March 31, 2020

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. E002/M-20-180 and E002/GR-15-826

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

2019 Annual Report, Xcel Electric Revenue Decoupling Pilot Program.

The Application was filed on January 31, 2029 by:

Lisa R. Peterson
Manager, Regulatory Analysis
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve Xcel's 2019 Annual Decoupling Report, including the revenue decoupling mechanism factors that Xcel calculated for implementation April 1, 2020 through March 31, 2021**. The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ CHRISTOPHER T. DAVIS
Analyst Coordinator

CTD/ja
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket Nos. E002/M-20-180 and E002/GR-15-826

I. INTRODUCTION

On May 8, 2015, the Minnesota Public Utilities Commission (the Commission) issued its *Findings of Fact, Conclusions and Order (2013 Rate Case Order)* in Northern States Power Company d/b/a Xcel Energy's 2013 Rate Case (Docket No. E002/GR-13-868).

As part of this *Rate Case Order*, the Commission authorized Xcel to conduct a full decoupling program[1] on a pilot basis for three years (aka Revenue Decoupling Mechanism or RDM) under Minnesota Statute § 216B.2412, subd.1. Full decoupling means that Xcel's actual sales are not adjusted to reflect sales under normal weather (or any other factor); instead, the level of actual, unadjusted sales for any given year is compared to the level of sales approved in the most recent rate case.

Order Point 40 e. of the Commission's May 8, 2015 Order required Xcel to submit an annual report to the Commission by February 1 of each year prior to any application of an RDM adjustment factor on April 1. The Commission's Order stated that the report shall include the following information:

i. Total over- or under-collection of allowed revenues by customer class or group;
ii. Total collection of prior deferred revenue;
iii. Calculations of the RDM deferral amounts;
iv. The number of customer complaints;
v. The amount of revenues stabilized and how the stabilization impacted Xcel's overall risk profile;
vi. A comparison of how revenues under traditional regulation would have differed from those collected under partial and full decoupling;
vii. A description of all new and existing demand-side-management programs and other conservation initiatives Xcel had in effect for the year covered by the report;
viii. A description of the effectiveness of all new and existing demand-side management programs and other conservation initiatives Xcel had in effect for the year covered by the report; and
ix. Other factors that may have contributed to a decline in energy consumption, including weather and the economy.

[1] "Full decoupling" means that the effects of weather are included in subsequent decoupling rate refunds or surcharges, whereas "partial decoupling" excludes the effects of weather on decoupling rate adjustments.

On August 31, 2015 the Commission issued its *Order Reopening, Clarifying, and Supplementing May 8, 2015 Order* (2015 Clarifying Order).

The 2015 Clarifying Order affirmed the decisions of the Commission's May 8, 2015 Order regarding the RDM's implementation. Further, Order points 7 and 8 of the 2015 Clarifying Order stated:

> 7. Xcel shall set the baseline fixed revenue per customer and baseline fixed energy charges using the authorized revenues from whatever rates are in place, be that final rates from this rate case (if Xcel decides not to file another rate case) or final rates from a future rate case (if Xcel files a rate case for 2016).
>
> 8. Xcel shall implement revenue decoupling according to the following schedule:
>   - 2016, January – December: Measure 2016 decoupling deferrals
>   - 2017, January – December: Measure 2017 decoupling deferrals
>   - 2017, after new rates approved: Implement 2016 decoupling adjustments
>   - 2018, January – December: Measure 2018 decoupling deferrals
>   - 2018, April 1: Implement 2017 decoupling adjustments
>   - 2019, April 1: Implement 2018 decoupling adjustments
>   - 2020: True-up balance

On February 1, 2017, Xcel submitted its 2016 Decoupling Annual Report (2016 Report). The 2016 Report stated:

> …the first year of the RDM is unique in that it relies on outcomes from our currently pending rate case (Docket No. E002/GR-15-826) to set the baseline, which will not be available until later this year. We therefore use information from the record of our pending case to illustrate the potential impacts of the RDM on the decoupling classes in this first Annual Report.

Xcel stated that it would submit the final RDM adjustments for approval in its final rates compliance filing in Docket E002/GR-15-826 (2015 Rate Case).

On July 12, 2017, Xcel submitted its *Final Rates Compliance* in its 2015 Rate Case. The compliance included Schedule 10 concerning decoupling programs, which showed the revenue decoupling model results for 2016, and Schedule 10B, which showed the revenue decoupling monthly baseline Fixed Revenue per Customer (FRC) and baseline Fixed Energy Charge (FEC) by class for 2017.[2]

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[2] The RDM factors are based on Xcel's 2016 actual, weather-normalized test year sales and customer counts, and 2017 rates from the 2015 rate case proceeding.

The Commission's September 29, 2017 *Order Approving Compliance Filing with Modifications* (September 2017 Order) approved the sales figures in Xcel's July 12, 2017 Final Rates compliance filing in Docket No. E002/GR-15-826.

On February 15, 2018, the Commission accepted Xcel's 2016 Annual Decoupling Report and approved Xcel's calculation of its October 2017-March 2018 RDM Factors as shown in Table 1 below.

Table 1: Calculation of Xcel's October 2017-March 2018 RDM Factors

	Residential Without Space Heating	Residential	Small General Service (non-demand)
2016 Under/(Over) Collection	($2,577,473)	$936,992	($128,650)
October 2017-March 2018 Forecasted Sales	3,971,452,212	260,289,792	442,436,664
RDM Factor Surcharge/(Refund)	($0.000649)	$0.003600	($0.000291)

On February 1, 2018, Xcel submitted its Annual Decoupling Report for 2017. Table 2 below shows Xcel's calculation of the Company's April 1, 2018-March 31, 2019 RDM Factors.

Table 2: Xcel's Approved April 2018-March 2019 RDM Factors

	Residential Without Space Heating	Residential	Small C&I (non-demand)	Total
2017 Under/(Over) Collection	$25,047,593	$933,610	$1,088,400	$27,069,603
Carry Over Balance	($18,995)	($13,466)	$3,738	($28,723)
Total	$25,028,598	$920,144	$1,092,138	$27,040,880
April 2018-March 2019 Sales*	8,168,639,281	389,796,446	877,087,737	NA
RDM Factor Surcharge/(Refund)	($0.003064)	($0.002361)	($0.001245)	NA

As shown in Table 2, Xcel's 2018/2019 RDM factors were based on its undercollection of funds in 2017, carryover from its October 2017-March 2018 RDM Factor implementation, and forecasted sales for April 1, 2018-March 31, 2019. Xcel's RDM calculations resulted in an approximate overall $27.1 million of undercollection due to a cooler than normal summer and warmer than normal winter.[3]

On June 25, 2019, the Commission accepted Xcel's 2018 Annual Decoupling Report and approved Xcel's RDM Factors for April 1, 2019-March 31, 2020 as shown in Table 3 below.

Table 3: Calculation of Xcel's April 2019-March 2020 RDM Factors

	Residential Without Space Heating	Residential	Small C&I (non-demand)	Total
Under/(Over) Collection	($12,542,022)	($290,755)	($184,588)	($13,017,365)
Carry Over Balance	($684,676)	($139,710)	$166	($824,220)
Total	($13,226,698)	($430,465)	($184,422)	($13,841,585)
April 2019-March 2020 Sales*	8,137,868,546	407,767,340	864,133,606	NA
RDM Factor Surcharge/(Refund)	($0.001625)	($0.001056)	($0.000213)	NA

As shown in Table 3 above, Xcel's April 1, 2019-March 31, 2020 RDM Factors were based on the Company's 2018 overcollection of funds, carryover from its April 2018-March 2019 RDM Factor implementation, and forecasted sales for April 1, 2019-March 31, 2020.

On January 31, 2020 Xcel submitted its 2019 Report. Table 4 below shows Xcel's April 1, 2020-March 31, 2021 RDM Factors, based on the Company's 2019 undercollection of funds, carryover from its April 2019-March 2020 RDM Factor implementation, and forecasted sales for April 1, 2020-March 31, 2021.

Table 4: Xcel's Calculation of its April 2020-March 2021 RDM Factors

	Residential *Without* Space Heating	Residential With Space Heating	Small C&I (non-demand)
Under(Over) Collection	$25,578,172	$267,689	$2,451,228
Carry Over Balance	($1,209,070)	($65,248)	($52,288)
Total	$24,369,102	$202,441	$2,398,940
April 2020-March 2021 Sales*	7,941,316,397	395,009,621	841,882,676
RDM Factor	($0.003069)	($0.000512)	($0.002849)

Table 5 below shows Xcel's total RDM deferrals from January 1, 2016 through December 31, 2019.

Table 5: Xcel's RDM Deferrals for January 1, 2016-December 31, 2019

	Under/(Over) Collection			
Year	**Residential Without Space Heating**	**Residential With Space Heating**	**Small C&I (non-demand)**	**Total**
2016	($2,577,473)	$936,992	($128,650)	($1,769,131)
2017	$25,047,593	$933,610	$1,088,400	$27,069,603
2018	($12,542,022)	($290,755)	($184,588)	($13,017,365)
2019	$25,578,172	$267,689	$2,451,228	$28,297,089
Total	**$35,506,270**	**$1,847,536**	**$3,226,390**	**$40,580,196**

As can be seen in Table 5, thus far Xcel's RDM has resulted in net surcharges of $40.6 million over four years for the Company's three decoupled customer classes, for an average annual surcharge of $10.1 million. The shaded areas above indicate the years in which the Company encountered its cap on surcharges.[3] Without the surcharge cap, Xcel's three decoupled customer classes would have been surcharged $3,142,105 more over the four-year period, representing approximately 8%[4] of Xcel's net 2016-2019 surcharges. In other words, if the cap had not been in place, Xcel's three decoupled classes would have been surcharged a total of $43,722,301.

II. DEPARTMENT ANALYSIS

A. OVERVIEW

The purpose behind Xcel's RDM Rider is to eliminate the Company's throughput incentive and thus eliminate any Company disincentive to encourage its customers to invest in energy savings. Under its RDM Rider, Xcel is allowed to recover its authorized revenues for non-fuel costs, regardless of causes in variation (including weather, changes in economic factors, etc.), up to the approved revenue cap. Xcel's RDM Rider applies to the Company's residential non- space heating, residential space heating, and small commercial and industrial customers that do not pay a demand charge.

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[3] Per the Commission's May 8, 2015 Order in Docket No. E002/GR-13-868, the Company may petition to recover costs that were excluded from recovery due to the cap by demonstrating that DSM programs and other Company initiatives were a substantial contributing factor to the declining sales triggering the cap. The cap is set at 3 percent of a customer class' revenues, excluding fuel and riders. These revenues include the impact of the revenue reductions due to the Tax Cuts and Jobs Act, as approved by the PUC in their May 10, 2019 Order in Docket No. E999/CI-17-895.

[4] Calculated as $3,142,105/$40,580,196*100 = 8 percent (rounded).

Xcel calculates the total test year authorized revenue requirement amount by using the test year energy charges, excluding Xcel's fuel clause or other riders, multiplied by test year sales for the corresponding customer group. Each month, Xcel calculates the RDM deferral for a customer group as the difference between the monthly baseline revenue and the revenue collected under the volumetric rates from those customers. Every 12 months, Xcel incorporates the cumulative deferral (over or under recovery) for each customer group into customer rates for the following year by dividing the deferral amount by the forecast of sales to that customer group.

In any year in which Xcel fails to achieve energy savings equal to 1.2 percent of retail sales, Xcel forgoes the opportunity to make an upward rate adjustment via the RDM in the following year. Xcel's RDM has a cap on surcharges equal to three percent of customer class revenues, excluding revenues from the fuel clause and other riders. In any year in which the RDM would authorize an upward adjustment to recover more than three percent of a customer group's base revenues (excluding consideration of Xcel's fuel clause or other riders), Xcel may implement a three percent adjustment. Xcel may also petition to use the following year's decoupling adjustment to recover costs excluded from recovery by this cap. In its petition, Xcel must demonstrate that Xcel's demand-side- management programs and other Company initiatives were a substantial contributing factor to the declining energy sales triggering the rate adjustment, and that other non-conservation factors were not the primary factors for the declining sales.

The Department's analysis of Xcel's 2019 Annual Report includes a review of:

1. Xcel's ability to surcharge customers for 2019 deferrals;
2. Xcel's compliance with Commission required reporting requirements;
3. Xcel's 2019 Conservation Improvement Program (CIP) achievements;
4. Xcel's calculation of its deferrals for 2019; and
5. Xcel's discussion of regulatory policy changes that may help the State meet its greenhouse gas reduction goals.

The Department discusses each of these issues below.

B. XCEL'S ABILITY TO SURCHARGE CUSTOMERS

Order Point 40 c. of the Commission's May 8, 2015 Order in Docket No. E002/GR-13-868 states, in part:

> In any year in which Xcel fails to achieve energy savings equal to 1.2 percent of retail sales, Xcel will forgo the opportunity to make an upward rate adjustment via the revenue decoupling mechanism in the following year.

In its current filing, Xcel stated that preliminary results from its 2019 CIP portfolio showed energy savings of 530 million kWh, approximately 1.84 percent of retail sales. Although Xcel's 2019 CIP Status Report is not due until April 1, 2020 and thus the Department has not evaluated it, the Department believes it is reasonable to assume that the final accounting of 2019 energy savings will be greater than 1.2 percent of Xcel Electric's revenues. Thus, Xcel has met this requirement to allow the Company to surcharge its applicable customers through its RDM Rider beginning April 1, 2020.

B. XCEL'S REPORTING REQUIREMENTS

The Commission's Orders established annual report requirements[5] that Xcel addressed beginning on page 6 of its 2019 Report. The Department concludes that Xcel complied with its annual decoupling report filing requirements.

C. XCEL'S 2019 ENERGY SAVINGS

The comments for the instant docket are due April 1, 2020, but Xcel is not scheduled to submit the status report for the Company's 2019 CIP activities until May 1, 2020. Thus, the Department is unable to submit in these comments a comparison of the Company's 2019 achievements to Xcel's energy savings for the years preceding Xcel's decoupling, 2013-2015[6]. Instead, the Department repeats its energy savings analysis from last year, with data through 2018.

The Department requests that Xcel update the Department's analysis by including 2019 CIP achievements in this docket when they are available. At a minimum, the Department recommends that Xcel compare its 2019 energy savings achievements to its pre-decoupling (2013-2015) energy savings achievements.

Minnesota Statutes § 216B.241, Subdivision 3 states:

> Subd. 3. **Pilot programs.** The commission shall allow one or more rate-regulated utilities to participate in a pilot program to assess the merits of a rate-decoupling strategy to promote energy efficiency and conservation. Each pilot program must utilize the criteria and standards established in subdivision 2 and be designed to determine whether a rate-decoupling strategy achieves energy savings. On or before a date established by the commission, the commission shall require electric and gas utilities that intend to implement a decoupling program to file a decoupling pilot plan, which shall be approved or approved as modified by the commission. A pilot program may not exceed three years in length. Any extension beyond three years can only be approved in a general rate case, unless that decoupling

[5] See Order Point 40 e requirements, numbers i through ix above, from Docket No. E002/GR-13-868.

[6] As noted above, Xcel's preliminary estimate of 2019 energy savings is 530 million kWh, approximately 20 percent lower than the Company's 2018 CIP annual first-year energy savings.

> program was previously approved as part of a general rate case. The commission shall report on the programs annually to the chairs of the house of representatives and senate committees with primary jurisdiction over energy policy.

The Department brings particular attention to the sentence in Subd. 3, which states, "Each pilot program must utilize the criteria and standards established in subdivision 2 and be designed to determine whether a rate-decoupling strategy achieves energy savings."

Xcel's RDM Rider applies to the Company's Residential and non-demand-metered Small General Service schedules, excluding rates for lighting and electric vehicle services. Below in Table 6 the Department compares Xcel's 2018 (the third year of its RDM Rider deferral) CIP achievements, with the three years of the Company's pre-decoupling achievements. Table 6 and Figures 1 and 2 below show CIP achievements for the residential (including low-income) customer class and the business customer class (including the Center for Energy and Environment's (CEE) One-Stop Efficiency Shop).

Table 6: Xcel's 2018 CIP Achievements
Compared to Pre-Decoupling (2013-2015) CIP Achievements

	Business	Residential	Total
2013	326,172,990	167,072,321	493,245,311
2014	342,313,567	136,265,278	478,578,845
2015	326,406,491	173,987,045	500,393,536
2013-2015 Average	331,631,016	159,108,215	490,739,231
2016	359,412,589	191,286,634	550,699,223
2017	463,172,254	192,898,330	656,070,584
2018	478,637,852	201,810,597	680,448,449
2018 % Difference from 2013-2015 Average	44%	27%	39%
2018 % Difference from 2017	3%	5%	4%

Figure 1: Comparing Xcel's 2018 Business First-Year Energy Savings to Average Pre- Decoupling (2013-2015) Business First-Year Energy Savings

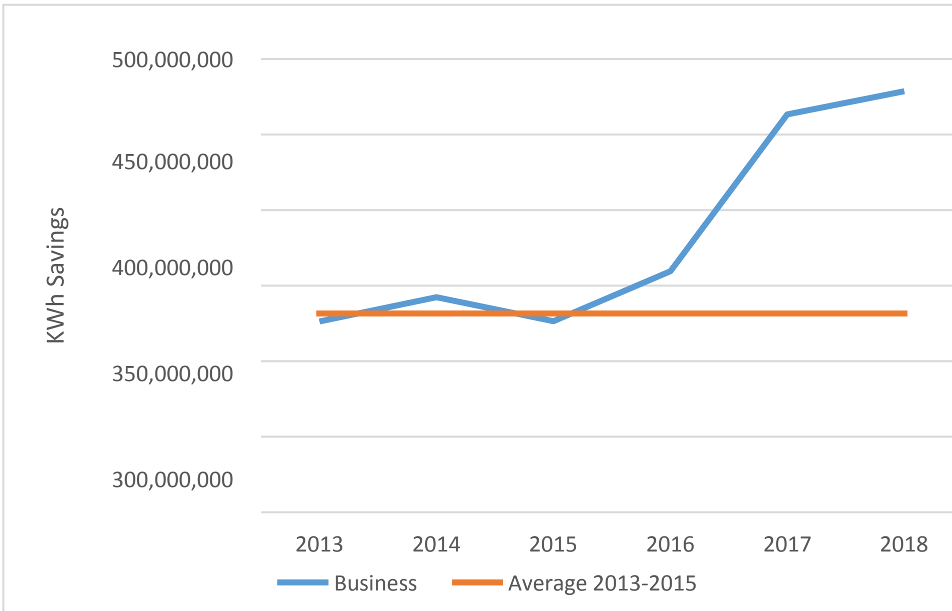
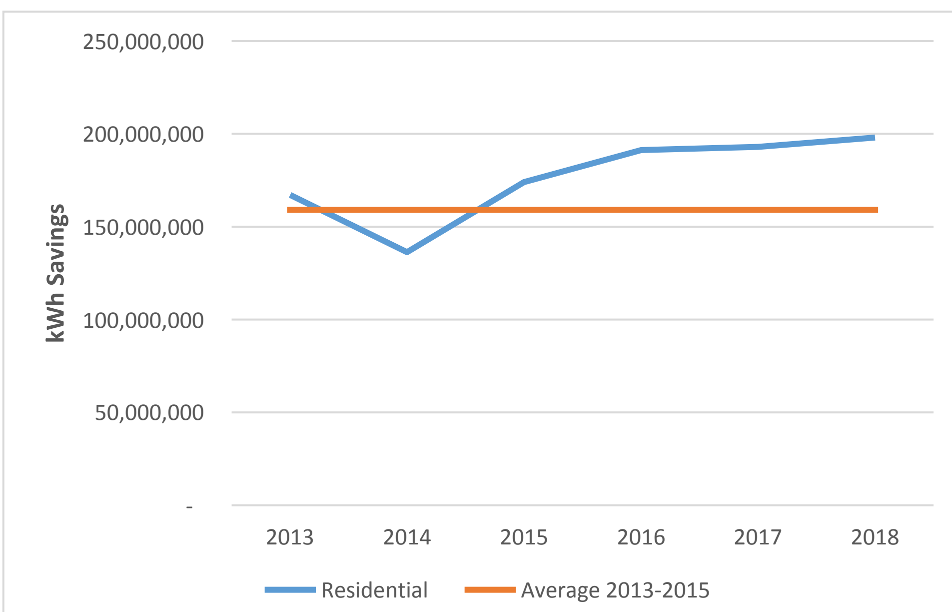


Figure 2: Comparing Xcel's 2018 Residential First-Year Energy Savings to Average Pre- Decoupling (2013-2015) Residential First-Year Energy Savings



In its 2019 Revenue Decoupling Report, Xcel did not separate CIP achievements for its non-demand-metered Small General Service customers from its much larger Business customer segment. However, a review of Table 6 and Figure 1 indicate that the Company's 2018 Business segment energy savings were 1 percent higher than the Company's 2017 Business segment savings and 41 percent higher than the average of its 2013-2015 Business segment energy savings. Xcel's 2018 Residential segment energy savings were 3 percent higher than the Company's 2017 Residential segment savings and 24 percent higher than the average of its 2013-2015 residential segment energy savings. Overall, Xcel's 2018 total energy savings were 2 percent higher than the Company's 2017 total energy savings and 36 percent higher than the average of its 2013-2015 total energy savings. Thus, energy savings in both the Business and Residential CIP portfolios have increased significantly since Xcel initiated its RDM. However, the increase in energy savings cannot be directly attributed to Xcel's decoupling pilot given that other state policies such as the Shared Savings DSM financial incentive mechanism were in place during 2018.

D. XCEL'S CALCUATION OF ITS ANNUAL RDM RIDER FACTOR

As noted above, every 12 months, Xcel incorporates the cumulative deferral (over or under recovery) for each customer group into rates for the following year by dividing the deferral amount by the forecast of sales to that customer group. Table 7 below shows Xcel's calculation of its RDM factors for implementation between April 1, 2020 and March 31, 2021.

Table 7: Xcel's Calculation of its April 2020-March 2021 RDM Factors

	Residential *Without* Space Heating	**Residential With Space Heating**	**Small C&I (non-demand)**
Under(Over) Collection	$25,578,172	$267,689	$2,451,228
Carry Over Balance	($1,209,070)	($65,248)	($52,288)
Total	$24,369,102	$202,441	$2,398,940
April 2020-March 2021 Sales	7,941,316,397	395,009,621	841,882,676
RDM Factor	($0.003069)	($0.000512)	($0.002849)

As can be seen in Table 7, Xcel calculated a surcharge for all three of its decoupled rate classes for April 1, 2020-March 31, 2021 due to an undercollection of revenues in 2019 that was much greater than the negative carryover balance. Based on our review, the Department concludes that Xcel correctly calculated its RDM factors for April 1, 2020 through March 31, 2021.

E. USING REGULATORY TOOLS TO PROMOTE COST-EFFECTIVE ELECTRIFICATION THAT REDUCES GREENHOUSE GASES

On page 17 of its 2019 Report, Xcel stated:

> To achieve the deep GHG reductions contained in statute across Minnesota's economy by 2050, it will be necessary for transportation and other sectors outside of the electric sector to also achieve CO_2 reductions. Realizing this long-term transformation in a cost-effective manner requires early, sustained and coordinated action by many parties. It is generally recognized that the electricity sector can help enable CO_2 reductions in other sectors through supporting deployment of electric vehicles (EVs) and other forms of beneficial electrification (such as building and industrial electrification)[7].

In addition, Xcel stated:

> Absent specific program and policies, utilities lack direct incentives to support market transformation and GHG savings beyond the electricity sector that are needed to meet the state's long-term climate goals. Coordination among programs within the regulatory framework will be needed to drive the transformation. This may include removal of the utility disincentive through decoupling, actively incentivizing through performance incentive mechanisms, and encouraging customer adoption through appropriate price signals, among other things.

Thus, the Department believes that a rigorous analysis of different regulatory policies and how they interact is needed to inform the discussion of how Minnesota's greenhouse gas goals can be reached at a least cost or reasonable cost basis. Going forward, the Department recommends that the analysis rigorously consider:

1. Where changes in regulatory policy may be needed, differentiating between short term and long term.
2. How different regulatory policies may interact.
3. The potential costs of the regulatory policies under a variety of future assumptions.
4. Short-term and long-term forecasts of potential changes in emissions.
5. How other states have designed regulatory policies that promote greenhouse gas reductions at a minimal cost.

[7] See page 17 of Xcel's 2019 Report.

Based on our experience with Minnesota's Shared Savings DSM Financial Incentive Mechanism (Docket No. E,G999/CI-08-133), the Department recommends that, if the Commission considers any additional financial incentives, the Commission should err on the side of caution and start with small pilots with reasonably sized incentives.

Minnesota's conservation performance incentive has been the highest in the country for years and it has been very difficult to reduce these incentives, partly due to the vested interests of the investor-owned utilities to maximize incentives for their shareholders.

Going forward, the Department recommends that the Commission consider these important lessons learned about the need for greater ratepayer protections in future proceedings regarding incentives and/or removal of disincentives regarding energy conservation.

F. FUTURE OF XCEL'S RDM

Xcel's current RDM pilot expired at the end of 2019. For 2020, the Commission approved a Sales True-Up mechanism, in Docket No. E002/M-19-688. Xcel states that it anticipates proposing an RDM in the Company's next rate case. The Department and Xcel plan to meet in the near future to discuss whether any improvements can be made to the Company's RDM pilot, if it is to continue.

G. DEPARTMENT RECOMMENDATIONS

The Department reviewed Xcel's RDM calculations and concludes that the Company correctly calculated its RDM factors for implementation April 1, 2020 through March 31, 2021. The Department recommends that the Commission approve the RDM factors shown in Table 7 above.

In addition, the Department requests that in this docket, Xcel provide a comparison of its 2019 CIP achievements to its CIP achievements in three-year decoupling period, 2013-2015, when the 2019 CIP achievements are available. At a minimum, the comparison should include comparisons at the total CIP level and at the Business and Residential portfolio levels.

/ja

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E002/M-20-180 and E002/GR-15-826

Dated this **31st** day of **March 2020**

/s/Sharon Ferguson

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