



May 26, 2021

VIA E-FILING

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

Andrew P. Moratzka
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**Re: In the Matter of the Petition of Northern States Power Company, dba Xcel Energy,
for Approval of True-Up Mechanisms
PUC Docket No. E002/M-19-688**

**In the Matter of the Application of Northern States Power Company dba Xcel
Energy for Authority to Increase Rates for Electric Service in the State of
Minnesota
PUC Docket No. E-002/GR-20-723**

**In the Matter of the Petition of Northern States Power Company dba Xcel Energy
for Approval of 2021 True-up Mechanisms
PUC Docket No. E-002/M-20-743**

Dear Mr. Seuffert:

Without waiving any legal rights or remedies regarding its written arguments submitted in the above referenced dockets, and as a compromise position, the Xcel Large Industrials (“XLI”) offer the following additional decision alternatives for the Minnesota Public Utilities Commission’s (the “Commission’s”) consideration.

Docket No. E002/M-19-688

New decision alternative:

Reduce Xcel’s 2020 sales-true up recovery to \$109.532 million, which is the total true-up from Table 3 of the briefing papers, less the \$9.916 million assumed sales revenue growth referenced in Attachment F of Xcel Energy’s compliance filing, pg. 1 of 3. Cost responsibility for the \$109.532 million shall be borne by the Commercial, Demand, Lighting-Metered, and Interdepartmental classes, on a pro-rata reduced basis from Table 3 of the briefing papers. The residential class shall not receive a bill credit.

Docket No. E002/M-20-743; E002/GR-20-723

Amended decision alternative:

4. Grant the Department's request, reopen the Commission's April 2, 2021 Order and modify the 2021 Stay-Out to incorporate a 1/3 sharing between the Demand Class, Xcel, and all other customers as follows, under current projections: by using \$57 million of Non-Protected ADIT that was paid for by all customers

- The total true-up is currently estimated to be \$125.426 million (which is the total true-up from Table 2 in the briefing papers, less the \$9.916 million sales growth referenced in Exhibit 1 of Xcel Energy's October 30, 2020, filing, pg. 2 of 2);
- The true up for Commercial and C&I Demand customers is capped at one-third of the total final amount (currently estimated to be roughly \$41.8 million), other non-residential customers shall not pay a true-up;
- One-third of non-protected ADIT that was paid for by all customers is utilized to offset a portion of the amount due by Commercial and C&I Demand customers (currently estimated to be roughly \$41.8 million);
- The remaining one-third is covered by a refund otherwise due to residential customers (currently estimated to be approximately \$21.4 million) and Xcel (for the remaining approximately \$21.4 million).

Any sales revenue true-up amounts in excess of \$125.426 million shall be deferred for potential recovery in Xcel Energy's next rate case.

XLI looks forward to the hearing on the above referenced matters, currently set for May 27, 2021.

Very Truly Yours,

/s/ Andrew P. Moratzka

Andrew P. Moratzka

APM:cmc

cc: Service Lists

CERTIFICATE OF SERVICE

I, Candyce M. Close, hereby certify that I have this day served a true and correct copy of the following document(s) to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

XLI DECISION ALTERNATIVE LETTER

In the Matter of the Petition of Northern
States Power Company, dba Xcel Energy,
for Approval of True-Up Mechanisms
PUC Docket No. E002/M-19-688

In the Matter of the Application of Northern
States Power Company for Authority to
Increase Rates for Electric Service in the
State of Minnesota
PUC Docket No. E002/GR-20-723

In the Matter of the Petition of Northern
States Power Company d/b/a Xcel Energy for
Approval of 2021 True-up Mechanisms
PUC Docket No. E002/M-20-743

Dated this 26th day of May, 2021.

/s/ Candyce M. Close
Candyce M. Close

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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_20-723_20-723

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_20-723_20-723
Joseph L	Sathe	jsathe@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-723_20-723
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-723_20-723
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_20-723_20-723
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_20-723_20-723
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_20-723_20-723
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-723_20-723
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2 San Francisco, California 94105	Electronic Service	No	OFF_SL_20-723_20-723
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_20-723_20-723
Thomas	Tynes	jjazyinka@energyfreedomcoalition.com	Energy Freedom Coalition of America	101 Constitution Ave NW Ste 525 East Washington, DC 20001	Electronic Service	No	OFF_SL_20-723_20-723
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-723_20-723
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_20-723_20-723
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-723_20-723
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-723_20-723

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-743_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_20-743_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, Minnesota 55117	Electronic Service	No	OFF_SL_20-743_Official
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_20-743_Official
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_20-743_Official
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Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_20-743_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_20-743_Official
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