



414 Nicollet Mall
Minneapolis, MN 55401

February 1, 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
LIGHTING TARIFF REVISIONS TO INCLUDE LED OPTIONS
DOCKET NO. E002/M-18-729

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits this Reply to the January 22, 2019 Comments of the Minnesota Department of Commerce, Division of Energy Resources in the above-referenced docket.

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 Rebecca Eilers at rebecca.d.eilers@xcelenergy.com or 612-330-5570, or me at lisa.r.peterson@xcelenergy.com or 612-330-7681 if you have any questions regarding this filing.

Sincerely,

/s/

LISA R. PETERSON
MANAGER, REGULATORY ANALYSIS

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF A PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF REVISIONS TO
LIGHTING TARIFFS TO INCLUDE LIGHT
EMITTING DIODE (LED) OPTIONS

DOCKET No. E002/M-18-729

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to the January 22, 2019 Comments of the Minnesota Department of Commerce – Division of Energy Resources regarding our proposed tariff revisions to accommodate additional offerings of Light Emitting Diode (LED) lighting technology for street lighting and protective lighting applications and to close the Street Lighting Service – City of St. Paul tariff. We appreciate the Department’s thorough review of our proposal and address the Department’s request for additional information below.

REPLY COMMENTS

A. Issues Identified in the 2015 Rate Case

The Department requested that our Reply Comments address concerns raised by the Suburban Rate Authority (SRA) and the City of Minneapolis in our last electric rate case (Docket No. E002/GR-15-826) regarding LED street lighting. It is worth noting that the SRA posted no objection to the Company’s Miscellaneous LED filing in E002/M-15-920 and the Company is not aware of any SRA objections in this docket. The Company’s understanding is the concerns were specific to the treatment of capital costs in the Company’s electric rate case and therefore we do not expect those concerns to be relevant in this docket. In addition, and as discussed in our response to discovery from the Department, the Street Lighting Energy Service (rate

code A32) tariff included in the Company's Petition is an energy-only lighting service that does not include any street lighting facilities provided by the Company. This A32 lighting service was not addressed or included in the Company's Settlement in the 2015 rate case. In addition, the Department noted that the settlement only addressed the costs associated with Company-provided street lighting facilities that were considered in Docket No. E002/M-15-920 for Street Lighting System Service (rate code A30).

B. Cost Differences Between Automatic Protective Lighting (APL) Service (A07) and System Street Lighting Service (A30) Rates

The Department requested that we comment on cost differences between the peak, transmission and distribution costs values used for APL (A07) and Street Lighting System Service (A30) calculations. These cost differences relate to a timing difference of available cost information. A30 costs are from our 2013 rate case (Docket No. E002/GR-13-868), which were used in our petition in Docket No. E002/M-15-920 that was filed prior to our 2015 rate case (Docket No. E002/GR-15-826). The A07 APL costs are from the 2015 rate case.

C. Automatic Protective Lighting (A07) - Incremental Capital Costs and Relamp Savings

Attachment A to this Reply provides an updated calculation of incremental capital costs reflecting a pre-tax rate of return of 7.00 percent, as requested by the Department. The impact of lowering the pre-tax rate from 7.08 to 7.00 percent is a decrease in APL base rates of \$0.01 per month. While we have provided this information as requested, we continue to support a 7.08 percent tax rate as proposed in our Petition. The Company's calculation of the 7.08 percent rate is consistent with the 9.20 percent return on equity which is stated in the Stipulation of Settlement filed and approved in Docket No. E002/GR-15-826 at the bottom of page 6.

The Department stated they were unclear why the Company did not include any relamping savings for APL. For context, the Company included a Relamp Saving component in its pricing for Street Lighting System Service (A30). That saving component was based on the cost of the relamp program for the A30 service through a programmatic replacement effort to promote cost efficiency (relamp savings). In addition, the Company proposed to install the LEDs *en masse* prior to the lamps needing to be replaced, thus expediting the installation of the LED streetlights. However, the Automatic Protective Lighting proposal in this petition is different in that lamps are typically replaced after the HPS lamp has failed. The Company's

proposal includes installing the LED fixture when the HPS lamp fails as well. Thus, for Automatic Protective Lighting Service, we expect to install the LED fixtures over a 0 to 6 year period. As such, we do not expect any substantial incremental lamp replacement saving in the next five to six years. At that time, we expect most, if not all, of the A07 fixtures to be converted to LED, and therefore we expect Company costs to reflect the all of the saving associated with LED lighting. Therefore including a relamp saving in the A07 rates is premature at this time and unnecessary in the future.

D. City of St. Paul Lighting

The Company confirms that a Company representative notified the Public Works division of the City of St. Paul of our proposal to close the Street Lighting Service – City of St. Paul (rate code A37) tariff to new lights. We also note that a representative of the City of St. Paul was informed of the proposal at the time we submitted our Petition through their inclusion on the Company’s accompanying miscellaneous service list.

We acknowledge that a transition from a closed A37 rate to other lighting services would require the installation of meters. However, this is consistent with our standard A32 Street Lighting Energy Service tariff that is limited to existing lighting systems. In the Company’s 2011 electric rate case (Docket No. E002/GR-10-971) the Commission approved our proposal to close the unmetered flat rate version of A32 energy-only lighting service to new lighting units to more precisely track energy usage variations according to the number and type of lamps. Metered service became required for new energy-only lighting systems. Closing the A37 St. Paul rate will help transition from our only city-specific tariff and provide the same lighting options that are available to other cities. The City of St. Paul is aware of the metering requirement for new energy-only lighting installations established in 2012, as some City lighting has already transitioned from the A37 tariff. As noted in our Petition, the City has reduced the number of A37 lighting units over the last ten years from about 2,400 lighting units to under 1,700 lighting units.

The City of St. Paul has not requested to install any LED lights on the A37 tariff because they install metered lighting systems and convert them to LED as they do street upgrades each year. The City pays for the new lights and underground electric infrastructure and Xcel Energy installs a meter when their work is completed and inspected. The affected lighting is then transferred to the Street Lighting Energy Service-Metered (rate code A34) tariff, and the City owns, operates and maintains the lighting system.

E. Street Lighting Energy Service (A32)

1. Proposed Rates

The Department recommended adjustments to reduce proposed LED base rates for the Street Lighting Energy Service (A32) tariff. This recommendation would reduce our opportunity to meet our authorized lighting revenue requirement without a corresponding cost reduction. Because the Company's non-fuel costs will not be reduced, the level of our proposed rates are appropriate as a transitional rate level until all related issues can be reviewed and considered in our next electric rate case. However, fuel cost charges associated with the proposed A32 base rates for LED lighting would be reduced to recognize reduced energy usage.

2. 200W Equivalent Lamp Option

The Department recommended adding a 200W equivalent LED lamp option to the A32 Street Lighting Energy Service tariff. Based on the following considerations, we do not believe this addition is necessary or appropriate. Since more energy efficient LED technology reduces lighting wattage requirements, the range of lighting wattages is correspondingly decreased. A benefit of this narrowed wattage range is the opportunity to provide a comparable choice of illumination levels with smaller number of separate wattage-based rates. As lights have transitioned to LED under other lighting tariffs, the 200W equivalent lamps have been primarily converted to 150W High Pressure Sodium (HPS) equivalent lamps. Currently, only 3 percent of A32 tariff lamps are 200W HPS. By not adding an additional LED equivalent to 200W HPS rate, the flat rate energy-only A32 lighting tariff could be simplified. Customers also have the metered energy-only lighting tariff option for service to any lighting type or wattage.

CONCLUSION

We respectfully request that the Commission approve our Petition for Approval of Revisions to Lighting Tariffs to Include Light Emitting Diode (LED) Options as supplemented by these Reply Comments.

Dated: February 1, 2019

Northern States Power Company

Levelized Annual Revenue Requirement Percentage Calculation
LED Automatic Protective Lighting Investment

Capital Structure	Rate	Ratio	Pre-tax		After-Tax																													
			Weighted Cost	Weighted Cost	Weighted Cost	Weighted Cost																												
Long Term Debt	4.7500%	45.8100%	2.1760%																															
Short Term Debt	4.3100%	1.8900%	0.0730%																															
Preferred Stock	0.0000%	0.0000%	0.0000%																															
Common Equity	9.0580%	52.5000%	4.7520%																															
Required Rate of Return			7.9200%	6.3500%																														
<p>This version of the LARR was requested by the Department of Commerce and does not support the Company's petition.</p>																																		
<p>MN Composite Tax rate 28.74%</p> <p>Book Life 29</p> <p>ITC Rate 0%</p> <p>20 Yr MACRS 100.00%</p> <p>Capital Investment \$ 1,000,000</p> <p>Net Salvage 35.0%</p>																																		
Totals	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30				
Plant In-service																																		
BoY	-	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000				
EoY	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000				
Average	500,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000	500,000			
Depreciation Reserve																																		
BoY	0	23,276	69,828	116,379	162,931	209,483	256,034	302,586	349,138	395,690	442,241	488,793	535,345	581,897	628,448	675,000	721,552	768,103	814,655	861,207	907,759	954,310	1,000,862	1,047,414	1,093,966	1,140,517	1,187,069	1,233,621	1,280,172	1,326,724				
EoY	23,276	69,828	116,379	162,931	209,483	256,034	302,586	349,138	395,690	442,241	488,793	535,345	581,897	628,448	675,000	721,552	768,103	814,655	861,207	907,759	954,310	1,000,862	1,047,414	1,093,966	1,140,517	1,187,069	1,233,621	1,280,172	1,326,724	-				
Average	11,638	46,552	93,103	139,655	186,207	232,759	279,310	325,862	372,414	418,966	465,517	512,069	558,621	605,172	651,724	698,276	744,828	791,379	837,931	884,483	931,034	977,586	1,024,138	1,070,690	1,117,241	1,163,793	1,210,345	1,256,897	1,303,448	663,362				
Accumulated Deferred Taxes																																		
BoY	0	4,088	11,456	17,267	21,641	24,681	26,491	27,160	26,778	26,222	25,664	25,109	24,551	23,996	23,438	22,883	22,325	21,770	21,212	20,656	20,098	13,131	(248)	(13,627)	(27,006)	(40,386)	(53,764)	(67,143)	(80,522)	(93,901)				
EoY	4,088	11,456	17,267	21,641	24,681	26,491	27,160	26,778	26,222	25,664	25,109	24,551	23,996	23,438	22,883	22,325	21,770	21,212	20,656	20,098	13,131	(248)	(13,627)	(27,006)	(40,386)	(53,764)	(67,143)	(80,522)	(93,901)	-				
Average	2,044	7,772	14,362	19,454	23,161	25,586	26,826	26,969	26,500	25,943	25,387	24,830	24,274	23,717	23,160	22,604	22,047	21,491	20,934	20,377	16,615	6,442	(6,937)	(20,316)	(33,695)	(47,074)	(60,453)	(73,832)	(87,211)	(46,950)				
Average Rate Base	486,318	945,676	892,535	840,891	790,632	741,655	693,864	647,169	601,086	555,091	509,096	463,101	417,106	371,111	325,115	279,120	233,125	187,130	141,135	95,140	52,351	15,972	(17,201)	(50,373)	(83,548)	(116,719)	(149,892)	(183,064)	(216,237)	(116,412)				
Debt Return	10,937	21,268	20,073	18,912	17,781	16,680	15,605	14,555	13,518	12,484	11,450	10,415	9,381	8,346	7,312	6,277	5,243	4,209	3,174	2,140	1,177	359	(387)	(1,133)	(1,879)	(2,625)	(3,371)	(4,117)	(4,863)	(2,618)				
Equity Return	23,124	44,967	42,440	39,994	37,595	35,266	32,993	30,773	28,592	26,395	24,208	22,020	19,833	17,646	15,459	13,272	11,085	8,898	6,711	4,524	2,469	759	(818)	(2,395)	(3,973)	(5,550)	(7,127)	(8,705)	(10,282)	(5,535)				
Book Depreciation	1,350,000	23,276	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552			
20 Yr MACRS Tax Depr	1,000,000	37,500	72,190	66,770	61,770	57,130	52,850	48,880	45,220	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610	44,610			
Removal Costs	350,000																																	
SL for Deferred	1,350,000	23,276	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552	46,552			
Deferred Taxes	-	4,088	7,368	5,811	4,374	3,040	1,810	669	(383)	(555)	(558)	(555)	(558)	(555)	(558)	(555)	(558)	(555)	(558)	(555)	(558)	(555)	(558)	(555)	(558)	(555)	(558)	(555)	(558)	(555)				
Not Deferred ITC	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
O&M (input by year)	-	-	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900	11,900				
Property Taxes (input by year)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
Current Tax R	5,238	10,767	11,066	11,301	12,122	12,413	12,637	12,794	12,962	11,203	10,318	9,439	8,564	7,675	6,790	5,911	5,026	4,147	3,262	2,383	1,791	13,685	13,049	12,413	11,777	11,141	10,504	9,868	9,232	(96,133)				
Total Revenue Requirements	66,664	142,823	136,061	133,474	128,990	124,620	120,357	116,191	112,079	107,976	103,872	99,768	95,665	91,561	87,458	83,354	79,251	75,147	71,043	66,940	63,122	59,877	56,917	53,958	50,998	48,038	45,079	42,119	39,160	24,730				
NPV Rev Req	\$ 1,309,241	62,684	126,276	114,795	104,339	94,813	86,132	78,218	71,002	64,400	58,338	52,770	47,659	42,970	38,671	34,732	31,126	27,827	24,811	22,055	19,540	17,326	15,454	13,813	12,313	10,942	9,692	8,552	7,513	6,568	3,910			
LARR	\$ 99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892	99.892				
LARR%	9.989%																																	

Total to collect from customers \$ 1,309,241
 Annual ongoing charge \$ 99,892

CERTIFICATE OF SERVICE

I, Lynnette Sweet, 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-18-729

Dated this 1st day of February 2019

/s/

Lynnette Sweet

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