



414 Nicollet Mall
Minneapolis, MN 55401

June 3, 2019

—VIA ELECTRONIC FILING—

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: RENEWABLE ENERGY OBLIGATION (REO)-RENEWABLE ENERGY STANDARD
(RES) COMPLIANCE REPORT

RENEWABLE ENERGY CERTIFICATE RETIREMENT AND REPORTING FOR
COMPLIANCE YEAR 2018
DOCKET NO. E999/PR-19-12

GREEN PRICING VERIFICATION FILING PROCESS
DOCKET NO. E999/PR-02-1240

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the attached compliance report to fulfill the verification and filing requirements for the Renewable Energy Standards (RES) Renewable Energy Credit (REC) retirement and Green Pricing REC retirement, required by Minn. Stat. § 216B.1691, Subd. 3.

We have provided the required information in the attached Excel spreadsheet templates. Attachment A contains REC retirements for RPS obligations and Green Pricing requirements.

REC Retirement

By May 1, 2019, the Company retired approximately 7.6 million RECs, representing 25 percent of annual retail sales for calendar year 2018, using the Midwest Renewable Energy Tracking System (M-RETS). The Company is therefore in compliance with the Minnesota RES requirements identified in Minn. Stat. § 216B.1691 subd. 2(a) and the Commission's March 19, 2010 Order in Docket No. E999/CI-03-869.

In addition, by May 1, 2019, the Company retired approximately 339,000 RECs for our Green Pricing Programs. Approximately 189,000 RECs were retired for the Windsource Program, approximately 139,000 RECs were retired for Renewable* Connect, and approximately 11,000 RECs were retired for the Renewable* Connect Government Program. Details of the Company's Green Pricing Program REC retirements are included in Attachment A.

The required information specified in the Commission's April 17, 2014 NOTICE and the May 28, 2013 ORDER FINDING UTILITIES IN COMPLIANCE WITH MINN. STAT. § 216B.1691 AND MODIFYING BIENNIAL REPORTING PROCEDURES in Docket No. E999/M-12-958, including the RES calculations, the RECs retired and the names of the M-RETS retirement sub-accounts, is provided in Attachment A.

As noted in Attachment A, the Company purchased 103,000 vintage 2018 RECs for the Windsource program, which are included in the total 189,000 RECs retired above in 2018.

Certified Renewable Percentage

Renewable energy plays a vital and growing role in our energy supply and plans for meeting our customers' needs. Likewise, communities and corporations are increasingly setting renewable energy targets. As our system transitions to more renewable generation, companies and communities are seeking clarity regarding how to count the renewable energy on our system toward their own goals. The need for innovation and the creation of a new approach were identified and accomplished with involvement from customers, including regular meetings with the Minnesota Sustainable Growth Coalition.

Beginning in 2019, for calendar year 2018, we will offer a Certified Renewable Percentage (CRP) to our customers and continue to provide that metric going forward. The CRP is a new Renewable Energy Certificate (REC)-based accounting methodology that clarifies the percentage of our system energy delivered to customers that is renewable. The CRP is not a subscription service or program customers need to enroll in. Instead, the Company will calculate, certify, and report annually a CRP for Minnesota. With the CRP, we will retire sufficient RECs on behalf of all our retail customers such that the total RECs retired annually reflects the portion of delivered energy that is renewable. This will allow all retail customers to claim the percentage of renewable energy on the system as the starting point towards their sustainability goals. Additionally, for customers who choose to go above our current and planned system

renewable percentage, the Company will continue to offer incremental voluntary renewable options, such as Renewable*Connect.

The detailed methodology for the CRP is provided in Attachment B.

The security and privacy of customer data, including energy usage data, is a key concern for the Company. As a matter of course, the Company generally does not publicly disclose energy usage data related to an individual customer. In previous years of the REO/RES REC filing, the customer participating in the Renewable*Connect Government Program has requested certain information related to its energy usage be considered Non-Public, but the Department of Commerce has requested the information be submitted publicly. In advance of this year's 2018 Compliance filing, the Company reached out to this customer asking if the information that it normally considers Non-Public could be submitted publicly for this year's 2018 REO/RES REC filing. The customer consented to the Company submitting the information as Public information. Notwithstanding this one-time consent, the Company reserves the right to submit similar information as Non-Public in the future.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document and served copies on all parties on the attached service list. If you have any questions about this information, please contact me at bria.e.shea@xcelenergy.com or (612) 330-6064, or Pamela Gibbs at pamela.k.gibbs@xcelenergy.com or (612) 330-2889.

Sincerely,

/s/

BRIA E. SHEA
DIRECTOR, REGULATORY AND STRATEGIC ANALYSIS

Attachments
c: Service Lists

Minnesota Public Utilities Commission: Docket No. E999/PR-19-12	Reporting Period: January 1, 2018 - December 31, 2018
Minnesota Department of Commerce: Docket No. E999/PR-02-1240	
Renewable Energy Certificate Retirement Report for Renewable Energy Standards and Green Pricing Programs	

Report Year: 2018	Date Submitted: June 1, 2019
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FILING UTILITY INFORMATION		CONTACT INFORMATION	
Company ID #	85	Contact Name	Pamela Gibbs
Company Name	Xcel Energy	Contact Title	Regulatory Case Specialist
Street Address Line 1	414 Nicollet Mall	Contact Telephone	612-330-2889
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City	Minneapolis	COMMENTS/NOTES	
State	MN		
Zip Code	55401		

Filing for RENEWABLE ENERGY STANDARDS on behalf of:			
Utility Name	Utility Name	Utility Name	Utility Name
Northern States Power Company - Minnesota			

Filing for GREEN PRICING PROGRAMS on behalf of:			
Utility Name	Utility Name	Utility Name	Utility Name
Northern States Power Company - Minnesota			

Minnesota Public Utilities Commission: Docket No. E999/PR-19-12		Reporting Period: January 1, 2018 - December 31, 2018	
Minnesota Department of Commerce: Docket No. E999/PR-02-1240			
Total Retail Sales to Minnesota Customers and Renewable Energy Certificates Required to be Retired for RENEWABLE ENERGY STANDARD Compliance			
Retail Sales Total		30,442,386	
RES Percentage Obligation		25%	
RECs Required to be Retired		7,610,597	
Actual RECs Retired		7,610,597	
<div style="border: 1px solid black; padding: 2px; display: inline-block;"> Enter current reporting year data. </div>			
Utility ID #	Utility	Retail Sales Amount (MWh)	Notes
85	Xcel Energy (NSP-MN)	30,442,386	

Minnesota Public Utilities Commission: Docket No. E999/PR-19-12	Reporting Period: January 1, 2018 - December 31, 2018
Minnesota Department of Commerce: Docket No. E999/PR-02-1240	
GREEN PRICING Program Sales	

TOTAL GREEN PRICING Sales (MWh)	339,766
RECS retired for GREEN PRICING programs	339,766

List the cumulative retail sales of green pricing electricity, including utility-managed community solar, and the number of customers as of December 31, 2018.						
Utility ID # (on Worksheet 1)	Utility Name	Program Name	No. of Program Customers	Program Sales (MWh)	Retail Rate (\$/kWh)	Notes
85	Xcel Energy (NSP-MN)	Windsorce Minnesota	55,047	189,427	\$0.03530	
85	Xcel Energy (NSP-MN)	Renewable * Connect	1,546	11,505	\$0.03577	2018 Month-to-Month Rate
85	Xcel Energy (NSP-MN)	Renewable * Connect	1,153	35,671	\$0.03280	2018 5-year rate
85	Xcel Energy (NSP-MN)	Renewable * Connect	667	92,284	\$0.03230	2018 10-year rate
85	Xcel Energy (NSP-MN)	Renewable * Connect Government	1	10,879	\$0.03130	2018 Rate
85	Xcel Energy (NSP-MN)	Community Solar Gardens		0		No sales since company receives all RECs and subscribers do not get CSG energy

Minnesota Public Utilities Commission: Docket No. E999/PR-19-12	Attachment A
Minnesota Department of Commerce: Docket No. E999/PR-02-1240	Reporting Period: January 1, 2018 - December 31, 2018
Renewable Energy Certificate Retirements for Renewable Energy Standards and Green Pricing Programs	

Renewable Energy Standard REC Retirement Account Name:	NSP-MN RES Retirement-2018 / D131622C-536C
Green Pricing REC Retirement Account Name:	NSP-MN Windsource Retirement-2018 / D74EC692-6CE5
Green Pricing REC Retirement Account Name:	MN Renewable Connect 2018 / 8A12F8E6-8281

Total RECs		7,610,597	339,766	1 REC = 1 MWh
		RECS retired for		
		RENEWABLE ENERGY STANDARD compliance		
		RECS retired for GREEN PRICING programs		
MRETS ID	MRETS Generator Facility Name	Generator Fuel Type	compliance	NOTES
M1045	Odell Wind Farm (1) - Odell Wind Farm (:	Wind		8,486 MN Renewable Connect Government 2018
M1064	North Star Solar PV - North Star Solar PV Solar			2,393 MN Renewable Connect Government 2018
M1045	Odell Wind Farm (1) - Odell Wind Farm (:	Wind		108,778 MN Renewable Connect 2018
M1064	North Star Solar PV - North Star Solar PV Solar			30,681 MN Renewable Connect 2018
M1051	Black Oak Wind, LLC - BOGWF	Wind		103,000 MN WindSource 2018 / Purchased RECS ¹
M352	Cisco Wind Energy - Cisco Wind Energy	Wind		21,618 MN WindSource 2018
M359	Rock County Energy - Rock County Energ	Wind		17,857 MN WindSource 2018
M386	K-Brink Wind Farm - K-Brink Wind Farm	Wind		5,412 MN WindSource 2018
M395	West Ridge - West Ridge	Wind		5,895 MN WindSource 2018
M432	Boeve Windfarm - Boeve Windfarm	Wind		4,851 MN WindSource 2018
M434	Windcurrent Farms - Windcurrent Farms	Wind		4,694 MN WindSource 2018
M447	McNeilus Group - McNeilus Group	Wind		17,904 MN WindSource 2018
M452	JJN Windfarm - JJN Windfarm	Wind		3,811 MN WindSource 2018
M508	Moraine II - Moraine II	Wind		4,385 MN WindSource 2019
M677	Adams - Adams Wind	Wind	57,558	
M656	Agassiz Beach - Agassiz Beach	Wind	5,300	
M277	Apple River (Unit 1)(Units 3-4) - Apple Ri	Hydroelectric Water	9,991	
M297	Bayfront (Unit 4) - Bayfront (Unit 4)	Municipal solid Waste	1,015	
M318	Bayfront (Unit 5) - Bayfront (Unit 5)	Municipal solid Waste	846	
M831	Big Blue Wind Farm - Big Blue Wind Farn	Wind	107,344	
M278	Big Falls (Units 1-3) - Big Falls	Hydroelectric Water	36,260	
M965	Border Winds Wind Farm - Border Wind	Wind	370,684	
M459	Carleton College - Carleton College	Wind	4,352	
M279	Cedar Falls (Units 1-3) - Cedar Falls	Hydroelectric Water	30,520	
M387	Chanarambie Power Partners (1) - Chana Wind		120,130	
M388	Chanarambie Power Partners (2) - Chana Wind		102,098	
M280	Chippewa Falls (Unit 1) - Chippewa Falls	Hydroelectric Water	9,864	
M320	Chippewa Falls (Unit 2) - Chippewa Falls	Hydroelectric Water	11,384	
M321	Chippewa Falls (Unit 3) - Chippewa Falls	Hydroelectric Water	21,213	
M322	Chippewa Falls (Unit 4) - Chippewa Falls	Hydroelectric Water	12,173	
M323	Chippewa Falls (Unit 5) - Chippewa Falls	Hydroelectric Water	10,152	
M324	Chippewa Falls (Unit 6) - Chippewa Falls	Hydroelectric Water	7,827	
M689	Community Wind North - North Commur Wind		42,799	
M690	Community Wind North - North Wind Tu Wind		45,058	
M707	Cornell (Unit 1-4) - Cornell (Unit 1-4)	Hydroelectric Water	80,946	
M1047	Courtenay Wind Farm - Courtenay Wind	Wind	47,501	
M872	Cow Poo - Cow Poo	Biogas	1,762	
M678	Danielson - Danielson Wind Farms	Wind	48,794	
M282	Dells (Units 1-7) - Dells	Hydroelectric Water	45,264	
M351	East Ridge - East Ridge	Wind	23,701	
M353	Ewington Energy Systems - Ewington Ene Wind		64,641	
M355	Fenton Power Partners I (1) - Fenton Pov Wind		330,211	
M356	Fenton Power Partners I (2) - Fenton Pov Wind		324,906	
M433	Fey Windfarm - Fey Windfarm	Wind	6,127	
M760	Fibrominn LLC - Fibrominn Multi	Biomass	229,771	
M366	FPL Energy Mower County - FPL Energy A Wind		253,865	
M317	French Island (Unit 1) - French Island (Un	Municipal solid Waste	16,065	

1) 55,000 RECs purchased 11/2017. 48,000 RECs purchased 1/2019. All Purchased RECs are 2018 vintage.

MRETS ID	MRETS Generator Facility Name	Generator Fuel Type	RECS retired for		NOTES
			RENEWABLE ENERGY STANDARD compliance	GREEN PRICING programs	
M274	French Island (Unit 2) - French Island (Un	Municipal solid Waste	23,802		
M742	GL Bio Gas I, LLC - GL Bio Gas I	Biogas	4,247		
M493	Grand Meadow Wind Farm - Grand Mea	Wind	272,785		
M577	Grant County Wind - Grant County Wind	Wind	65,125		
M885	GreenWhey Energy, Inc - GreenWhey En	Biogas	8,666		
M509	Hilltop Power - Hilltop	Wind	2,685		
M284	Holcombe (Unit 1) - Holcombe (Unit 1)	Hydroelectric Water	26,554		
M328	Holcombe (Unit 2) - Holcombe (Unit 2)	Hydroelectric Water	42,074		
M329	Holcombe (Unit 3) - Holcombe (Unit 3)	Hydroelectric Water	33,395		
M431	Jeffers Wind 20 - Jeffers Wind 20	Wind	141,202		
M285	Jim Falls (Unit 1) - Jim Falls (Unit 1)	Hydroelectric Water	72,799		
M519	Jim Falls (Unit 3) - Jim Falls (Unit 3)	Hydroelectric Water	1,440		
M430	Jim Falls (Units 2) - Jim Falls (Units 2)	Hydroelectric Water	73,341		
M635	Kas Brothers Windfarm - Kas Brothers W	Wind	3,879		
M286	Ladysmith (Units 1-3) - Ladysmith	Hydroelectric Water	10,862		
M639	Lake Benton Power Partners II (LBII) - LB	Wind	282,170		
M728	Lake Benton Power Partners, LLC - Lake E	Wind	224,578		
M758	LCO Band of Lake Superior Chippewa Ind	Hydroelectric Water	10,492		
M447	McNeilus Group - McNeilus Group	Wind	68,067		
M287	Menomonie (Units 1-2) - Menomonie	Hydroelectric Water	22,316		
M681	Metro Wind - Metro Wind	Wind	876		
M390	MinnDakota Wind (1) - MinnDakota Win	Wind	188,076		
M732	MinnDakota Wind (1b) - MinnDakota Wi	Wind	181,339		
M391	MinnDakota Wind (2) - MinnDakota Win	Wind	135,163		
M508	Moraine II - Moraine II	Wind	143,638		
M392	Moraine Wind - Moraine Wind	Wind	128,818		
M606	Neshonoc - Neshonoc	Hydroelectric Water	1,476		
M643	Nobles Wind Farm - Nobles Wind Farm I	Wind	213,552		
M646	Nobles Wind Farm - Nobles Wind Farm II	Wind	247,798		
M393	Norgaard North - Norgaard North	Wind	12,966		
M394	Norgaard South - Norgaard South	Wind	10,189		
M657	North Shaokatan Wind - Group	Wind	32,392		
M1045	Odell Wind Farm (1) - Odell Wind Farm (Wind	180,217		
M1046	Odell Wind Farm (2) - Odell Wind Farm (Wind	149,006		
M636	Olsen Windfarm LLC - Olsen Windfarm	Wind	2,638		
M694	Pine Bend - Pine Bend	Biogas	7,390		
M363	Pipestone - Pipestone	Wind	21,782		
M966	Pleasant Valley Wind Farm - Pleasant Val	Wind	674,613		
M791	Prairie Rose Wind - Prairie Rose Wind, LL	Wind	615,441		
M642	Ridgewind - Ridgewind	Wind	81,046		
M288	Riverdale (Units 1-2) - Riverdale	Hydroelectric Water	2,078		
M359	Rock County Energy - Rock County Energ	Wind	287		
M362	Rock Ridge Power Partners - Rock Ridge I	Wind	7,266		
M658	Ruthton Ridge Wind - Group	Wind	50,520		
M706	SAF Hydro, LLC - SAF Hydro	Hydroelectric Water	42,899		
M289	Saxon Falls (Units 1-2) - Saxon Falls	Hydroelectric Water	9,735		
M389	Shane's Wind Machine - Shane's Wind M	Wind	7,571		
M364	South Ridge Power Partners - South Ridg	Wind	7,252		
M291	St. Anthony (Units 1-5) - St. Anthony	Hydroelectric Water	49,842		
M711	St. Croix Falls (Unit 1-8) - St. Croix Falls (L	Hydroelectric Water	96,277		
M368	St. Olaf College - St. Olaf College	Wind	2,867		
M292	Superior Falls (Units 1-2) - Superior Falls	Hydroelectric Water	10,396		
M396	Tholen Transmission Inc. (North) - Tholer	Wind	30,433		
M397	Tholen Transmission Inc. (South) - Tholer	Wind	15,366		
M293	Thornapple (Units 1-2) - Thornapple	Hydroelectric Water	8,022		
M294	Trego (Units 1-2) - Trego	Hydroelectric Water	7,810		
M561	Uilk Wind Farm - Uilk Wind Farm	Wind	14,371		
M683	Valley View - Valley View Wind	Wind	27,254		
M453	Velva Windfarm - Velva Windfarm	Wind	28,730		
M395	West Ridge - West Ridge	Wind	561		
M897	Western Technical College - Western Tec	Hydroelectric Water	833		
M295	White River (Units 1-2) - White River	Hydroelectric Water	3,971		

MRETS ID	MRETS Generator Facility Name	Generator Fuel Type	RECS retired for		NOTES
			RENEWABLE ENERGY STANDARD compliance	GREEN PRICING programs	
M638	Wind Power Partners - Wind Power Parti	Wind	25,288		
M365	Windvest Power Partners - Windvest Pov	Wind	7,080		
M721	Winona County Wind - Winona County V	Wind	94		
M712	Wissota (Unit 1-3) - Wissota (Unit 1-3)	Hydroelectric Water	72,732		
M713	Wissota (Unit 4-6) - Wissota (Unit 4-6)	Hydroelectric Water	60,912		
M626	Woodstock Municipal Wind - Woodstock	Wind	2,272		
M802	Zephyr Wind, LLC (CWS) - Zephyr Wind (Wind	54,703		
M792	Zephyr Wind, LLC (CWS) - Zephyr Wind (:	Wind	64,158		

1. Description

The Certified Renewable Percentage (CRP) is a voluntary Renewable Energy Certificate (REC)¹ accounting protocol that is intended to give Xcel Energy retail electric customers clarity regarding renewable energy claims associated with standard electrical service.

2. The Certified Renewable Percentage Formula

The formula for calculating the Certified Renewable Percentage in Minnesota is:

Certified Renewable Percentage (Minnesota) =

$$\frac{\text{Total RE generation attributable to MN (MWh)} - \text{Trade margin adjustment} - (\text{REC sales} + \text{Windsource}^{\circledR} \text{ RECs} + \text{Renewable*Connect RECs} + \text{Wholesale REC transfers}) + \text{Purchased RECs}}{\text{Total MN retail sales (MWh)} - (\text{Windsource}^{\circledR} \text{ sales} + \text{Renewable*Connect sales}) + (\text{Solar*Rewards generation})}$$

This methodology is designed to attribute the appropriate number of RECs to retail customers and retire these RECs on their behalf. All of the inputs in the above equation reflect the calendar year of the CRP calculation.

3. Interactions with the Minnesota Renewable Energy Standard (RES)

Under Minn. Stat. § 216B.1691 electric utilities are required to retire RECs to demonstrate compliance with the requirement to generate or procure a specified percent of total retail electric sales from eligible energy technologies. RECs retired for compliance with the RES are included in the CRP. Consistent with the December 18, 2007 Commission *Order Establishing Initial Protocols for Trading Renewable Energy Credits*, RECs can be used during the year of generation and during the four years following the year of generation toward RES compliance. The Company will continue to retire RECs within this range of vintages toward RES compliance.

Given the adjustments in the CRP equation, it is possible for the CRP to be less than, equal to, or greater than the RES requirement. If the CRP is less than or equal to the RES requirement, RECs will be retired consistent with compliance requirements, and

¹ One REC is issued for every one MWh of electricity generated and delivered to the electric grid from a renewable energy resource.

the CRP that is reported will represent the percentage of electrical usage that retail customers can claim as renewable. Over time, as Xcel Energy continues to add renewable energy to its portfolio beyond RES requirements, it is likely the CRP will be greater than the RES requirement. In that case, additional RECs will be retired above and beyond those required for RES compliance such that total REC retirements reflect the CRP. The additional RECs that are retired will be of current-year vintage (e.g., for the 2018 CRP, any additional RECs retired on behalf of all customers in excess of the RES requirement will be of 2018 vintage).

4. Definitions

In applying the formula presented in Section 2, we employ the following definitions:

Total RE generation attributable to MN (MWh) – The portion of renewable energy (as defined in Minn. Stat. § 216B.2422, subd. 1(c)) generation for which Northern States Power (NSP) receives RECs and that is allocated to Minnesota.

Trade margin adjustment – Total renewable energy generation attributable to MN (MWh) multiplied by the ratio of NSP trade margin sales over Total NSP electricity sales (MWh). This adjustment is included in the CRP to withhold RECs proportional to trade margin sales as a fraction of total sales in order to avoid preferentially assigning fossil generation to the wholesale market. Trade margin sales generally represent energy trades into the wholesale markets outside of an existing long-term contract. Trade margin sales do not include any sales to retail customers whether residential, commercial or industrial, nor sales under long-term agreements to wholesale requirements customers. They are tracked as “Sales for Resale” under Account 447 in the Federal Energy Regulatory Commission’s Uniform System of Accounts Prescribed for Public Utilities and Licensees Subject to the Provisions of the Federal Power Act. This account includes the net billing for electricity supplied to other electric utilities or to public authorities for resale purposes.

The trade margin adjustment is expressed as:

Trade margin adjustment = Total MN RE generation * (NSP Trade margin sales / Total NSP electric sales)

REC sales – Sales of any bundled or unbundled RECs on a spot basis.

Windsor® and Renewable*Connect RECs – RECs retired specifically on behalf of customers participating in Windsor or Renewable*Connect. These are customer choice programs that retire RECs on behalf of specific groups of customers who participate in these programs. The RECs associated with these programs cannot

be attributed to all customers and are therefore subtracted from the numerator of the CRP calculation. This term also includes any RECs that are purchased from outside the NSP system—and subsequently retired—in support of these programs.

Wholesale REC transfers – RECs that are transferred as part of long-term agreements to wholesale requirements customers and therefore cannot be attributed to retail customers.²

Purchased RECs – While Windsource and Renewable*Connect are designed to be supported by specific resources, there are times when a portion of the program is supported by RECs purchased from outside of the NSP system. For example, in the proposed new offerings of Renewable*Connect, there is a “R*C Bridge” that allows customers to have RECs purchased and retired on their behalf during a limited period of time when new resources are under construction. These purchased RECs are added to the numerator but are also subtracted out as part of the “Windsource and Renewable*Connect RECs” term described above.

Total Minnesota retail sales – “Total retail electric sales,” as defined in Minn. Stat. § 216B.1691, subd. 1, made by NSP to Minnesota retail customers. REC retirements under the CRP substantiate a claim regarding the delivery or end use of renewable electricity, so the denominator of the CRP is structured around retail sales of electricity. This framework aligns with the Minnesota RES and voluntary renewable accounting. The Minnesota RES requirement is defined as a percentage of retail sales, and any customers voluntarily procuring renewable energy (or standalone RECs) make that procurement relative to their total usage.

Windsource and Renewable*Connect sales – Sales of energy specifically made to customers of Windsource and Renewable*Connect. Just as RECs retired with these voluntary renewable energy programs are subtracted from the CRP numerator, these sales are subtracted from the denominator.

Solar*Rewards Generation – Generation from Solar*Rewards participants in Minnesota for which RECs are owned by NSP. Solar*Rewards participants receive an incentive to designate NSP as the owner of the RECs from the participating generating unit(s), and they are allowed to net meter their generation. Therefore, to

² Currently, there are no wholesale contracts that would fall into this category, but we include this term in the methodology to reflect how wholesale REC transfers would be accounted for in the event this situation arises in the future.

accurately count their contribution toward the CRP, the net metered generation should be added back into the denominator.

5. The 2018 Certified Renewable Percentage

The table below provides the details of the CRP calculation for 2018. This calculation and the REC retirements will be subject to third party verification, with final confirmation of this 2018 CRP in the coming months.

Table 1: Summary of the preliminary CRP calculation for 2018.

[values in MWh unless otherwise noted]	
2018	
Minnesota	
MN Retail Sales (A)	30,442,386
RECs Allocated to MN in 2018	
Total MN Renewable Generation (B)	9,600,149
MN Solar*Rewards RECs/Generation (also included in total above) (C)	32,053
Adjustments	
Trade Margin Adjustment (D)	1,344,157
Wholesale REC transfers (E)	0
REC Sales (F)	23,617
Purchased RECs (for Windsource) (G)	103,000
REC Retirements and Attribution	
RES Obligation %	25%
SES Obligation %	0%
RECs retired for RES/SES compliance	7,610,597
Renewable*Connect RECs/generation and sales (H)	150,339
Total Windsource sales (includes purchased RECs and system RECs) (I)	189,427
CRP Numerator = (B-D) – (H+I+E+F) + G	7,995,609
CRP Denominator = A – (H+I) + C	30,134,673
Certified Renewable Percentage	26.5%
Additional RECs to be retired for CRP	385,013

6. Changes to the CRP Methodology

The CRP Methodology will be available publicly on the Xcel Energy website. This methodology applies to programs and treatment of RECs as they exist today. The need for changes to the methodology may arise as new programs are put into place, if

the treatment of RECs in existing programs changes in the future, and as consensus around industry best practices develops. Any changes to the methodology will be reflected in publicly-available materials and will be described in annual reporting on the CRP.

The CRP is provided by the Company on a voluntary basis. In the event of modifications to existing policies, the enactment of new policies related to renewable energy generation, or other circumstances that would impact our ability to offer the CRP, the Company may modify the CRP or stop providing the CRP in order to best position the Company for compliance.

7. Third-Party Verification

To provide assurance to customers and stakeholders that the CRP Methodology has been applied correctly and that the stated number of RECs have been retired, the Company will engage an external verifier to audit REC retirements and associated documentation. This third party will provide a verification report and an assurance statement that the Company will share publicly.

The Company will work with Lloyd's Register Quality Assurance, Inc. (LRQA) as the third-party verifier for at least the first year of the CRP. LRQA currently provides other verification services for Xcel Energy related to emissions reporting and has a well-established industry track record of providing verification services. The Company may work with different verifiers in the future.

8. Relation to other Xcel Energy Renewable Energy Programs

The CRP is designed to report the renewable energy percentage of the standard system mix of energy distributed to customers. For a customer who does not participate in any voluntary programs, the CRP is the percentage of their energy usage that they can claim is renewable. For customers wishing to go farther than the CRP, Xcel Energy is proud to offer customers a variety of ways to take voluntary action using renewable energy.

Incorporation of the CRP into a customer's renewable energy claims is optional, and their decision to do so may depend upon how their goals are structured. Customers can still participate in Xcel Energy voluntary renewable programs to offset 100 percent of their energy usage with RECs if they choose to do so. However, for

customers who wish to incorporate the CRP toward their renewable energy achievements, general guidance is provided below.

Renewable*Connect and Windsource®

Renewable*Connect and Windsource are both implemented by providing credits for fuel costs and capacity and by charging a price per kWh for participating in the program. Customers participating in Renewable*Connect and Windsource also pay base rates and other riders, including the RES rider, associated with the full amount of their electric usage. At a high level, this pricing structure is designed to clearly attribute the energy generation from specific renewable resources to participating customers, while also reflecting that the customer still relies on the overall system mix for the reliable delivery of electricity. Given this structure, we provide guidance on how the CRP complements a voluntary renewable program subscription (should the customer choose to apply the CRP toward their goals).

For the purpose of combining Renewable*Connect or Windsource with the CRP, the CRP is divided into two components described below.

- 1) *Renewable generation with costs recovered through base rates and the RES Rider:*
Renewable*Connect and Windsource participants pay these costs associated with their full usage. Therefore, that component of the CRP applies to 100% of the customer's usage and is additive with a voluntary program subscription.
- 2) *Renewable generation with costs recovered through the Fuel Clause Adjustment Rider:*
Voluntary renewable program participants are credited for the Fuel Clause Adjustment Rider. That component of the CRP applies only to the unsubscribed portion of a voluntary renewable program participant's usage.

As summarized in Table 2, in 2018 the total CRP is 26.5% with 10.6% in the first category described above and 15.9% in the second. Therefore, a customer could be 100% renewable with a voluntary program subscription for 89.4% of their usage (REC's for 100% renewable = 89.4% voluntary + 10.6% system generation). Figure 1, below, provides an example of how the CRP complements various levels of participation in a voluntary renewable program.

Table 2: Total generation from company owned wind resources for which costs are recovered through base rates or the RES rider for 2018 (as reported in Docket No. E002/M-17-818).

2018	Number of RECs	CRP
Renewable generation for which costs are recovered through base rates and RES Rider	3,221,200	10.6%
Renewable generation for which costs are recovered through the Fuel Clause Adjustment Rider	4,774,409	15.9%
Total Certified Renewable Percentage	7,995,609	26.5%

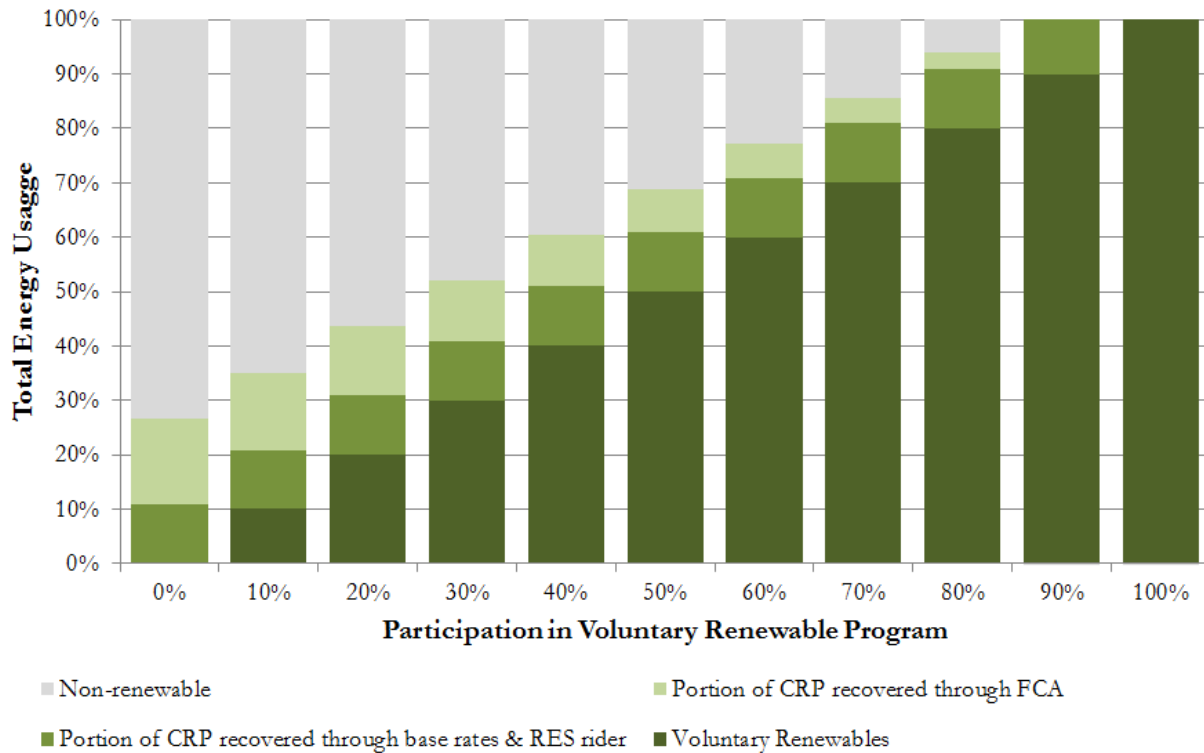


Figure 1: This chart shows the total renewable percentage a customer can claim combining a voluntary renewable program subscription with the CRP. This chart uses the preliminary 2018 CRP of 26.5 percent and renewable generation with costs recovered through base rates or the RES rider as a percentage of retail sales of 10.6 percent.

Solar*Rewards

Participants in Solar*Rewards receive an incentive payment to designate Xcel Energy as the owner of the RECs associated with their solar generation. Xcel Energy then manages these RECs on behalf of all retail customers. As a Solar*Rewards participant, a customer acts as a renewable generator, but they cannot accurately claim to be using the renewable energy they generate and deliver to the grid. Doing so would risk double-counting the value of the RECs associated with this generation.

Solar*Rewards participants can, however, claim the CRP as the portion of their usage that is renewable by being an Xcel Energy customer. They can also participate in voluntary renewable energy programs if they wish to achieve a higher percentage of renewable energy usage.

Solar*Rewards Community

Like Solar*Rewards, a portion of the bill credit received by Solar*Rewards Community subscribers is an incentive payment for the RECs associated with the generation from the solar garden. Xcel Energy receives those RECs and manages them on behalf of all retail customers. Solar*Rewards Community subscribers are participants in renewable generation through their subscription to a community solar garden, but they cannot accurately claim to be using the renewable energy the solar garden generates and delivers to the grid.

However, Solar*Rewards Community participants can claim the CRP as the portion of their usage that is renewable by being an Xcel Energy customer, and they can participate in voluntary renewable energy programs if they wish to achieve a higher percentage of renewable energy usage.

Net Metering

Customers who own their own solar generation system and net meter without participating in Solar*Rewards can claim the RECs associated with their generation. These customers can claim the entire amount of their consumption that is offset by their solar generation as 100 percent renewable. If their generation is less than their total consumption, then the CRP applies to the portion of system energy that the customers rely on to make up the difference.

It is the responsibility of the generation owner to register their generation with a REC tracking system or otherwise claim and retire the RECs associated with their generation in order to properly account for and claim the renewable energy as part of their usage, consistent with guidance from the FCC Green Guides³.

Table 3, below, summarizes REC attribution for various renewable energy options:

Generation Source	REC's owned by Xcel Energy and managed on behalf of all customers	REC's retired on behalf of or retained by specific customers
Windsorce		x
Solar*Rewards	X	
Solar*Rewards Community	X	
Net Metering		x
Renewable* Connect		x

9. My Renewable Mix Calculator Tool

To help customers understand the interactions between the CRP and the renewable energy programs described above, the Company will provide a calculator tool. Customers will be able to enter their total energy usage and their participation in various renewable energy programs. The tool will then calculate that customer's individual overall renewable percentage taking into account the CRP and any other voluntary actions they may take. The My Renewable Mix tool will help customers explore possible scenarios in future benchmark years to assist in planning.

10. Annual reporting

The Company may provide an update on the status of the Certified Renewable Percentage in the annual RES compliance filing⁴. In the current filing, the Company is

³ <https://www.ftc.gov/news-events/media-resources/truth-advertising/green-guides>

⁴ Renewable Energy Obligation (REO) - Renewable Energy Standard (RES) Compliance Report Docket Nos. E999/M-16-83,E999-PR-16-12,E999/PR-02-1240

providing a preliminary CRP for 2018. The 2018 CRP will undergo third party verification and the final 2018 CRP will be confirmed publicly on the Xcel Energy website. In subsequent RES compliance filings, the Company may provide the CRP from prior years along with the third party verification status. The Company may also provide updates on any modifications to the CRP methodology. The Company will release information pertaining to the CRP throughout the year on the Xcel Energy website.

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 Nos. E999/PR-02-1240
E999/PR-19-12**

Dated this 3rd day of June 2019

/s/

Lynnette Sweet
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Dennis	Eisenbraun	deisenbraun@mpsutility.com	Moorhead Public Service Dept. (E)	500 Center Ave PO Box 779 Moorhead, MN 56561-0779	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Susan	Mackenzie	susan.mackenzie@state.mn.us	Public Utilities Commission	121 7th Place E Ste 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
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Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	OFF_SL_2-1240_OFF_SL_2-1240_02-1240

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Richard	Burud	rgburud@msn.com	Southern Minnesota Energy Cooperative	31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_19-12_PR-19-12
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-12_PR-19-12
Curt	Dieren	curt.dieren@dgr.com	L&O Power Cooperative	1302 S Union St Rock Rapids, IA 51246	Electronic Service	No	OFF_SL_19-12_PR-19-12
Ian	Dobson	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_19-12_PR-19-12
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-12_PR-19-12
Ronald J.	Franz	rjf@dairynet.com	Dairyland Power Cooperative	3200 East Ave S PO Box 817 La Crosse, WI 546020817	Electronic Service	No	OFF_SL_19-12_PR-19-12
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	OFF_SL_19-12_PR-19-12
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	OFF_SL_19-12_PR-19-12
Brian	Krambeer	bkrambeer@tec.coop	Tri-County Electric Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Paper Service	No	OFF_SL_19-12_PR-19-12

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Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_19-12_PR-19-12
John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company	104 S. Pine St. Grantsburg, WI 54840	Electronic Service	No	OFF_SL_19-12_PR-19-12
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_19-12_PR-19-12
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_19-12_PR-19-12
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_19-12_PR-19-12
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-12_PR-19-12
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-12_PR-19-12

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Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company	215 S Cascade St Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-12_PR-19-12
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_19-12_PR-19-12