction with the TOU rate, affects their bills. Again, customers who are unable to adapt to TOU rates have the option to return to flat rates at any time. The OAG's proposal is unworkable and unnecessary.

[7] See Pages 10 and 11 of the OAG's October 15, 2024 Comments.

B. Shadow Billing

We interpret "shadow billing" to mean having a billing system capable of calculating and producing more than one bill to an individual customer. With shadow billing, a customer would receive a bill with two different amounts. The first would be for the rate they are enrolled in, for example the new TOU rate. This would be the amount that they are billed for the month. The second could be a different rate option, such as "flat" residential rates, showing the amount they would have to pay under the other option. In this scenario, a customer can react to a higher bill and opt-out of the rate that is unfavorable.

CUB and Fresh Energy advocate for implementing shadow billing capabilities as a part of implementing the residential TOU rate. Like the reasoning discussed for "bill protections," the Company also opposes shadow billing customers because it is costly, redundant, and unnecessary.

The primary complication to implementing a shadow billing system is that our current billing system does not have the capability of calculating bills under multiple rate options for customers. Developing an extensive new platform would considerably increase the time, resources, and cost necessary to implement the overall rate.

If required to evaluate the feasibility of shadow billing, we would go through a series of exercises to define the goals and objectives of the project, solicit input from various stakeholders and then create a robust requirements document. We would reach out to potential vendors who can offer these services and go through the procurement and contracting process. Once on board, the project would involve working with the contractor to design and develop the tool and set up processes to integrate with our systems. This would be a multiyear, multi-million-dollar initiative, which would delay our TOU launch. Additionally, using a tool built outside our billing system requires a considerable amount of data sharing with a vendor as well as continual efforts and testing to ensure the tool is kept current with the billing system. We estimate it would take at least two years and cost a minimum of $2 to 3 million. All of that is dependent on the requirements of the tool and could significantly increase if more functionality is required. After all of that effort and cost, a shadow billing tool would still fail to include sufficient information to support behavior changes that may be needed for customers to be successful on a TOU rate.

The benefits of a shadow billing system, keeping customers informed of what their bill may be under various rate options, can be accomplished by our proposed rate analysis tool at a lower cost. A rate analysis tool is a proactive approach to allowing customers to compare their personal rate within their home, allowing them to make an informed decision regarding whether to opt-in to the TOU rate and how they may take advantage of the off-peak savings. The rate comparison can demonstrate how customers fare on different rate structures and help customers understand whether they would benefit from enrolling in program through hypothetical enrollment in TOU. The expectation is that this rate analysis tool will be available in conjunction with the start of general TOU rate availability.

A primary reason both Fresh Energy and CUB advocated for exploring a shadow billing proposal over our planned rate analysis tool is that the rate analysis tool would "be a larger customer lift than an on-bill shadow billing tool".[8] While a shadow billing tool would not require any action from a customer, we disagree that engaging with our proposed rate advisor tool is necessarily a much larger lift and it comes with added engagement benefits. While exact functionality is still being developed, the rate advisor tool will not only provide a comparison of a customer's projected bill on the TOU versus their current rate, which can be viewed on-demand through digital engagement channels, it will follow customers on their journey under the new rate, providing guidance with insights such as bill forecasts and comparisons to other rates to empower customers to maximize the potential savings of the time of use rate over time. A rate advisor tool will help customers make informed decisions about the future rather than providing a "shadow bill" that looks backwards at how electric costs (regardless of analysis on weather or other extraneous factors) may have gone under two different rates. A proactive analysis versus reactive action will help encourage customers in a way that will benefit TOU in the long run and likely encourage customers to share their experiences with their neighbors.

We appreciate the comments provided by Uplight, who has expertise in customer engagement. Uplight supports the Company's proposed tools, such as a rate advisor tool and mobile app. According to Uplight the proposed tools will "equip customers with the information they need to select and succeed on the Residential TOU rate" and will "markedly increase customer confidence" in our proposed TOU rates.[9]

Bill impact is just one critical piece of information for customers. Our proposal is that we invest in a robust, integrated communication plan rather than an expensive shadow billing tool. Simply showing customers an example bill, without context, is likely to lead to diminished benefits in terms of long-term behavioral change. We plan to layer the communications – explaining the concept, behaviors to change, and then painting a picture of how they can be successful. The rate advisor tool can be layered

[8] See Pages 5 and 6 of Fresh Energy's October 15, 2024 Comments.
[9] See Page 3 of Uplight's October 15, 2024 Comments.

into that communication and education strategy showing customers how the information can help them make the choice to sign up for a TOU rate and engage in behavior changes to be successful on the TOU rate. On-going communications will remind customers to continue the behavior changes and check their usage through online tools. Ultimately, a rate analysis tool coupled with a robust education plan can be effective in keeping customers informed and would be a better use of resources than shadow billing.

III. RATE DESIGN

A. TOU Rate Periods

Multiple parties provided alternative options for the timeframe that should be used for the on-peak period of the TOU rate. In this section we respond to the recommendations from the Department, the Minnesota Solar Energy Industries Association (MnSEIA), and Fresh Energy in their October 15, 2024 Comments. We continue to support our proposal to set the on-peak period from 7 p.m. to 10 p.m. on non-holiday weekdays.

Before we address the alternative proposals from the parties, we note that the energy rates proposed for the TOU rates were set along with the determination of the time periods for the rate. As such, deviating from the proposed TOU rate periods would also likely require recalculating the pricing of the energy rates. This is an additional consideration when assessing the proper time period to use for the TOU rates.

The Department recommends that the on-peak period should be set from 4 p.m. to 7 p.m. on non-holiday weekdays.[10] The Department states that this represents the highest cost period to provide service based on their assessment of Locational Marginal Prices (LMPs). An important distinction is that LMP prices are a representation of variable market energy costs related to the Company's fuel clause recovery, rather than the fixed costs of generation, transmission, and distribution assets included in the base rates being discussed here. The Company's proposed on-peak periods were determined by looking at the hourly loads net of renewables for average weekday, non-holiday hours. Our analysis identified peak loads occurring in the 7 p.m. to 10 p.m. timeframe, and then our TOU rate design assigns the highest base costs to those peak hours of the day.

The Company also notes that LMPs, as advocated for by the Department, look back at previous market energy costs, which may not be the expected market conditions in

[10] See Page 4 of the Department's October 15, 2024 Comments.

the future. It is possible that, as more solar production comes online in the future, the highest cost period for LMPs is pushed later into the evening beyond the high solar production hours.

As to the off-peak period, the Department states that they would be comfortable starting the off-peak period at 11 p.m. rather than 12 a.m. like the Company has proposed. The Company still believes our proposed off-peak period is reasonable. A starting time of 12 a.m. provides an appropriate buffer between our proposed on-peak period and the off-peak period. It also ensures that system usage will be sufficiently low and avoid the potential for a snap-back peak at the start of the off-peak period.

Fresh Energy recommends using an on-peak period from 6 p.m. to 9 p.m. on non-holiday weekdays.[11] Their analysis is based on an assessment of MISO modeling throughout the year as well as an analysis of the Company's future annual energy market purchases completed by the Clean Energy Organizations as a part of our most recent Integrated Resources Planning (IRP) filing. While Fresh Energy's recommendation is within the range of potential high market exposure time periods, we prefer our initial proposal. The analysis supporting our on-peak proposal primarily focuses on the summer period, specifically July, when our system peak is typically highest. By focusing on this time period, we ensure that we are addressing our highest system cost periods of the year, which have an outsized impact on the overall cost to serve our customers. Our proposal also aligns with future load forecasting information which shows our peak period shifting later into the evening as more renewables, such as solar, are added to our system.

MnSEIA had a similar recommendation to Fresh Energy, stating that the data supports starting the on-peak period at 6 p.m. and ending at 9 p.m. Their analysis was based on similar data that we used for our analysis, load forecast information provided by the Company in Attachment A of our initial December 22, 2023 Petition in this docket. Despite stating that the data supports a 6 p.m. to 9 p.m. on-peak period, MnSEIA does state that the proposal should be rejected because the pilot data has not been thoroughly vetted.

In sum, the Company continues to support our initial proposal to set the on-peak period from 7 p.m. to 10 p.m. and its off-peak start time of 12 a.m. These proposals rely on forward-looking data to capture market and load fluctuations and are therefore more likely to lead to the energy usage behavioral changes the TOU rate is intended to motivate.

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[11] See Pages 1-2 of Fresh Energy's October 15, 2024 Comments.

B. Net Metering Tariff

MnSEIA recommended that the Commission not approve the proposed residential TOU rates, focusing on the Company's proposed changes to net metering tariffs and how the net metering tariffs interact with the proposed residential TOU rates. Here, we reply to their concerns about the net metering rates and provide additional information supporting our proposal.

MnSEIA claims that the Company's proposal for net metering rates does not comply with Minnesota Statute when paired with residential TOU rates. Minn. Stat. § 216B.164, Subd. 3(d), which establishes the rules for cogeneration and small power production, states that:

> *Notwithstanding any provision in this chapter to the contrary, a qualifying facility having less than 40-kilowatt capacity may elect that the compensation for net input by the qualifying facility into the utility system shall be at the average retail utility energy rate. "Average retail utility energy rate" is defined as the average of the retail energy rates, exclusive of special rates based on income, age, or energy conservation, according to the applicable rate schedule of the utility for sales to that class of customer.*

In compliance with this statute, the Company has proposed a net metering tariff which compensates residential customers at the average retail utility energy rate. MnSEIA states that a time-varying average retail utility energy rate should be created, so that the rate customers are compensated at different rates based on when they generate usage. This proposal does not align with the practical application of the net metering tariff or the statute.

First, as the Company previously noted, the average retail rate is currently higher than the Company's proposed TOU mid-period and off-period rates. This means that excess energy for the 21 hours between 10:00 p.m. and 7:00 p.m. is compensated at a higher rate than charges billed under the TOU rates. For the hours of 7:00 p.m. to 10:00 p.m., the expected excess energy from net metered solar generation would likely not be significant. Table 1 below shows the pattern of solar production from the Company's February 1, 2024 Integrated Resource Plan. We believe that our proposal for net metering compensation at the average retail utility energy rate is a reasonable, practical solution that fairly compensates eligible Residential net metering customers without introducing additional unneeded complexity.

Table 1
System Weekday Solar Production – July Forecasts
Percentile of Maximum Solar Production

Hr Ending	TOU	2025	2026	2027	2028	2029	2030
1	Off	0.000	0.000	0.000	0.000	0.000	0.000
2	Off	0.000	0.000	0.000	0.000	0.000	0.000
3	Off	0.000	0.000	0.000	0.000	0.000	0.000
4	Off	0.000	0.000	0.000	0.000	0.000	0.000
5	Off	0.000	0.000	0.000	0.000	0.000	0.000
6	Off	0.035	0.027	0.025	0.025	0.025	0.030
7	Mid	0.256	0.261	0.246	0.239	0.260	0.280
8	Mid	0.519	0.557	0.529	0.519	0.566	0.588
9	Mid	0.749	0.753	0.710	0.738	0.793	0.801
10	Mid	0.840	0.834	0.789	0.850	0.894	0.871
11	Mid	0.932	0.908	0.861	0.943	0.964	0.940
12	Mid	0.977	0.960	0.938	0.989	1.000	0.983
13	Mid	1.000	1.000	0.997	0.976	0.995	1.000
14	Mid	0.978	0.992	0.990	1.000	0.998	0.991
15	Mid	0.968	0.997	1.000	0.955	0.966	0.981
16	Mid	0.975	0.998	0.987	0.960	0.935	0.960
17	Mid	0.934	0.983	0.962	0.930	0.889	0.911
18	Mid	0.860	0.914	0.905	0.856	0.819	0.842
19	Mid	0.717	0.747	0.737	0.728	0.689	0.715
20	On	0.416	0.418	0.415	0.398	0.377	0.414
21	On	0.175	0.154	0.160	0.154	0.148	0.162
22	On	0.000	0.000	0.000	0.000	0.000	0.000
23	Mid	0.000	0.000	0.000	0.000	0.000	0.000
24	Mid	0.000	0.000	0.000	0.000	0.000	0.000

In addition, the creation of different average retail utility energy rates for different TOU time periods would potentially deviate from Minn. Stat. § 216B.164, Subd. 3(d), which specifically defines "average retail utility energy rate" as "the average of the retail energy rates . . . according to the applicable rate schedule of the utility for sales to that class of customer." It is calculated by dividing the total retail residential revenues by the total retail revenue sales. The revenue that goes into the calculation includes revenues that are not time-varying, such as the monthly customer charge. Converting these non-time-varying revenues into an amount that could be used to calculate time-varying average retail utility energy rates would be complicated and would require making assumptions about how to divide the revenues.

Notably, this process of calculating the average retail utility energy rate is well-established as the Company has been using it since establishing our net metering tariffs. The process of calculating these rates has been well-vetted by parties and has been authorized by the Commission. Our proposed rate follows Minnesota Statute, and there has not been any proposal for how to deviate from the established process in a way that would similarly comply.

In addition, MnSEIA claims that our proposed tariffs violate Minnesota law because they do not "promote the safe and reliable parallel operation of on-site distributed generation resources" nor do they "promote the use of distributed resources in order to provide electric system benefits during periods of capacity constraints."[12] MnSEIA does not provide further detail to support how the assertion that the rates do not promote the adoption of distributed resources. But even beyond that, the purpose of net metering rates is to provide appropriate compensation to customers who provide net generation to grid. Our proposed net metering rate achieves that purpose in compliance with Minnesota Statute.

MnSEIA claims that the proposed net metering rates when paired with a TOU rate is disconnected from the mechanics by which electricity would be sold. The Company disagrees with this claim. The process of net metering nets on-site generation with usage in each TOU period.

Finally, MnSEIA asks the Commission to require the Company to provide updated projections of the costs and benefits of the tariffs to allow for an evaluation of the net metering tariffs. Unfortunately, forecasted costs and benefits of the net metering rate are not available. The net metering rates are based on actual sales and revenue data and is a backward-looking calculation rather than a forward looking one. The Company would be happy to provide greater details behind how the net metering rates are calculated if the Commission would find that useful.

C. Space Heating Rates

Based on the comments filed by parties in this docket, there appears to be near unanimous support for approving the space heating rates as proposed. We appreciate that parties are supportive of the proposal and are encouraged by the enthusiasm expressed by parties. We also continue to support the space heating rates as proposed.

We acknowledge that the American Council for an Energy-Efficient Economy (ACEEE), in their May 16, 2024 comments in this docket, expressed an opinion that the space heating rates should be limited to only customers whose primary source of heating was heat pumps. As we stated in our August 16, 2024 Supplement, we do not support this proposal, primarily because a space heating rate has been available to

[12] See Page 2 of MnSEIA's October 15, 2024 comments.

Minnesota customers for decades and adding a new restriction could cause customers with electric resistance heating to become ineligible, driving up their heating costs with no obvious benefit. An additional reason is that a restriction such as the one proposed by ACEEE would be difficult to implement as the Company has no way of knowing which space-heating technology customers are using and does not currently require customers to provide that information.

CUB agrees with our proposal and not placing equipment type restrictions on the space heating rate. They state that the adoption of energy efficient space heating technology is not the only benefit of a lower space heating rate, as space heating customers "do not materially contribute to incremental base rate costs" for a summer peaking utility like the Company.[13]

We understand the enthusiasm and appreciate the overall support for the proposed space heating rates. These rates can save customers money and potentially encourage the adoption of more electric space heating options. Per an analysis completed by the Center for Energy and Environment (CEE) the proposed space heating rates will save the average customer with dual fuel or all-electric HVAC systems between 12 and 24 percent over the standard residential one-period rate.[14] Further, their analysis shows that the proposed space heating rates can make "dual fuel and all-electric HVAC systems cost-competitive with standard furnace and air conditioner systems."[15]

Based on the savings that our proposed space heating rates have the potential to generate, we understand parties wanting us to start the space heating rates as soon as possible, even before the regular TOU rate if that rate is delayed. However, starting the space heating rates ahead of the corresponding TOU rates would create a revenue imbalance that would lead to the Company not collecting its approved revenue. The TOU and space heating rates are designed together to be revenue neutral. Revenues lost due to the lower space heating rates need to be made up from the TOU rate. If the space heating rate is started early, the Company's revenue would be lower and would not have the TOU rates to offset the decrease. As a result, the Company proposes that the timing of launching the TOU and space heating rates should be kept together to ensure the Company can properly recovery its revenues through the new rates.

[13] See Pages 10-11 of their comments.
[14] See Page 7 of CEE's October 15, 2024 Comments.
[15] See Page 19 of CEE's October 15, 2024 Comments.

IV. CUSTOMER EDUCATION AND ENGAGEMENT PLAN

The Company is committed to having a robust education and engagement plan that can complement our new TOU rate, drive interest in rate enrollment, and will inform customers of how to be effective on the new rate. Our marketing plan will consider customer targeting, messaging, customer decision-making support, and ongoing engagement efforts. We discussed some details about our plan in our August 16, 2024 Supplement, and will prepare the launch plan once the final rate design is approved by the Commission. Fresh Energy called for a plan targeted at traditionally underrepresented customers. We anticipate the plan will incorporate and discuss specific provisions for traditionally underrepresented communities and those uniquely affected by the TOU rate plan.

To provide interested parties and the Commission an opportunity to provide feedback, we will share engagement insights and outreach refinements in future reporting. We discuss this compliance filing and other reporting issues later in this Reply.

An important aspect of keeping customers informed will be having call center staff that are trained to respond to issues that may arise related to the rates. This point was specifically highlighted by CEE with a recommendation that the Company establish "clear processes, materials, and messaging for call center staff".[16] We appreciate that recommendation from CEE and are committed to making sure our call center staff has all the tools and information to be able to help customers understand their rate options. The Company regularly prepares materials that call center employees can review for any potential issues that may arise. Due to the detailed nature of this rate, we will ensure that those materials are robust and cover all pertinent details of the rate and the process of enrolling in the rate. We will also regular review the available information to address specific questions that may arise and will continue to add additional information to the materials to keep them up to date. We also anticipate the call center staff having access to a version of the rate analysis tool that customers can use to compare their rate options. By having access to that tool, our call center staff will be better able to walk a customer through the process of using that tool so they can be better informed about the impact that the TOU rate may have on their bill.

CEE was also interested in how we will engage customers and inform them of their space heating options. The Company intends to include the space heating option alongside such programs as water heating and heat pump rebates. We offer information relating to rebate eligibility on our website, rebate applications, and other

[16] See Page 21 of CEE's October 15, 2024 Comments.

promotional materials. We also regularly provide contractor training on topics including, but not limited to, system efficiency, rebate eligibility, proper sizing, and switchover temperatures. It is our intention to include information about the space heating rates on rebate application forms and in our ongoing communication with our trade allies and a part of our effort to explore methods to make more of this information available to customers and contractors.

GridX recommends that the Commission authorize cost recovery for the Company to pursue and fund solutions that will enable personal rate education. If the Commission believes this is important and authorizes cost recovery, we are open to exploring additional solutions that will enhance a personalized rate education for customers.

V. ENABLING TECHNOLOGIES AND LOAD FLEXIBILITY DEVICES

Fresh Energy has several recommendations related to enabling technologies and load flexibility devices, including pairing the TOU rate with enabling technologies that address large residential loads, evaluating more rebate options for load flexibility devices, and expanding opportunities for energy-management technology. The Company agrees with Fresh Energy that customers with other enabling technologies will be best situated for TOU participation.

We have several programs available for customers today that offer these services as provided in our Energy Conservation and Optimization plan.[17] Specifically, our Residential Demand Response program offers incentives for smart thermostat or water heater control. Additionally, we have programs such as Energy Squad that begin customer conversations to reduce load and encourage the purchase of a smart thermostat that we can help install onsite.

In 2023, there were over 2,500 low-income customers participating in this offering and nearly 200 smart thermostats were installed. When installed and registered for our Residential Demand Response program, typically the thermostat is free to customers. As part of our ongoing planning, the Company continues to review further opportunities to provide new technologies and income-qualified rebates, however, we note that we also review these programs under a cost analysis and extending “free” equipment can significantly increase costs. Finally, we note that we also have an installation rebate and actively work towards weatherization through our extensive income qualified portfolio.

[17] Docket No. E,G002/CIP-23-92

VI. COMPLIANCE FILINGS AND REPORTING REQUIREMENTS

The Department recommends that the Company file a compliance filing with an implementation plan and proposed tariff changes within 90 days of the Commission's Order.[18] The Company agrees that a compliance filing after the Commission Order would be reasonable. We would anticipate filing plans for how the rate would be implemented, the timing of implementation, and the tariff pages based on what is approved by the Commission. We also anticipate including our customer education and engagement plan as discussed above.

CUB commented that a customer segmentation study, similar to a Minnesota Power study, would be useful in developing future rate designs. This topic was recently addressed by the Commission in the docket addressing our Automatic Bill Credit pilot proposal. The Commission verbally approved that pilot proposal and authorized the Executive Secretary to issue a Notice of Comment Period in Docket No. E002/CI-24-115 on whether Xcel Energy should perform a study evaluating the contribution to Minnesota systems costs caused by residential customers with different usage profiles. We do not believe any action is required in this docket related to CUB's recommendation.

Both the OAG and Fresh Energy provided a list of many reporting requirement recommendations, many of which we do not oppose. However, there are some items that may not be relevant to the discussion or would be difficult to provide. We provide a detailed response to each recommendation below. If the Commission approves a set of routine reporting requirements, we recommend that the reporting be annual. This aligns with the recommendation of the OAG, who recommended reporting after 12 months and 24 months, as well as Fresh Energy, who recommended having a transition report after 12 months. Considering the timeframe for all phases of our planned implementation, and in the interest of administrative efficiency, we recommend reevaluating whether all ongoing reporting requirements remain valuable after the initial phases are completed.

A. OAG Recommendations

In response to the OAG's proposed reporting requirements, we are generally supportive of providing most of the items they recommend.[19] There are a couple of items that we do not currently have the internal capabilities to provide. These items, such as customer bill impacts, would likely require us to work with an outside consultant. Working with an outside consultant would be possible but would come at

[18] See Page 13 of the Department's October 15, 2024 Comments.
[19] See Page 13 of the OAG's October 15, 2024 Comments

significant cost that would add to the overall cost of operating the rate, as we are not currently planning to engage an outside consultant to assess this rate. There are additional items where we have a portion of the information, but do not currently have it available at the level of detail proposed by the OAG. Table 2 below provides the Company's position on each reporting requirement proposed by the OAG.

Table 2
OAG Proposed Reporting Requirements

Item	Company Position
Participation metrics, including the number of customers who have opted into the new rate and opt out of the new rate, overall and by customer segment	Company Supports
Customer bill impacts for the full population and by customer segment, including minimum, maximum, and average bill increases, and charts showing the full distribution of bill impacts annually and by season	Company does not currently have internal capabilities to do this. When this information was provided as a part of pilot, it was completed by an outside consultant.
The number of customers who received bill protection, overall and by customer segment, as well as the number of customers who opted out of the TOU rate after receiving bill protection	Company does not support as we do not support including bill protections as part of rate implementation. However, if bill protections are required, we are not opposed to this reporting requirement.
Number of customers on the TOU rate who have had their service disconnected	Company Supports
Minimum, maximum, and average household peak impact overall and by customer segment, annually, and by season	Company Supports
System coincident peak impact of TOU customers annually and by season	Company does not currently have internal capabilities to do this. When this information was provided as a part of pilot it was completed by an outside consultant.
Load shifting based on historical customer usage, overall and by customer segment, annually and by season	Company Supports, although we do not currently have this information available by customer segment
Customer experience, including satisfaction, preferences, attitudes, acceptance, and comprehension, including awareness of the specific on-peak, mid-peak, and off-peak periods.	Company Supports
Explanation of how the reported peak reductions will factor into future resource planning and distribution system planning, including an estimate of costs avoided thanks to peak reductions.	The Company is not opposed to discussing this topic, but we believe discussions of resource and distribution system planning would better be addressed in our Integrated Resource Planning and/or Integrated Distribution Planning dockets. We however acknowledge that modeling avoided system costs due to peak reductions is complex and not something we can do with certainty at this time.

If the Commission requires the Company to file a pre-launch Compliance Filing, the Company is not opposed to providing the information recommended by the OAG and agreed to by the Company as set forth above, to the extent it is available at that time.

B. Fresh Energy Recommendations

Fresh Energy recommended a list of reporting requirements for the TOU rate in their May 17, 2024 Comments in this docket and renewed their reporting requirement recommendation in their October 15, 2024 Comments.[20] Please note that the items 4a through 4h in Fresh Energy's list are specifically related to a transition to a default TOU rate. The Company is not recommending transitioning to a default rate in this proposal, but some of these are reporting requirements that we can provide even in a transition to an opt-in rate and we support these. In Table 3 below we provide our position on each of the items recommended by Fresh Energy.

Table 3
Fresh Energy Proposed Reporting Requirements

Item	Company Position
1a	**Company supports**
1b	**Company supports**
1c	**Company supports**
1d	**Company supports**
1e	Average, minimum, and maximum bill impacts could be provided. However, minimum and maximum would not reflect the true experience of most customers and would rather focus on outlier customers with bill experiences that may not apply to any other customers. We would recommend reporting on customers at a certain percentile (e.g., 90th percentile) rather than the greatest outliers.
1f	**Company supports**
1g	**Company supports**
1h	**Company supports**
1i	**Company supports**
1j	**Company supports**
1k	**Company supports**
1l	**Company supports, although assessing the load shifts of all non-participants may be burdensome.**
2a	Company does not maintain information about the number of customers with enabling technologies that can be linked to participants in a future rate option. Gathering this information would require self-reporting surveys which may come at a high cost and would not necessarily lead to reliable results.

[20] See Pages 8-10 of Fresh Energy's October 15, 2024 Comments.

Item	Company Position
2b	**Company supports**
3a	**Company supports**
3b	**Company supports**
3c	**Company supports**
4a	**Company supports**
4b	Company does not believe a CPP component is appropriate at this stage for a residential TOU rate or as a stand-alone demand response program and believes this is out of the scope of this proceeding.
4c	**Company supports**
4d	Company does not support bill protection payments as a part of implementing TOU rates. Because the pilot phase has concluded and because the Company has proposed voluntary enrollment, bill protection is not an appropriate feature of the rate implementation.
4e	**Company supports**
4f	**Company supports**
4g	Discussions of rebates for load flexibility devices and how they can be provided to under-resourced customers are better served in our ECO filings as it would involve demand-side management (DSM) program spending.
4h	Discussions of expanding programs around energy-management technology are better served in our ECO filings as it would involve DSM program spending.

If the Commission requires the Company to file a pre-launch Compliance Filing, the Company is not opposed to providing the information recommended by Fresh Energy and agreed to by the Company as set forth above.

CONCLUSION

We appreciate the opportunity to provide this Reply responding to the October 15, 2024 Comments from parties addressing our revised proposal to implement a Residential TOU rate.

Dated: November 14, 2024

Northern States Power Company

CERTIFICATE OF SERVICE

I, Christine Schwartz, 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-23-524

Dated this 14th day of November 2024

/s/
____
Christine Schwartz
Regulatory Administrator

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