



414 Nicollet Mall
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September 24, 2024

—Via Electronic Filing—

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

RE: INITIAL COMMENTS
COMMUNITY SOLAR GARDEN PROGRAM
DOCKET NO. E002/M-13-867

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the attached Initial Comments pursuant to the Minnesota Public Utilities Commission's (Commission) August 23, 2024 Notice of Comment Period regarding the Company's ARR Compliance Filing submitted on July 31, 2024.

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 Lynnette Sweet at lynnette.m.sweet@xcelenergy.com or me at nick.paluck@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

/s/

NICK PALUCK
MANAGER, REGULATORY ANALYSIS

Enclosures
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 CO. D/B/A
XCEL ENERGY FOR APPROVAL OF ITS
PROPOSED COMMUNITY SOLAR GARDEN
PROGRAM

DOCKET No. E002/M-13-867

INITIAL COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits these Initial Comments pursuant to the Minnesota Public Utilities Commission's (Commission) August 23, 2024 Notice of Comment Period regarding the Company's ARR Compliance Filing submitted on July 31, 2024.

COMMENTS

The Commission's August 23 Notice identified the issue for comments as: "Was Xcel Energy's ARR Compliance filing on July 31, 2024 properly filed by the process established in the July 22, 2022 Commission order." The Notice included specific topics open for Comment which the Company addresses below.

I. ALIGNMENT WITH JUNE 22, 2022 ORDER

The first issue identified in the Notice is: "Does Xcel Energy's February 1, 2024 compliance filing and subsequent July 31, 2024 compliance filing align with the requirements of the Commission's July 22, 2022 Order?"

The July 22, 2022 Order required the use of the 30-day negative checkoff process for implementing the revised ARR rates. The Company acknowledges that its compliance filing did not align with this order. This was not intentional. The February 1, 2024 filing showed the Company's understanding that the prior approach to updating the ARR rate, in use for approximately ten years, would apply here. Under this process,

the Executive Secretary would issue a Notice to approve the rates before the Company would file a compliance tariff with the revised rates. The Company would only apply the revised rates after they were in the revised compliance tariff filed with the Commission. Following this prior approach for updating the ARR rate was an error made by the Company. After Cooperative Energy Futures (CEF) on July 29, 2024 pointed out to the Company the specific provisions of the July 22, 2022 Order, the Company promptly filed its July 31, 2024 compliance filing with the revised ARR rates.

II. ADJUSTING THE EFFECTIVE DATE

The second issue identified in the Notice is: “Should the Commission require Xcel Energy to adjust the effective date to the originally filed April 1, 2024 date as requested by the letter submitted by Cooperative Energy Futures?”

For practical and legal reasons discussed below, the Company opposes this specific requirement. The Company, however, presents an alternative means to rectify the issue noted above.

First, adjusting the effective date of the credit presents considerable practical problems for the Company and result in needless delays. The Company has analyzed what it would take to retroactively apply the revised ARR rates back to April 1, 2024, as requested by CEF. There are approximately 28,000 subscribers, and for the four months of retroactive rates being sought here (production for April, May, June and July 2024), this would include retroactive rates for approximately 112,000 invoices. We show in the table below the differences in the bill credit rates between the revised rates in compliance and the prior bill credit rates. We note that while for the residential subscriber class the revised bill credit rates are higher than the prior rates, for the Small General Service and General Service classes the revised bill credit rates are lower than the prior rates. We are uncertain if CEF is proposing that the revised rates be applied to all subscribers – regardless of whether the revised bill credit rates are higher or lower than the prior rates.

Table 1: Difference in Bill Credit Rates 2023 vs. 2024

Customer Class	Bill Credit Type	Bill Credit Rate per kWh (AC) for Energy Delivered to Company
Residential Service	Standard	\$0.152520 .15789
	Enhanced – Solar Gardens > 250 KW (AC)	\$0.172520 .17789
	Enhanced – Solar Gardens ≤ 250 KW (AC)	\$0.182520 .18789
Small General Service	Standard	\$0.159690 .15650
	Enhanced – Solar Gardens > 250 KW (AC)	\$0.179690 .17650
	Enhanced – Solar Gardens ≤ 250 KW (AC)	\$0.189690 .18650
General Service	Standard	\$0.131860 .13170
	Enhanced – Solar Gardens > 250 KW (AC)	\$0.151860 .15170
	Enhanced – Solar Gardens ≤ 250 KW (AC)	\$0.161860 .16170

Retroactively adjusting rates would require the Company to manually re-bill all the effected subscribers. With the understanding that about 112,000 invoices are at issue, to retroactively apply rates the Company estimates that this would take about three to six months (about 1500 person hours) from the time that we would start the project. Outside resources would need to be retained and upskilled to handle this, adding to the cost. The Company does not view this as a practical alternative.

Second, adjusting the effective date of already charged rates would result in retroactive rates that present legal problems. Under state statute, “Utilities are required to file schedules with the commission ‘showing all rates, tolls, tariffs and charges which it has established ***.’ Minn. Stat. § 216B.05, subd. 1.... Filings made with the commission by utilities ‘continue in force until amended by the public utility or until changed by the commission ***.’ Minn. Stat. § 216B.09, subd. 3....” A filed tariff is “an inherent part of the lawful rate changed to consumers.”¹ As stated by the Minnesota Supreme Court, “Ratemaking is a quasi-legislative function [(citation omitted)], and legislation operates prospectively. Indeed, the Public Utility Act expressly prohibits retroactive ratemaking. Minn. Stat. §216B.23, subd 1 ... provides: ‘[T]he commission shall *** by order fix reasonable rates *** to be imposed, observed and followed *in the future.*’ (*Emphasis added.*)” *Peoples Natural Gas v. Minnesota Public Utilities Commission*, 369 N.W.2d 530, 533 (Minn. 1985). In applying the doctrine against retroactive ratemaking, the Commission has stated that it “... *must require the Company to apply the rate in effect at the time of service. ... In order for the system of filed tariffs to be effective, the public must be able to look to the rate on file at the time service is rendered.*”²

¹ *Northern States Power Company v. City of Oakdale*, 588 N.W.2d 534, 537-538 (Minn. App. 1999), citing, *Computer Tool & Eng’g, Inc., v. Northern States Power Co.*, 453 N.W.2d 569, 573 (Minn. App. 1990).

² *In the Matter of the Request of Otter Tail Power Company to Forgive the Demand Charge and Ratchet Clause for Lakehead Pipeline Cass Lake Public Station for April 1995*, Docket No. E017/M-05-321, at page 2. (*Emphasis in original*).

The Commission, being established by statute, has only those powers given to it by the legislature. *Great Northern Railway Co. v. Public Service Commission*, 284 Minn. 217, 220, 169 NW2d 732, 735 (1969). “Although the statutes involved here are replete with references to words ‘fair,’ ‘just,’ and ‘reasonable,’ nothing in the statutory scheme suggests that the Commission may act as a court of equity....” *In the Matter of New Ulm Telecom*, 399 NW2d 111, 122 (Mn. Ct. App. 1987). Any “equitable powers” of the Commission must be found in the context of its statutory authority. *Senior Citizens Coalition v. Minnesota Public Utilities Commission*, 355 NW2d 295, 305 (Minn. 1984). In the words of the Commission, “The statute itself does not give the Commission the general power of an equity court.” (September 1984 Appellate Brief of the Commission in the New Ulm appeal referenced above, at p. 13, accessible on e-dockets under Docket No. 84-334). “The Commission remains a creature of statute. It presides over an ongoing, intricate regulatory process with duties prescribed by the legislature in considerable detail and where the legislature has generally required the agency to act prospectively.” *Peoples Natural Gas v. Minnesota Public Utilities Commission*, 369 NW2d 530535-536 (Minn. 1985). As explained by the Minnesota Supreme Court, “Historically, we have been reluctant to find implied statutory authority in the context of the MPUC's remedial power. As a general rule, we resolve any doubt about the existence of an agency's authority against the exercise of such authority.” *In re Qwest's Wholesale Service Quality Standards*, 702 N.W.2d 246 at 259 (Minn. 2005).

The only power of the Commission to issue a refund is as specified in Minn. Stat. § 216B.23 which states in part as follows:

216B.23 LAWFUL RATE; REASONABLE SERVICE.

Subdivision 1. Determination as to rate; order. Whenever upon an investigation made under the provisions of Laws 1974, chapter 429, the commission shall find rates, tolls, charges, schedules or joint rates to be unjust, unreasonable, insufficient, or unjustly discriminatory or preferential or otherwise unreasonable or unlawful, the commission shall determine and by order fix reasonable rates, tolls, charges, schedules, or joint rates to be imposed, observed, and followed in the future in lieu of those found to be unreasonable or unlawful.

Subd. 1a. Authority to issue refund. (a) On determining that a public utility has charged a rate in violation of this chapter, a commission rule, or a commission order, the commission, after conducting a proceeding, may require the public utility to refund to its customers, in a manner approved by the commission, any revenues the commission finds were collected as a result of the unlawful conduct. Any refund authorized by this section is permitted in addition to any remedies authorized by section 216B.16 or any other law governing rates. Exercising authority under this section does not preclude the commission from

pursuing penalties under sections 216B.57 to 216B.61 for the same conduct.

- (b) This section must not be construed as allowing:*
 - (1) retroactive ratemaking;*
 - (2) refunds based on claims that prior or current approved rates have been unjust, unreasonable, unreasonably preferential, discriminatory, insufficient, inequitable, or inconsistent in application to a class of customers; or*
 - (3) refunds based on claims that approved rates have not encouraged energy conservation or renewable energy use, or have not furthered the goals of section 216B.164, 216B.241, or 216C.05.*
- (c) A refund under this subdivision does not apply to revenues collected more than six years before the date of the notice of the commission proceeding required under this subdivision.*

*Subd. 2. **Finding as to service; order.** Whenever the commission shall find any regulations, measurements, practices, acts, or service to be unjust, unreasonable, insufficient, preferential, unjustly discriminatory, or otherwise unreasonable or unlawful, or shall find that any service which can be reasonably demanded cannot be obtained, the commission shall determine and by order fix reasonable measurements, regulations, acts, practices, or service to be furnished, imposed, observed and followed in the future in lieu of those found to be unreasonable, inadequate, or otherwise unlawful, and shall make any other order respecting the measurement, regulation, act, practice, or service as shall be just and reasonable.*

As shown by the provisions of this statute, where an improper rate has been set in the tariff, the Commission can set a new rate to be applied in the future. The Commission only has the authority to issue a refund where a utility “has charged a rate” and for “any revenues” that were collected. The bill credits at issue here do not amount to a charged rate and also do not constitute revenues. The bill credits reduce the amount of a subscriber’s bill and the Company does not earn revenues based on the amount of the bill credits. Where bill credits are provided, the true-up is in the fuel clause where all bill credits are recovered. This has no net impact on the Company’s revenues.

Despite this limitation, the statute does provide for charging a rate to be applied in the future where an incorrect rate has been in the Company’s tariff. Along these lines, the Company proposes to adjust the bill credit rate to subscribers of Legacy CSGs to effectively make-up on a class basis³ for the previously incorrect tariffed bill credit

³ Some subscribers in 2024 might not be subscribers from April to July 2025, so these types of subscribers will not get the modification of the bill credit rate that we are proposing. However, on an overall basis, the subscriber class will get the impact of the changes to the bill credit rate.

rate. This solution would adjust future bill credits to provide an offset for the previous error for each subscriber class. The Company proposes that this adjustment apply to the bill credit that would otherwise be in place for production in April, May, June and July 2025. These months align with the same months in 2024 where the incorrect bill credit rate was tariffed and applied, so that there would generally be expected alignment with the amount of generation based on the angle of the sun and hours of sunlight would be expected to be roughly the same. Also, this timing allows the Commission time to consider this matter, issue its order, and time for the Company to file compliance tariffs and have the revised billing loaded in its billing systems.

For residential subscribers, we propose that an *adder* to the bill credit in the amount of \$ 0.00537 / kWh be applied for the months of April-July 2025, reflecting the difference in value from the prior ARR rate and current ARR rate for this class of subscribers. For Small General Service subscribers, we propose a *subtractor* to the bill credit in the amount of \$ 0.00319 / kWh be applied for the months of April-July 2025. For General Service subscribers we propose a *subtractor* to the bill credit in the amount of \$ 0.00016 / kWh be applied for the months of April-July 2025. We also note that April 1, 2025 also coincides with the beginning date when the ARR transitions to the VOS. The Company attaches proposed tariffs as Attachment A that align with its recommended approach.

III. OTHER ISSUES OR CONCERNS

The Company has addressed pertinent issues above.

CONCLUSION

The Company recommends that the Commission adopt the approach suggested by the Company above and approve the proposed tariffs which are attached.

Dated: September 24, 2024

Northern States Power Company

Redline

SOLAR*REWARDS COMMUNITY PROGRAM
(Continued)

Section No. 9
~~Original~~1st Revision Sheet No. 64.1b

to the Building Subscription Model changes, then the garden operator shall promptly change the identification in the Company's systems as to whether the Subscription is subject to the Building Subscription Model. In situations where the garden operator has identified that the Subscription is not subject to the Building Subscription Model, but it in fact is subject to the Building Subscription Model, then the Company may collect from the garden operator all improperly applied residential adders associated with the Subscription for a period going back to one year from the date that the Company provides notice to the garden operator that the residential adder should not have been applied. Payment from the garden operator to the Company shall be made within 30 days of demand. Any failure to timely make this payment shall be considered as a breach of the Standard Contract for Solar*Rewards Community. The garden operator shall follow the Dispute Resolution provisions of the Standard Contract for Solar*Rewards Community for any dispute about this.

For those applications that previously qualified for, but no longer qualify for, for the applicable retail rate, the following adders apply to the 2017 VOS Vintage Year Bill Credit Rate table:

- a. A \$0.01/kWh adder to the VOS applies for production from April 1, 2025 to January 1, 2026 for subscriptions held by the large general service class; and
- b. A \$0.03/kWh adder to the VOS applies for production from and after April 1, 2025 for subscriptions held by the residential and small general service classes.

For those applications that previously qualified for, but no longer qualify for, the applicable retail rate, the following adders or subtractors will also apply to the Bill Credit Rate for production from April 1, 2025 through July 31, 2025:

- a. For Residential subscribers, a \$0.00537/kWh adder applies.
- b. For Small General Service subscribers, a \$0.00319/kWh subtractor applies.
- c. For General Service subscribers, a \$0.00016/kWh subtractor applies.

(Continued on Sheet No. 9-64.101)

Date Filed: ~~09-25-23~~09-24-24 By: Ryan J. Long Effective Date: ~~04-01-25~~
President, Northern States Power Company, a Minnesota corporation
Docket No. E002/M-13-867 Order Date: ~~05-30-24~~

Clean

SOLAR*REWARDS COMMUNITY PROGRAM
(Continued)

Section No. 9
1st Revision Sheet No. 64.1b

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(Continued on Sheet No. 9-64.101)

Date Filed: 09-24-24

By: Ryan J. Long

Effective Date:

President, Northern States Power Company, a Minnesota corporation

Docket No. E002/M-13-867

Order Date:

CERTIFICATE OF SERVICE

I, Joshua DePauw, 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-13-867

Dated this 24th day of September 2024

/s/

Joshua DePauw
Regulatory Administrator

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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_13-867_Official
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