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April 22, 2021

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

Re: *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of 2021 True-Up Mechanisms*
MPUC Docket No. E-002/M-20-743

In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota
MPUC Docket Number: E-002/GR-20-723

Dear Mr. Seuffert:

The Office of the Attorney General, Residential Utilities Division files this letter in response to the Minnesota Public Utility Commission's ("Commission") April 2, 2021 Notice of Comment Period on the March 3, 2021 letter from Northern States Power Company d/b/a Xcel Energy ("Xcel" or "Company"). Xcel's letter explains that the Company's proposed test-year revenues and interim rates in its recent rate case were overstated by approximately \$43 million, and it provided corrected numbers. The Company further explained that its error did not impact any of the elements of the rate case stay-out proposal that the Commission approved.¹ The Commission requested comments on whether Xcel's correction materially changes the Commission's rationale for approving the Company's 2021 True-up Proposal ("Stay Out"), and whether the Commission should reconsider its approval of the Stay Out and require Xcel to proceed with a rate case.

Xcel's error is disappointing. The Commission and the parties should have had accurate information to evaluate and compare the Company's rate case filing with its Stay Out proposal. But while this did not happen, Xcel's correction should not change the Commission's ultimate conclusion; the Stay Out is the best option for ratepayers, even after accounting for Xcel's correction. In fact, updated information from Xcel shows that the Commission's decision to approve the Stay Out benefits ratepayers more than the Company previously projected. For these reasons, the Commission should not reconsider its decision to approve the Stay Out.

¹ *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of 2021 True-Up Mechanisms*, Docket No. E-002/M-20-743, Letter re: Stay-Out at 1 Mar. 3, 2021) ("Xcel Letter").

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There are at least two reasons that the Commission should not reconsider its decision to approve the Stay Out. First, even accounting for Xcel's correction, the Stay Out remains a much better option for ratepayers than proceeding with a full rate case. While Xcel's correction makes a rate case look somewhat "less bad" than it previously appeared, it is still much worse than the Stay Out. The Company's correction still shows a requested 2021 rate increase of \$191.5 million *more* than the amount it previously anticipated from the Stay Out.² Put differently, even with Xcel's correction, the Stay-Out projection represents a 52.8 percent reduction to the Company's proposed rate increase, and a 35.6 percent reduction to its proposed interim rates.³ And, unlike a rate case, any cost increase from the Stay Out will not be felt by ratepayers until a surcharge (or refund) is implemented in 2022. This provides rate stability during 2021, a time when the State is working to recover from the economic fallout of the COVID-19 pandemic. In a rate case, any increase in interim rates would impact ratepayers right away.

Some parties may argue that comparing Xcel's requested rate increase to the projected impact of the Stay Out overstates the benefits of the Stay Out, since Xcel would likely not receive its entire rate case request. Parties could argue, for instance, that the rate case would be better than the Stay Out if Xcel received 47 percent or less of its requested increase.⁴ This thinking could lead to the conclusion that Xcel's correction makes the rate case a more preferable option, because it reduces the difference between Xcel's requested rate increase and its projected surcharge from the Stay Out. Those parties would be mistaken.

The problem with comparing Xcel's rate case request to the projected Stay Out is that a rate case would not be better for ratepayers simply if the Commission reduced Xcel's request by a certain amount. Rather, a rate case would only result in lower costs for ratepayers if the Commission took the truly dramatic action of rejecting *all* of Xcel's claimed cost increases. This is true for both Xcel's previous projection and its corrected amounts. The reason for this is that the anticipated cost of the Stay Out (\$171.1 million) was also included as a line item of Xcel's rate case.⁵ Since the costs of the Stay Out will reflect actual spending, any adjustments in the rate case for higher actual sales, lower capital spending, or lower property taxes in 2021 would also reduce the ultimate cost of the Stay Out. As a result, the outcome of a rate case would only be lower than the Stay Out if the Commission rejected every proposed cost increase Xcel claimed that is not a component of the Stay Out—and *then* found additional reductions.⁶ While this is possible, it is far from guaranteed. And it was reasonable for the Commission to take the cautious approach and approve the Stay Out during a year when the public is trying to recover from the economic harm of the pandemic. Xcel's correction does not change this fundamental benefit for ratepayers.

Moreover, even if a hypothetical rate case resulted in slightly lower rates than the Stay Out—however unlikely this is—ratepayers could still be worse off with a rate case. This is because the Commission accepted Xcel's offer of additional ratepayer protections as a condition of approving the Stay Out. These additional protections included tens of millions of dollars in withdrawn recovery requests and assistance for struggling ratepayers, an extension of its 2020

² *Id.* at Attach. A.

³ *See id.*

⁴ *See id.* at 2 (projecting an adjusted revenue deficiency of approximately \$362.5 million).

⁵ *See id.* at Attach. A.

⁶ *See id.*

sales true-up for the Demand Class, and protections against over-earning. As the Commission explained, these protections “reasonably shift some of the risk to the Company, reduce costs for ratepayers, mitigate the impacts to the Demand class, and provide economic protections for those most in need during the pandemic.”⁷ These are significant benefits for ratepayers that would be lost if the Commission abandoned the Stay Out and proceeded with a rate case. Xcel’s correction does not change the fundamental balance between the Stay Out and a rate case; the Stay Out is still a far better option for ratepayers.

Second, Xcel’s most recent data shows that the Stay Out will likely be even better for ratepayers than the Company projected when the Commission approved it. The Xcel Large Industrials (“XLI”) have again argued that the Stay Out should be rejected because the final outcome of Xcel’s true ups will likely be worse for ratepayers than the Company claimed.⁸ Xcel’s current data, however, shows that the opposite result is more likely; virtually all ratepayers will likely do much better under the Stay Out than Xcel previously projected.

Xcel’s most recent data shows that ratepayers will likely receive higher refunds or lower surcharges than the company previously projected. When Xcel initially proposed its Stay Out, the Company projected that its ratepayers would be surcharged more than \$171 million from its sales true up, and that they would have no surcharge or refund for its property tax or capital true-ups.⁹ The OAG recently asked that Xcel update these projections, based on the consumption that has already occurred in 2021. Xcel’s responses show that its previous projections were worse for ratepayers than what it now expects.

Xcel’s updated projections show that the projected surcharge from its sales true up has been substantially reduced to approximately \$135 million, or a decrease of nearly \$36 million.¹⁰ In addition, the benefits of this update are flowing to all three of Xcel’s largest customer classes, with the largest dollar change benefiting the Demand class.¹¹ On top of this benefit from higher sales, the Company’s update shows that it now projects a customer refund of approximately \$6.6 million from its property-tax true-up, and no change to its capital true-up. This means that the total amount Xcel currently projects to surcharge customers under the Stay Out has declined by more than \$42 million, or nearly 25 percent.

It is certain that Xcel’s projections will continue to change as more data is received about its 2021 sales. At this time, however, there is no evidence to suggest that ratepayers will be substantially worse off than Xcel projected when the Commission approved the Stay Out. Rather, it appears that the Commission’s decision to approve the Stay Out will be even more beneficial

⁷ Docket No. E-002/M-20-743, Order Approving True-Ups with Modifications and Requiring Xcel to Withdraw its Notice of Change in Rates and Interim Rate Petition at 13 (Apr. 2, 2021).

⁸ Docket No. E-002/M-20-743, XLI Letter at 2 (Mar. 8, 2021).

⁹ See Docket No. E-002/M-20-743, Xcel Response to OAG Information Request 006 (attached here as Exhibit A).

¹⁰ *Id.*

¹¹ See *id.*

Mr. Will Seuffert
Executive Secretary
April 22, 2020
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than the parties or the Commission realized at the time. Xcel's correction does not change this fact, and the Commission should not alter its previous order to approve the Stay Out.

Sincerely,

/s/ **Ian Dobson**

IAN DOBSON

Manager, Residential Utilities Division
Assistant Attorney General

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EXHIBIT A

- Not Public Document – Not For Public Disclosure
- Public Document – Not Public Data Has Been Excised
- Public Document

Xcel Energy Information Request No. 6
 Docket No.: E002/M-20-743 **Corrected**
 Response To: Office of the Attorney General
 Requestor: Ian Dobson
 Date Received: April 13, 2021

Question:

Please identify the following for each customer class served by Xcel:

The amount Xcel projected as a surcharge or refund at the time the Commission decided to approve the rate case “stay-out”; and

The amount that Xcel currently projects as a surcharge or refund, based on the consumption that has occurred in 2021.

Response:

Sales Forecast True-Up

Please refer to the below table. Projected figures were filed in the Company’s October 30, 2020 Reply Comments in Docket Nos. E002/M-20-743; E,G999/CI-20-492; E,G002/M-20-716. Current figures are based on actual sales for January and February 2021, and March 2021 vintage forecast sales for March through December 2021.

Sales True-Up - Year 2021						
	Residential	Commercial	Demand	Metered Lighting	Interdept.	Total
\$1,000's						
Projected	-8,794	8,440	171,401	41	53	171,141
Current	-21,422	6,597	150,029	41	97	135,342
GWH Sales*						
Projected	8,647	784	17,826	120	7	27,384
Current	8,784	803	18,220	119	6	27,931

* Table includes total lighting class sales

Property Tax True-Up

The property tax forecast included in the Company's 2020 electric rate case application (Docket No. E002/GR-20-723) results in no refund to customers. The Company's current property tax forecast projects a customer refund of \$6.6 million.

Capital True-Up

We continue to forecast no refund for the capital true-up.

Correction:

Please note that we are correcting this response to remove the "Protected Data" markings from the table on page 1 and are re-providing as public information. We apologize for any inconvenience caused by the initial mis-markings.

Preparer: Steve Huso / Benjamin Halama
Title: Pricing Consultant / Manager, Revenue Analysis
Department: Regulatory Analysis / Revenue Requirements North
Telephone: 612-330-2944 / 612-330-5703
Date: April 16, 2021 **Corrected: April 22, 2021**

CERTIFICATE OF SERVICE

Re: *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of 2021 True-Up Mechanisms*
MPUC Docket No. E-002/M-20-743

In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota
MPUC Docket Number: E-002/GR-20-723

I, JUDY SIGAL, hereby certify that on the 22nd day of April, 2021, I e-filed with eDockets *Initial Comments of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal

JUDY SIGAL

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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