



414 Nicollet Mall
Minneapolis, MN 55401

August 29, 2019

—Via Electronic Filing—

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
NUCLEAR DECOMMISSIONING ACCRUAL
DOCKET NO. E002/M-17-828

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Reply Comments in response to Comments received on August 19, 2019 from the Department of Commerce, Division of Energy Resources and the Office of the Attorney General – Residential Utilities and Antitrust Division.

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 Amber Hedlund at amber.r.hedlund@xcelenergy.com or (612) 337-2268 or me at bria.e.shea@xcelenergy.com or (612) 330-6064 if you have any questions regarding this filing.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY & STRATEGIC ANALYSIS

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Dan Lipschultz	Commissioner
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF THE 2019-2021
TRIENNIAL NUCLEAR DECOMMISSIONING
STUDY AND ASSUMPTIONS

DOCKET NO. E002/M-17-828

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments in response to Comments received on August 19, 2019 from the Department of Commerce, Division of Energy Resources (Department) and the Office of the Attorney General – Residential Utilities and Antitrust Division (OAG).

We appreciate the thorough review of our compliance filing by both the Department and OAG. In our Reply below, we address the accrual, the cost of capital inputs and the Company's Sinking Fund.

REPLY COMMENTS

A. Accrual Calculation

The Commission's January 7, 2019 Order set the accrual amount to \$44.4 million effective 2020, subject to possible revision based on our July 15, 2019 compliance filing (Compliance Filing). In our Compliance Filing, we recommended lowering the accrual to \$22.8 million. This amount was calculated using an accrual near the midpoint of the 90 percent and 75 percent recovery scenarios for the dry fuel storage cost reimbursement that will be received from the Department of Energy (DOE). After reviewing our Compliance Filing, the Department recommends setting the accrual to \$27.4 million using the 75 percent recovery scenario. The Company agrees that the 75

percent scenario is a reasonable, conservative option and does not object to using this approach. If possible, we plan to reflect the accrual change in our next rate case.

We understand the OAG does not want to change course in respect to the use of DOE reimbursement funds. However, we believe using the DOE Reimbursement to offset some of the decommissioning costs will provide an immediate benefit to customers and is the appropriate approach.

B. End of Life Nuclear Fuel Accrual.

1. Cost of Capital Inputs

The Department noted that our calculation of the annual End of Life (EOL) nuclear fuel accrual in our Compliance Filing used the incorrect cost of capital inputs. Our Compliance Filing erroneously used the capital structure and capital cost estimates approved in our 2012 rate case (Docket No. E002/GR-12-961). We provide as Schedule A to these Reply Comments the corrected calculation using inputs from our most recent rate case (Docket No. E002/GR-15-826). This results in an increase of approximately \$57,632 in the Minnesota jurisdictional accrual.

2. Sinking Fund

The Department's Comments also raised a concern related to the sinking fund methodology. The EOL Nuclear Fuel Accrual (EOL Accrual) is typically approved in the triennial nuclear decommissioning docket and at the point an order is received, it is treated as strictly an accounting change. Similar to the accrual to fund the nuclear decommissioning trust fund, no change in rates is implemented at that point in time.

While the EOL Accrual and Decommissioning Accrual both function by setting funds aside, the EOL Accrual is different in that its funds are held within the company. As such, there is an added offset to rate base for the EOL funds that customers receive resulting in a lower return on rate base components in general rates.

The rate base and accruals collected are put into rates in the Company's general rate case filings. At that point both are in parity – meaning that for the first year the customer pays the full accrual amount and receives the full benefit of the rate base impact through rates. However, as noted by the Department, in future years the customer needs to be compensated for the additional offset to rate base that it should receive for the contributions it has made since the general rate was approved. To compensate for this, the assumed accrual increases to an amount which includes the rate base impact the customer should receive. In this way, the customer is credited for

the benefit they should receive by essentially investing the assumed return into the EOL fund balance. As such, every year that passes, the assumed accrual will increase without an increase to rates, to compensate for the assumed interest until another general rate case is filed and ordered on. At this point, the higher accrual is put into rates, offset by a larger rate base offset.

In summary, the EOL Accrual increases annually without an increase in rates in order to compensate for the assumed interest. This process resets or rebalances every time a new general rate case is filed where the rate base benefit is adjusted to reflect the past amount contributed. To illustrate this impact, Schedule B to these Reply Comments shows the calculated impacts from 2020 through 2023 and how the return on rate base is offset by the increasing accrual.

C. Additional Information

The Department recommended that by January 10, 2020 the Company provide the following information:

- Fully describe exactly what information and analysis Goldman Sachs provides and how the NDT Committee evaluates that information within the framework of its fund strategy to make allocation decisions to optimize the NDT's risk/return profile.
- Fully describe how Xcel's NDT Committee evaluates changes in expected long-term returns and volatility in particular asset classes in its allocation decisions.
- Fully describe how the Company:
 - decides whether to pursue an active or passive strategy within that asset class,
 - selects one or more investment managers to manage the NDT's investments in U.S. large capitalization equities,
 - monitors the performance of the managers it has selected,
 - determines whether to retain or replace those managers, and
 - manages its capital gains tax liability across its entire portfolio to
 - minimize its capital gains tax liability, and
 - ensures that ratepayers fully benefit from Xcel's minimization of capital gains.
- Fully explain how these decisions impact expenses associated with manager turnover and asset turnover, as well as tax expense.

We have no issues with providing the requested information by January 10, 2020. We understand that the Department continues to have concerns with our asset allocation and portfolio returns. While we are not in agreement with their overall conclusions, we appreciate the constructive approach suggested by the Department and believe working

with them will lead to more alignment in the next triennial nuclear decommissioning docket.

CONCLUSION

We appreciate the thorough review of our compliance filing by the Department and OAG. We hope to be able to implement any accrual changes into our next rate case filing, and we look forward to working with the Department in advance of our next triennial filing.

Dated: August 29, 2019

Northern States Power Company

NSPMN
 EOL Nuclear Fuel Example
 Total Company
Assuming General Rates updated to reflect 2020 accrual and balance

Year	Rate Base	Return on Ratebase			Accrual			Total Impact		
		In Rates	Calculated	Difference	In Rates	Calculated	Difference	In Rates	Calculated	Difference ¹
2020	(66,857,384)	(4,263,905)	(4,263,905)	-	2,856,756	2,856,756	-	(1,407,149)	(1,407,149)	-
2021	(69,714,140)	(4,263,905)	(4,446,098)	(182,193)	2,856,756	3,038,952	182,196	(1,407,149)	(1,407,146)	3
2022	(72,753,092)	(4,263,905)	(4,639,910)	(376,005)	2,856,756	3,232,764	376,008	(1,407,149)	(1,407,146)	3
2023	(75,985,856)	(4,263,905)	(4,846,084)	(582,179)	2,856,756	3,438,936	582,180	(1,407,149)	(1,407,148)	1

After-Tax Rate 6.378%

Note 1 - Variances due to summing a rounded monthly amount.

Current Assumptions

ANNUAL ACCRUAL

Generating Plant	Sinking Fund Rate (1)	Remaining Life 1/1/19 (2)	Amount to Recover (3)	Amount Recovered (4)	Annual Accrual (5)
Monticello	6.51%	11.75	\$73,999,696	\$35,490,547	\$2,283,300
Prairie Island	6.51%	15.30	53,047,873	28,082,941	1,000,596
			<u>\$127,047,569</u>	<u>\$63,573,488</u>	<u>\$3,283,896</u>

INPUT DATA

Tax Rate	41.37% (a)		
Rate of Return - Internal	<u>Percent</u>	<u>Cost</u>	<u>Weight</u>
Short-Term	2.14	0.68	0.01
Long-Term	45.30	5.02	2.27
Total Debt	47.44		2.28 (c)
Preferred	0.00	0.00	0.00
Common	52.56	9.83	5.17
Total	100.00		7.45 (d)
After-Tax Rate	6.51% (e)		

NOTES

Input Data
 (e) = (d) - [(c) x (a)]
 (2) = Remaining life based on E,G002/D-15-46
 (3) = Final Core Analysis from 2014 filing

Annual Accrual
 (5) = $\frac{\{(3) - (4)\} \times (1)}{\{(1 + (1))^{(2)} - 1\}}$

Xcel Energy
 End-of-Life Nuclear Fuel Accrual
 Present to Proposed Accrual Comparison
 Minnesota Retail Jurisdiction
 January - December 2020

	Present	Proposed	Difference
EXTERNAL FUND			
Monticello	\$2,394,336	\$1,019,268	(\$1,375,068)
Prairie Island	1,042,608	1,837,488	794,880
TOTAL (Total Company)	<u>\$3,436,944</u>	<u>\$2,856,756</u>	<u>(\$580,188)</u>
Minnesota Jurisdiction Factor	73.0558%	73.0558%	73.0558%
TOTAL (Minnesota Jurisdiction)	<u><u>\$2,510,887</u></u>	<u><u>\$2,087,026</u></u>	<u><u>(\$423,861)</u></u>

Per original July 15, 2019 Compliance Filing	2,029,394
Difference from Original	<u><u>\$57,632</u></u>

Current Assumptions

ANNUAL ACCRUAL

Generating Plant	Sinking Fund Rate (1)	Remaining Life 1/1/20 (2)	Amount to Recover (3)	Amount Recovered (4)	Annual Accrual (5)
Monticello	6.81%	10.75	\$73,999,696	\$37,773,847	\$2,394,336
Prairie Island	6.81%	14.30	53,047,873	29,083,537	1,042,608
			<u>\$127,047,569</u>	<u>\$66,857,384</u>	<u>\$3,436,944</u>

INPUT DATA

Tax Rate	28.11% (a)		
Rate of Return - Internal	<u>Percent</u>	<u>Cost</u>	<u>Weight</u>
Short-Term	2.14	0.68	0.01
Long-Term	45.30	5.02	2.27
Total Debt	47.44		2.28 (c)
Preferred	0.00	0.00	0.00
Common	52.56	9.83	5.17
Total	100.00		7.45 (d)
After-Tax Rate	6.81% (e)		

NOTES

Input Data

(e) = (d) - [(c) x (a)]

(2) = Remaining life based on E,G002/D-15-46

(3) = Final Core Analysis from 2014 filing

Annual Accrual

(5) = $\frac{\{(3) - (4)\} \times (1)}{\{(1 + (1))^{(2)} - 1\}}$

Proposed Assumptions

ANNUAL ACCRUAL

Generating Plant	Sinking Fund Rate (1)	Remaining Life 1/1/20 (2)	Amount to Recover (3)	Amount Recovered (4)	Annual Accrual (5)
Monticello	6.38%	10.75	\$52,856,869	\$37,773,847	\$1,019,268
Prairie Island	6.38%	14.30	70,018,922	29,083,537	1,837,488
			<u>\$122,875,791</u>	<u>\$66,857,384</u>	<u>\$2,856,756</u>

INPUT DATA

Tax Rate	28.11% (a)		
Rate of Return - Internal	<u>Percent</u>	<u>Cost</u>	<u>Weight</u>
Short-Term	1.69	4.31	0.07
Long-Term	45.81	4.75	2.18
Total Debt	47.50		2.25 (c)
Preferred	0.00	0.00	0.00
Common	52.50	9.06	4.76
Total	100.00		7.01 (d)
After-Tax Rate	6.38% (e)		

NOTES

Input Data

- (e) = (d) - [(c) x (a)]
- (2) = Remaining life based on E,G002/D-15-46
- (3) = Final Core Analysis from 2017 filing

Annual Accrual

(5) = $\frac{\{(3) - (4)\} \times (1)}{\{(1 + (1)) ^ (2)\} - 1}$

Proposed Assumptions

ANNUAL ACCRUAL

Generating Plant	Sinking Fund Rate (1)	Remaining Life 1/1/21 (2)	Amount to Recover (3)	Amount Recovered (4)	Annual Accrual (5)
Monticello	6.38%	9.75	\$52,856,869	\$38,793,115	\$1,084,272
Prairie Island	6.38%	13.30	70,018,922	30,921,025	1,954,680
			<u>\$122,875,791</u>	<u>\$69,714,140</u>	<u>\$3,038,952</u>

INPUT DATA

Tax Rate	28.11% (a)		
Rate of Return - Internal	<u>Percent</u>	<u>Cost</u>	<u>Weight</u>
Short-Term	1.69	4.31	0.07
Long-Term	45.81	4.75	2.18
Total Debt	47.50		2.25 (c)
Preferred	0.00	0.00	0.00
Common	52.50	9.06	4.76
Total	100.00		7.01 (d)
After-Tax Rate	6.38% (e)		

NOTES

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 (e) = (d) - [(c) x (a)]
 (2) = Remaining life based on E,G002/D-15-46
 (3) = Final Core Analysis from 2017 filing

Annual Accrual
 (5) = $\frac{\{(3) - (4)\} \times (1)}{\{(1 + (1)) ^ (2)\} - 1}$

Proposed Assumptions

ANNUAL ACCRUAL

Generating Plant	Sinking Fund Rate (1)	Remaining Life 1/1/22 (2)	Amount to Recover (3)	Amount Recovered (4)	Annual Accrual (5)
Monticello	6.38%	8.75	\$52,856,869	\$39,877,387	\$1,153,428
Prairie Island	6.38%	12.30	70,018,922	32,875,705	2,079,336
			<u>\$122,875,791</u>	<u>\$72,753,092</u>	<u>\$3,232,764</u>

INPUT DATA

Tax Rate	28.11% (a)		
Rate of Return - Internal	<u>Percent</u>	<u>Cost</u>	<u>Weight</u>
Short-Term	1.69	4.31	0.07
Long-Term	45.81	4.75	2.18
Total Debt	47.50		2.25 (c)
Preferred	0.00	0.00	0.00
Common	52.50	9.06	4.76
Total	100.00		7.01 (d)
After-Tax Rate	6.38% (e)		

NOTES

Input Data

- (e) = (d) - [(c) x (a)]
- (2) = Remaining life based on E,G002/D-15-46
- (3) = Final Core Analysis from 2017 filing

Annual Accrual

(5) = $\frac{\{(3) - (4)\} \times (1)}{\{(1 + (1))^{(2)} - 1\}}$

Proposed Assumptions

ANNUAL ACCRUAL

Generating Plant	Sinking Fund Rate (1)	Remaining Life 1/1/23 (2)	Amount to Recover (3)	Amount Recovered (4)	Annual Accrual (5)
Monticello	6.38%	7.75	\$52,856,869	\$41,030,815	\$1,226,988
Prairie Island	6.38%	11.30	70,018,922	34,955,041	2,211,948
			<u>\$122,875,791</u>	<u>\$75,985,856</u>	<u>\$3,438,936</u>

INPUT DATA

Tax Rate	28.11% (a)		
Rate of Return - Internal	<u>Percent</u>	<u>Cost</u>	<u>Weight</u>
Short-Term	1.69	4.31	0.07
Long-Term	45.81	4.75	2.18
Total Debt	47.50		2.25 (c)
Preferred	0.00	0.00	0.00
Common	52.50	9.06	4.76
Total	100.00		7.01 (d)
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Input Data
 (e) = (d) - [(c) x (a)]
 (2) = Remaining life based on E,G002/D-15-46
 (3) = Final Core Analysis from 2017 filing

Annual Accrual
 (5) = $\frac{\{(3) - (4)\} \times (1)}{\{(1 + (1))^{(2)} - 1\}}$

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-17-828

Dated this 29th day of August 2019

/s/

Lynnette Sweet
Regulatory Administrator

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