



414 Nicollet Mall
Minneapolis, MN 55401

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April 23, 2020

—Via Electronic Filing—

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

RE: PROPOSED ADJUSTMENT TO THE 2020 ANNUAL FUEL FORECAST AND
MONTHLY FUEL COST CHARGES
DOCKET NO. E002/AA-19-293

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this proposal to adjust the 2020 fuel forecast and monthly fuel cost charges to provide immediate rate relief to customers during this time of need. In addition to this filing, today we also are filing a separate but related temporary relief program consistent with the goals of the Business Incentive and Sustainability (BIS) Rider as well as a request for approval of clarifying edits to the BIS Rider tariff. The temporary relief program provides discounts to commercial customers with material impacts to their operations during the COVID-19 pandemic.

As noted in the March 26, 2020 letter the Company submitted in Docket No. E,G999/CI-20-375, we have been evaluating a variety of options to mitigate the economic hardship faced by our customers as a result of the COVID-19 pandemic through both immediate relief and future recovery programs. The proposals we are filing today to adjust the fuel forecast and to expand access to the BIS Rider are a part of these ongoing efforts to provide aid to our affected customers.

Specifically, we are proposing to reduce the 2020 fuel forecast as allowed for under the reformed Fuel Clause Adjustment (FCA) process to immediately lower rates for our customers. We also are also proposing a temporary program under the BIS Rider to provide base rate relief to customers with material impacts to their energy use as a result of operational changes through the COVID-19 pandemic.

At Xcel Energy, we are committed to helping our customers through this crisis. We are continuing to work on additional relief and broader recovery efforts, and we plan to bring additional proposals to the Commission for approval as we develop them.

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

Sincerely,

/s/

AMY LIBERKOWSKI
DIRECTOR, REGULATORY PRICING AND ANALYSIS

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF THE 2020 ANNUAL
FUEL FORECAST AND MONTHLY FUEL
COST CHARGES

Docket No. E002/AA-19-293

RATE ADJUSTMENT PROPOSAL

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this proposed adjustment of the 2020 fuel cost charges for the months of June-August 2020. This adjustment will reduce the approved monthly fuel cost rates for those months.

PROPOSAL

The fuel clause adjustment (FCA) reform process approved by the Commission allows a utility to adjust its approved fuel rates in the case of a significant unforeseen impact. Specifically, Ordering Point 3 of the Commission's June 12, 2019 Order in Docket No. E999/CI-03-802 states:

The Commission adopts a threshold of plus or minus 5 percent of all FCA costs and revenues to determine whether an event qualifies as a significant unforeseen impact that may justify an adjustment to the approved fuel rates. The Electric utilities are permitted to implement revised rates following a 30-day notice period, subject to a full refund, if no party objects to the revised rates.

The Company believes that the current economic downturn caused by the COVID-19 pandemic is indeed a "significant unforeseen impact." In order to provide more

immediate relief to our customers during this unprecedented disruption to daily life, we propose to reduce monthly fuel rates for June, July, and August 2020 by a total of \$25 million for the three-month period. Implementation on June 1, 2020 provides for the 30-day notice period specified by the June 12 Order. To the extent the Commission thinks it necessary, we also request a variance to the Ordering Point 3 to allow implementation of an adjustment to the fuel rates that does not meet the 5 percent threshold.

Several factors allow us to make this adjustment to the fuel rates at this time. First, our coal fleet has operated less than expected due to reduced commitments from the MISO market. This has reduced costs for coal generation, though that reduction is partially offset by additional costs for gas generation and purchased power needed to replace coal generation. In addition, commodity prices have declined, in particular natural gas prices. While there remains uncertainty on forward market commodity prices, our initial review of forecasted costs and revenues leads us to expect an overall reduction from the approved fuel costs for the 2020 forecast year.

To simplify and expedite the rate adjustment process, we propose to reduce the total 2020 fuel forecast by \$25 million. This reduction considers estimated impacts of the drivers discussed above. By applying the reduction to the three summer months, we can impact customers' bills more quickly and with greater impact in each of those three months than if the reduction were spread throughout the remainder of the year. Additionally, bill reductions in these months will provide some relief should we experience warm weather.

Attachment A shows the calculation of the proposed reduced fuel rates for June, July and August 2020. The \$25 million reduction is recognized in three equal credits applied to each of the three months. Attachment A, page 1 shows the approved 2020 forecast as updated in the Company's July 31, 2019 Reply Comments in this docket with an additional line to reduce the Minnesota fuel costs for each of the three months.¹ Attachment A, pages 3 and 4 show the class allocation for the adjusted months. Attachment A, page 2 shows the final rates we propose to implement for each month by customer class.

We plan to implement these revised rates for June, July, and August 2020 (subject to reversal) if no party objects during the 30-day notice period. We will update the Company web site with the adjusted monthly fuel cost charges prior to

¹ This updated forecast was approved in the Commission's November 14, 2019 Order.

implementation on June 1, 2020 at the following link:

https://www.xcelenergy.com/company/rates_and_regulations/rates/rate_riders.

The extraordinary circumstances we are experiencing as a result of the COVID-19 pandemic make it unusually difficult to accurately predict annual fuel expense and recovery for 2020. That said, we believe our proposal to provide immediate savings for our customers is appropriate, particularly under current circumstances. We also want to emphasize that this proposal is based on a forecast during a highly uncertain period of time and that significant under- or over-recovery may still occur in 2020. To the extent the Company ultimately under-recovers its actual fuel expense in 2020, we hope the Commission will take this current proposal into account when evaluating our report next spring.

Please note that Attachment A is marked as “Not Public.” Certain data is considered to be “not public data” pursuant to Minn. Stat. §13.02, Subd.9, and is “Trade Secret” information pursuant to Minn. Stat. §13.37, subd. 1(b) as this data derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

CONCLUSION

The Company respectfully requests that the Commission approve Xcel Energy’s proposed adjustment to the June, July, and August 2020 fuel cost charges.

Dated: April 23, 2020

Northern States Power Company

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Northern States Power Company
Electric Utility - State of Minnesota
Jan 2020 - Dec 2020

Protected Data is shaded in gray.

Line # Updated July 2019

	1/1/2020	2/1/2020	3/1/2020	4/1/2020	5/1/2020	6/1/2020	7/1/2020	8/1/2020	9/1/2020	10/1/2020	11/1/2020	12/1/2020	2020 Total
1	Costs in \$1,000's												
2													
3	Own Generation												
4	Fossil Fuel												
5	Coal												
6	Wood/RDF												
7	Natural Gas CC												
8	Natural Gas & Oil CT												
9	Subtotal												
10													
11	Hydro												
12	Wind												
13													
14	Nuclear Fuel												
15													
16	Purchased Energy												
17	LT Purchased Energy (Gas)												
18	LT Purchased Energy (Solar)												
19	Community Solar*Gardens												
20	LT Purchased Energy (Wind)												
21	LT Purchased Energy (Other)												
22	ST Market Purchases												
23	Subtotal												
24													
25	Total System Costs												
26													
27	Less Sales Revenue												
28	Less Solar Gardens - Above Market Cost												
29	Less WindSource												
30	Less Renewable Connect												
31													
32	Net System Costs												
33													
34	Net System Sales												
35	Calendar Month MWh Sales												
36													
37	Less Windsource MWh Sales												
38	Less Renewable Connect MWh Sales												
39													
40	Net Sys MWh Sales												
41													
42	System Cost in cents/kWh												
43													
44	Minnesota Juris. MWh Sales												
45													
46	Less Windsource MWh Sales												
47	Less Renewable Connect MWh Sales												
48													
49	Net MN MWh Sales												
50													
51	MN Fuel Cost												
52	Solar Gardens - Above Market Cost												
53	Laurentian Buyout costs												
54	Pine Bend Buyout Cost												
55	Benson Buyout Cost												
55a	\$0	\$0	\$0	\$0	\$0	(\$8,333)	(\$8,333)	(\$8,334)	\$0	\$0	\$0	\$0	(\$25,000)
56													
57	Forecast MN FCA Costs												
58													
59													
60	Forecast MN FCA Cost in cents/kWh												
61													
62													
63	Forecast MN FCA Cost in \$/MWh												

PROTECTED DATA ENDS]

Proposed 2020 Monthly Fuel Clause Charges (\$/KWh)

	Residential	Commercial & Industrial			Outdoor Lighting	
		Non-Demand	Demand			
			Non-TOD	On-Peak		Off-Peak
January	\$0.02472	\$0.02503	\$0.02426	\$0.03031	\$0.01986	\$0.01940
February	\$0.02685	\$0.02719	\$0.02634	\$0.03293	\$0.02155	\$0.02105
March	\$0.02801	\$0.02836	\$0.02748	\$0.03436	\$0.02248	\$0.02196
April	\$0.02919	\$0.02956	\$0.02864	\$0.03579	\$0.02344	\$0.02290
May	\$0.03080	\$0.03119	\$0.03022	\$0.03778	\$0.02473	\$0.02416
June	\$0.03134	\$0.03173	\$0.03074	\$0.03845	\$0.02515	\$0.02456
July	\$0.02717	\$0.02752	\$0.02666	\$0.03334	\$0.02180	\$0.02130
August	\$0.02657	\$0.02691	\$0.02607	\$0.03260	\$0.02132	\$0.02083
September	\$0.02879	\$0.02915	\$0.02824	\$0.03531	\$0.02310	\$0.02257
October	\$0.02782	\$0.02817	\$0.02729	\$0.03412	\$0.02233	\$0.02181
November	\$0.02519	\$0.02550	\$0.02471	\$0.03090	\$0.02021	\$0.01974
December	\$0.02335	\$0.02364	\$0.02291	\$0.02864	\$0.01874	\$0.01831

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Northern States Power Company,
Electric Operations - State of Minnesota
Monthly Fuel Clause Charge January 2020 - December 2020

Docket No. E002/AA-19-293

Rate Adjustment Filing

Attachment A

Page 3 of 4

Protected Data is shaded in gray.

SHADED LINES CONTAIN TRADE SECRET DATA

Month Fuel Cost Charges Applied to Customer Billing Jan-20 Feb-20 Mar-20 Apr-20 May-20 Jun-20 Jul-20 Aug-20 Sep-20 Oct-20 Nov-20 Dec-20 12 Months

FORECASTED COST OF FUEL

[1] Forecasted MN Cost in \$1,000's	[PROTECTED DATA BEGINS]												\$771,051
[2] Forecasted Minn. Retail Sales Subject to FCC *													28,627,389
[3] Forecasted MN Cost in cents/kWh [1]/[2]*100													2.693¢

PROTECTED DATA ENDS]

Class FAF Ratio													
[4] Residential FAF Ratio	1.0177	1.0177	1.0177	1.0177	1.0177	1.0177	1.0177	1.0177	1.0177	1.0177	1.0177	1.0177	1.0177
[5] C&I Non-Demand FAF Ratio	1.0305	1.0305	1.0305	1.0305	1.0305	1.0305	1.0305	1.0305	1.0305	1.0305	1.0305	1.0305	1.0305
[6] C & I Demand Non-TOD FAF Ratio	0.9984	0.9984	0.9984	0.9984	0.9984	0.9984	0.9984	0.9984	0.9984	0.9984	0.9984	0.9984	0.9984
[7] C & I Demand TOD On-Peak FAF Ratio	1.2486	1.2486	1.2486	1.2486	1.2486	1.2486	1.2486	1.2486	1.2486	1.2486	1.2486	1.2486	1.2486
[8] C & I Demand TOD Off-Peak FAF Ratio	0.8166	0.8166	0.8166	0.8166	0.8166	0.8166	0.8166	0.8166	0.8166	0.8166	0.8166	0.8166	0.8166
[9] Outdoor Lighting FAF Ratio	0.7976	0.7976	0.7976	0.7976	0.7976	0.7976	0.7976	0.7976	0.7976	0.7976	0.7976	0.7976	0.7976

[PROTECTED DATA BEGINS]

2020 Monthly Fuel Cost Charges												
[10] Residential [3]*[4]												
[11] C & I Non-Demand [3]*[5]												
[12] C & I Demand Non-TOD [3]*[6]												
[13] C & I Demand TOD On-Peak [3]*[7]												
[14] C & I Demand TOD Off-Peak [3]*[8]												
[15] Outdoor Lighting [3]*[9]												

MN Retail MWh Subject to FCA *												
[16] Residential												
[17] C & I Non-Demand												
[18] C & I Demand Non-TOD												
[19] C & I Demand TOD On-Peak												
[20] C & I Demand TOD Off-Peak												
[21] Outdoor Lighting												
[22] Total												

2020 Class Fuel Cost Revenues in \$1,000's												
[23] Residential [10]*[16]/100												
[24] C & I Non-Demand [11]*[17]/100												
[25] C & I Demand Non-TOD [12]*[18]/100												
[26] C & I Demand TOD On-Peak [13]*[19]/100												
[27] C & I Demand TOD Off-Peak [14]*[20]/100												
[28] Outdoor Lighting [15]*[21]/100												
[29] Total [23]+[24]+[25]+[26]+[27]+[28]												

[30] 2020 Cost vs Revenue Diff in \$1,000's [9]-[29]													PROTECTED DATA ENDS]
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Protected Data is shaded in gray.

SHADED LINES CONTAIN TRADE SECRET DATA

Month Fuel Cost Charges Applied to Customer Billing	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	12 Months
[PROTECTED DATA BEGINS]													
[31] 2020 Cost vs Revenue Diff in \$1,000's [30]													
[32] MN Retail MWh Subject to FCA * [22]													
[33] Monthly Class Ratio Adjustment [31]/[32]*100													
2020 Proposed Monthly Fuel Cost Charges in \$/kWh													
[34] Residential [10]/100+[33]/100													
[35] C & I Non-Demand [11]/100+[33]/100													
[36] C & I Demand Non-TOD [12]/100+[33]/100													
[37] C & I Demand TOD On-Peak [13]/100+[33]/100													
[38] C & I Demand TOD Off-Peak [14]/100+[33]/100													
[39] Outdoor Lighting [15]/100+[33]/100													
* Excluded Windsource and Renewable*Connect													
2020 Proposed Costs verses Revenues													
2020 Class Fuel Cost Revenues in \$1,000's													
[40] Residential [34]*[16]													
[41] C & I Non-Demand [35]*[17]													
[42] C & I Demand Non-TOD [36]*[18]													
[43] C & I Demand TOD On-Peak [37]*[19]													
[44] C & I Demand TOD Off-Peak [38]*[20]													
[45] Outdoor Lighting [39]*[21]													
[46] Total [40]+[41]+[42]+[43]+[44]+[45]													
[47] Total Forecasted MN Costs [1]													
[48] 2020 Cost vs Revenue Diff in \$1,000's [47]-[46]													
[PROTECTED DATA ENDS]													

CERTIFICATE OF SERVICE

I, Jim Erickson, 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/AA-19-293

Dated this 23rd day of April 2020

/s/

Jim Erickson
Regulatory Administrator

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John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_19-293_AA-19-293
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Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_19-293_AA-19-293

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_19-293_AA-19-293
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-293_AA-19-293
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-293_AA-19-293
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-293_AA-19-293
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