



414 Nicollet Mall  
Minneapolis, MN 55401

October 8, 2024

—Via Electronic Filing—

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

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

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits these Reply 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 and in response to the Minnesota Department of Commerce's (Department) September 24, 2024 Comments submitted in the above-referenced docket.

We appreciate the Department's Comments, but do not suggest that the Commission adopt their recommendation to apply the updated ARR bill credit retroactively from April 1, 2024, which would violate the Minnesota law prohibiting retroactive ratemaking. We believe the Company's proposal to adjust the future ARR bill credit rate for April, May, June, and July 2025 provides a better solution, because it aligns with the Minnesota law, is squarely within the Commission's authority to approve, and achieves the same outcome as the Department's proposal—making up the previous error by offsetting the incorrect tariffed bill credit rate for four months for each customer class.

As described in our September 24, 2024 Comments, 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 for when the ARR transitions to the VOS.

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 [lynette.m.sweet@xcelenergy.com](mailto:lynette.m.sweet@xcelenergy.com) or me at [nick.paluck@xcelenergy.com](mailto:nick.paluck@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

NICK PALUCK  
MANAGER, REGULATORY ANALYSIS

Enclosures  
cc: Service List

## CERTIFICATE OF SERVICE

I, Marie Horner, 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 8th day of October 2024

/s/

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Marie Horner  
Regulatory Administrator

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