

October 31, 2018

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E002/M-18-628

Dear Mr. Wolf:

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

Petition for Approval of the Renewable Development Fund Annual Report, Tracker Account True-up, and Request New 2019 Rate Rider Factor.

The petitioner is:

Bria E. Shea  
Director, Regulatory & Strategic Analysis  
Northern States Power Company d/b/a Xcel Energy  
414 Nicollet Mall  
Minneapolis, Minnesota 55401-1993

The Department recommends **approval** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ SAMIR OUANES  
Rates Analyst

SO/ja  
Attachment

## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-18-628

#### I. SUMMARY

On October 1, 2018, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed a petition (Petition) requesting that the Minnesota Public Utilities Commission (Commission) approve the 2019 Renewable Development Fund (RDF) rate rider factor beginning January 1, 2019. The Company also requested that the Commission accept the RDF Annual Report and Tracker Account True-Up.

#### II. BACKGROUND

Under Minnesota Statute Section 216B.1645, subdivision 2, Xcel is allowed automatic recovery of expenditures related to the Company's RDF, once those expenditures have been approved by the Commission.

On June 11, 2004, the Commission issued an Order (2004 Order) changing how Xcel recovers its RDF costs.<sup>1</sup> The 2004 Order established an annual RDF tracker report with a filing date of October 1. It specified that the current RDF rate adjustment would remain in effect until the Commission establishes a new rate, with any resulting over- or under-recoveries being rolled into the rate determination for the following period.

On June 28, 2005, the Commission issued its *Order Setting Rider, Approving Contract Amendments and Process for Future Amendments, and Requiring Continued Reporting*, in Docket No. E002/M-05-109. In this Order, the Commission approved a new level for the RDF rate adjustment rider. The Commission concluded that Xcel's late payments on five RDF contracts did not jeopardize ratepayers' interests or constitute harm. With regard to the AnAerobics' project (Bid No. AB07, Cycle 1), the Commission indicated that, in an earlier decision, it had deferred a decision on the recovery of costs associated with this project to a

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<sup>1</sup> *Order Changing Inter-Jurisdictional Cost Allocations, Establishing Rate Rider, and Removing Renewable Development Fund Expenses from the Fuel Clause*, Docket No. E002/M-03-2018.

later date.<sup>2</sup> The Commission concluded that whatever further action was warranted pertaining to AnAerobics could be better addressed in the context of Docket No. E002/M-00-1583.

On January 27, 2006, the Commission issued its *Order Approving RDF Rate Rider Factor, Accepting Compliance Filing, and Requiring Filings*.<sup>3</sup> In this Order, the Commission adopted the Department's recommendation to remove the 2006 projected payments to Crown Hydro from the calculation of the rate rider, and approved the corresponding reduced level for the RDF rate adjustment rider. The Commission clarified that it understood Xcel's assurance to be that the remaining payment milestones under the Crown Hydro grant contract were all construction related and could not proceed without site control and before all needed permits are approved.

On December 15, 2006, the Commission issued an Order approving the 2007 RDF rate rider factor in Docket No. E002/M-06-1388. In this Order, the Commission adopted the Department's recommendation to remove any payment to Hilltop Power from the calculation of the 2007 RDF rate rider factor.

On December 7, 2007, the Commission issued an Order approving the 2008 RDF rate rider factor in Docket No. E002/M-07-1274.

On December 23, 2008, the Commission issued an Order approving the 2009 RDF rate rider factor in Docket No. E002/M-08-1167.

On June 2, 2010, the Commission issued its *Order Approving 2010 Renewable Development Fund Rider Factor, Requiring Compliance Filing, and Revising Calculation of Future Rider Adjustments* in Docket No. E002/M-09-1145. In this Order, the Commission adopted the Department's recommendation that the Company calculate its future RDF rate rider factors based only on known and measurable RDF expenditures. The Commission recognized that, in limited circumstances, such expenditures can include certain forecasted amounts. The Commission therefore directed the parties to work to determine an appropriate standard against which to judge what expenditures, including forecasted amounts, can be included under the umbrella of known and measurable RDF expenditures.

On March 17, 2011, the Commission issued its *Order Approving 2011 Renewable Development Fund Rider* in Docket No. E002/M-10-1054. In this Order, the Commission allowed Xcel to continue to calculate its future RDF rate rider factors based on known and measurable Renewable Development Fund expenditures, which, in limited circumstances, can include

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<sup>2</sup> Commission's August 17, 2004 Order in Docket No. E002/M-00-1583.

<sup>3</sup> *In the matter of Xcel's Petition for Approval of the Renewable Energy Development Fund Annual Report, Tracker Account True-Up, and New 2006 Rate Rider Factor*, Docket No. E002/M-05-1570.

forecasted amounts, using the criteria for “known and measurable” agreed to by Xcel and the Department. The Commission required Xcel to meet with the Department to clarify the definition and application of the five percent administrative cost cap. The Commission also denied Xcel’s request to reallocate to the Minnesota jurisdiction RDF program expenses currently allocated to the jurisdictions of North Dakota and South Dakota.

On June 6, 2011, the Commission issued its *Order after Reconsideration Modifying March 17, 2011 Order and Reallocating Expenses* in Docket No. E002/M-10-1054. In this Order, the Commission modified its March 17, 2011 Order to reallocate to Minnesota ratepayers the 2011 RDF energy production grant payments and associated administrative expenses previously allocated to North Dakota and South Dakota.

On February 17, 2012, the Commission issued its Order approving the 2012 RDF Rider in Docket No. E002/M-11-1007. In this Order, the Commission approved the proposal regarding the definition and application of the five percent administrative cost cap agreed to by Xcel and the Department. The Commission also required Xcel to identify at the time of its initial filing any actual numbers that have changed from a previous report, including a complete justification for the change.

On December 21, 2012, the Commission issued its Order approving the 2013 RDF Rider in Docket No. E002/M-12-1062. The Commission also required Xcel to enter any source data in its RDF tracker model only once as an input data, to alleviate the reoccurrence of discrepancies and inconsistencies identified by the Department in the RDF tracker account provided in the Company’s RDF petitions.

On August 8, 2013, Xcel filed a status update on the development of replacement projects for the equipment associated with the AnAerobics RDF project pursuant to the August 17, 2004 *Order Deferring Decision, Allowing Time to Develop Alternative Uses, and Requiring Consultation and Report* (2004 Order) in Docket E002/M-00-1583.

On October 2, 2013, the Department filed comments continuing to recommend disallowing rate recovery and refunding to ratepayers all amounts paid to AnAerobics, claiming the contract between Xcel and AnAerobics had been improperly amended and imprudently administered.

On January 23, 2014, the Commission issued its Order requiring Xcel to return to ratepayers the \$1.1 million paid to AnAerobics by crediting the RDF tracker account for this amount.

On January 28, 2014, Xcel filed the Commission-required refund compliance plan (Refund Plan). The Refund Plan identified the portion of the \$1.1 million that was paid by Xcel’s Minnesota ratepayers as \$811,518. Attachment B of the Refund Plan shows that the amount of \$811,518

would be subtracted from the expenses Xcel will recover from its Minnesota ratepayers in setting the 2015 RDF rates.

On September 26, 2014, Xcel filed a petition in Docket No. E002/M-14-814 requesting that the Commission approve the 2015 RDF rate rider factor and accept the RDF Annual Report and Tracker Account True-Up.

On October 27, 2014, the Department filed comments recommending approval of a reduction in Xcel's proposed 2015 RDF rate rider factor to take into account the Commission-required refund of grant payments to AnAerobics that Xcel failed to subtract from the RDF tracker account.

On December 12, 2014, the Commission issued its Order approving the 2015 RDF rate rider factor as recalculated by the Department.

On December 11, 2015, the Commission issued its Order approving the 2016 RDF rate rider factor in Docket No. E002/M-15-730.

On December 11, 2016, the Commission issued its Order approving the 2017 RDF rate rider factor in Docket No. E002/M-16-811.

On September 25, 2018, the Commission issued its Order (2018 Order) approving the Department's correction of Xcel's proposed 2018 RDF rate rider factor in Docket No. E002/M-17-712.<sup>4</sup> The Commission also required Xcel to remove the \$28,009 in administrative costs in its proposed 2018 Rider from the tracker balance.

On October 15, 2018, the Commission issued its Order in Docket No. E002/M-17-712 directing Xcel to exercise Crown Hydro grant contract termination rights.

On October 22, 2018, Xcel filed a letter to inform the Commission that the Company complied with the October 15, 2018 Order in Docket No. E002/M-17-712 with the issuance of a notice of termination to Crown Hydro in connection with the RDF grant contract on October 22, 2018.

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<sup>4</sup> Given the Company's forecast of the legislative mandates expenses to be paid out of the RDF, Xcel's original proposal (Option 1) overestimated the RDF amount to be transferred to MMB on January 15, 2018.

### III. DEPARTMENT ANALYSIS

Xcel filed its petition under Minn. Stat. § 116C.779. The statute was enacted to require Xcel, as the public utility that owns the Prairie Island and Monticello nuclear power plants, to transfer funds (in dollar amounts determined by the number of dry casks containing spent fuel at each facility), into an account that is used to support the development of various innovative energy projects, such as renewable electric energy technologies.

Currently, Xcel's RDF rate rider adjustment factor (RDF factor) is set at \$0.001318 per kWh, and is recovered through the Resource Adjustment charge, a line item on customers' bills. The level of the RDF factor is adjusted once a year to a level allowing recovery of both actual costs (using a true-up procedure) and forecasted RDF costs for known and measurable amounts.

Up to 2017, the Company's recovery did not extend to all RDF obligation amounts, let alone the amounts awarded to projects that have not met required milestones. The recovery was limited to the payments to RDF projects and legislative mandates for actual or known and measurable amounts. A true-up of expenditures and revenues is conducted annually. The remainder of obligated funds are tracked as unencumbered or as deferred payments and are not yet collected from ratepayers. This structure has been important both to ensure that ratepayers pay only for actual or known and measurable RDF costs and to hold Xcel and project owners financially accountable.

Under the 2017 legislative changes to Minn. Stat. § 116C.779, the Legislature established a new renewable development account (RDA) as a separate account to be administered by the Department of Management and Budget (MMB) and directed Xcel to transfer all funds, by July 1, 2017, from the RDF to the RDA (a one-time transfer requirement). The statute clarifies that certain funds are not subject to the transfer requirement, including "funds awarded to grantees in previous grant cycles that have not yet been expended and unencumbered funds required to be paid in calendar year 2017 under paragraphs (f) and (g) and sections 116C.7792 and 216C.41."<sup>5</sup>

In addition, Xcel is obligated to pay annually into the RDA \$500,000 for each dry cask (sealed container storing spent fuel) at the Prairie Island power plant and \$350,000 for each dry cask at the Monticello nuclear power plant and must make the required payments by January 15 each year, beginning in 2018. The statute authorizes Xcel to withhold from these payments "the amount necessary to pay its obligations under paragraphs (f) and (g) and sections 116C.7792 and 216C.41, for that calendar year."<sup>6</sup>

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<sup>5</sup> Source: <https://www.revisor.mn.gov/statutes/cite/116C.779>

<sup>6</sup> Id.

In its 2018 Order, the Commission approved the Company's proposal which reflected that "no RDF funds [were] eligible for the one-time transfer requirement from the RDF to the RDA" and Xcel's corrected calculation of the first RDA transfer payment to MMB that was to be made on January 15, 2018 (\$8,817,885).

In the instant filing, Xcel proposes a new RDF factor to recover the following costs:<sup>7</sup>

- 2019 payments made to fulfill legislative mandates (for a total 2019 RDF obligation amount of \$32.5M when including the \$13,754,134 RDA transfer payment to MMB on January 15, 2019);
- payments made to RDF grant projects in 2019 (Minnesota Jurisdictional amount of \$5,760,881);
- 2019 RDF administrative expenses (\$0); and
- true-up expenses for under-recovered costs from the 2018 RDF factor (\$3,327,404).

According to the Company, these expenses total \$41,588,284 and result in a higher RDF factor equal to \$0.001417 per kWh.<sup>8</sup> For an average residential customer, the proposed RDF factor would result in a charge of about \$1.06 per month, an increase of about \$0.07 per month from the prior level.<sup>9</sup>

To facilitate the review of the Company's tracker report activity, the Department maintains a separate RDF tracker spreadsheet and updates the information each year with the new input data provided by the Company in its annual RDF filings as summarized in the following attachments:

- **Attachment 1:** 2017 RDF Budget
- **Attachment 2:** 2018 RDF/RDA Budget
- **Attachment 3:** 2019 RDF/RDA Budget and Rate Rider Factor Calculation
- **Attachment 4:** Compliance with the Commission's Five Percent Cap on Administrative Costs
- **Attachment 5:** Actual RDF Unencumbered Cumulative Balance as of December 31, 2017
- **Attachment 6:** Forecasted RDF Unencumbered Cumulative Balance as of December 31, 2018

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<sup>7</sup> Source: Attachment 3 of the Petition.

<sup>8</sup> Id.

<sup>9</sup> Based on an average monthly consumption of 750 kWh:  $(0.001417 - 0.001318) * 750 \text{ kWh/month} = \$0.07/\text{month}$

The Department's analysis below is based on a review of Xcel's tracker report activity in 2017, 2018 and 2019, the information provided by the Company regarding the progress made by the Commission-approved RDF projects,<sup>10</sup> and the legislative mandate that requires transfer payments to the RDA administered by MMB from the RDF administered by Xcel.

The updated input data supporting Xcel's calculation of its proposed RDF factor covers the period of January 2017-August 2018 (actual data) and the period of September 2018-December 2019 (forecasted data).

*A. KNOWN AND MEASURABLE CRITERIA*

In its November 5, 2009 comments, the Department raised a concern about the use of RDF project payment forecasts, instead of actual expenditures, given the level of the surplus (over-recovery) in the RDF tracker.<sup>11</sup> The monthly cumulative balance of the RDF tracker has been negative (surplus) in the past, meaning that ratepayers paid more into the RDF tracker than Xcel actually spent. The actual cumulative surplus of the RDF tracker was about \$6 million in December 2006, \$3.8 million in December 2007, \$5.2 million in December 2008, \$3.1 million in December 2009, and \$2.9 million in December 2010.

To alleviate the overcharges due to the continuous monthly cumulative surplus balances in the Company's RDF tracker account, the Commission's March 17, 2011 Order in Docket No. E002/M-10-1054 included the following requirement:

Xcel may continue to calculate its future Renewable Development Fund rate rider factors based only on known and measurable RDF expenditures, which, in limited circumstances, can include forecasted amounts, using the criteria for "known and measurable" agreed to by Xcel and the OES [Department].

The application of these criteria (described below) appears to be working. Since March 2012, with the exception of February-March 2013, October-December 2017 and April-May 2018, the RDF tracker has not experienced a cumulative balance surplus.

As discussed further in the Petition, Xcel complied with the above requirement as follows:

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<sup>10</sup> Xcel's most recent Quarterly Status Report was filed on August 3, 2018 in Docket Nos. E002/M-00-1583, E002/M-03-1883, E002/M-07-675 and E002/M-12-1278.

<sup>11</sup> Docket No. E002/M-09-1145.

**Legislative Mandates.** The Company proposed to include the following legislative mandates as known and measurable RDF costs in 2017, 2018 and 2019:

- the Renewable Energy Production Incentive (Minn. Stat. § 216C.41), or REPI,<sup>12</sup>
- the Rebates for Solar Photovoltaic Modules (Minn. Stat. § 116C.7791), or Solar Rebates,<sup>13</sup>
- the Solar Energy Incentive Program (Minn. Stat. § 116C.7792), or Solar Incentive,<sup>14</sup>
- the “Made in Minnesota” Solar Energy Production Incentive Account (Minn. Stat. § 216C.412), or Made in Minnesota,<sup>15</sup>
- the transfer payment of \$1M to the Department of Employment and Economic Development (2017 Chapter 94, Article 1, Section 2, subdivision jj), or MN 21<sup>st</sup> Century,<sup>16</sup>
- the Solar Energy Standard Exemption (Minn. Stat. § 216B.1691, subd. 2f(f)),<sup>17</sup>
- the grant payments to the City of Benson (Minn. Stat. § 116C.779, subd. 1f),<sup>18</sup>
- the grant payments to the Laurentian Energy Authority (Minn. Stat. § 116C.779, subd. 1g),<sup>19</sup> and
- the RDA transfer payments to MMB.<sup>20</sup>

Given that these payments are mandated by law, the Department agrees with Xcel’s proposal to treat such payments as known and measurable for cost recovery purposes in 2017, 2018 and 2019.

Tables 1.1-1.3 below show the actual and forecasted RDF payments for these legislatively mandated programs.

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<sup>12</sup> Available at: <https://www.revisor.mn.gov/statutes/cite/216C.41>

<sup>13</sup> Available at: <https://www.revisor.mn.gov/statutes/cite/116C.7791>

<sup>14</sup> Available at: <https://www.revisor.mn.gov/statutes/cite/116C.7792>

<sup>15</sup> As explained in Xcel’s September 29, 2017 filing in Docket No. E002/M-17-712, the 2017 Legislation repealed Minn. Stat. § 216C.412. Xcel made its last payment of \$11,868,026 under Minn. Stat. § 216C.412 in March 2017.

<sup>16</sup> According to Attachment 6 (page 1 of 2) of the Petition, Xcel made this payment on June 2018.

<sup>17</sup> Available at: <https://www.revisor.mn.gov/statutes/cite/216B.1691>

<sup>18</sup> Available at: <https://www.revisor.mn.gov/statutes/cite/116C.779>

<sup>19</sup> *Id.*

<sup>20</sup> *Id.*

**Table 1.1**

<b>Minnesota Statutes</b>	<b>REPI 216C.41</b>	<b>Solar Rebates 116C.7791</b>	<b>Solar Incentive 116C.7792</b>	<b>Benson 116C.779 (1.f)</b>	<b>Laurentian 116C.779 (1.g)</b>
Up to 2016	\$ 90,630,456	\$ 15,460,312	\$ 645,677	\$ -	\$ -
2017	\$ 1,169,306	\$ 2,149,212	\$ 593,439	\$ -	\$ -
2018	\$ 879,966	\$ 1,671,014	\$ 690,519	\$ 4,000,000	\$ 13,600,000
2019	\$ 617,988	\$ 1,719,463	\$ 3,108,414	\$ 6,500,000	\$ 6,800,000
Up to 2019	\$ 93,297,716	\$ 21,000,001	\$ 5,038,048	\$ 10,500,000	\$ 20,400,000

**Table 1.2**

<b>Minnesota Statutes</b>	<b>Made in MN 216C.412</b>	<b>DEED MN 21st Century 2017 Ch 94 Art 1</b>	<b>SES Exemption 216B.1691</b>
Up to 2016	\$ 36,109,262	\$ -	\$ -
2017	\$ 11,868,026	\$ -	\$ -
2018	\$ -	\$ 1,000,000	\$ 77,123
2019	\$ -	\$ -	\$ -
Up to 2019	\$ 47,977,288	\$ 1,000,000	\$ 77,123

**Table 1.3**

	<b>2019</b>
1. 2019 RDF/RDA Obligation	\$ 32,500,000
2. 216C.41	\$ 617,988
3. 116C.7791	\$ 1,719,463
4. 116C.7792	\$ 3,108,414
5. Benson	\$ 6,500,000
6. Laurentian	\$ 6,800,000
7. 2019 Transfer to MMB	\$ 13,754,135
(7) = (1)-(2)-(3)-(4)-(5)-(6)	

Table 1.3 shows the calculation of the RDA transfer payment to MMB for 2019 based on the Commission-approved method.<sup>21</sup>

<sup>21</sup> Source: Table 1 of the 2018 Order.

Xcel summarized the legislatively mandated programs and corresponding amounts that can be considered known and measurable RDF expenditures. The Company described the REPI program as follows:<sup>22</sup>

Minn. Stat. §116C.779, Subd. 2. mandates that annual REPI payments up to \$10.9 million must be made available from the RDF account for qualifying projects, including up to \$9.4 million annually for electricity generated by wind energy conversion systems and up to \$1.5 million annually for on-farm biogas recovery facilities and hydroelectric facilities. The REPI program provides an incentive payment of 1.0 cents per kWh for wind projects through December 31, 2018, for biogas projects through December 31, 2015, and for hydro projects through December 31, 2021. All REPI payments for wind and biogas were completed in 2018 or prior and therefore the forecasted REPI amount relates only to hydro. Xcel Energy is in compliance with the REPI statute since the annual amounts to be included in the 2019 RDF rate rider for cost recovery are the aggregate incentive payment for qualifying hydroelectric facilities as reported or projected by the Minnesota Department of Commerce, who administers this incentive program.

Xcel's summary of the Solar Rebates program is as follows:<sup>23</sup>

Minn. Stat. §116C.7791, Subd. 5. mandated solar rebates, up to \$5.00 per watt of installed capacity for systems up to 40 kW, to be available for installations that use solar modules either manufactured or assembled in Minnesota. The statute appropriated \$21 million from the RDF at the rate of \$2 million in state fiscal year 2011, \$4 million in state fiscal year 2012, and \$5 million per year in state fiscal years 2013 through 2015. The Minnesota Bonus rebates are paid to each qualifying customer in five consecutive annual installments. The final installments are estimated to be paid in 2019. The Minnesota Bonus Solar Rebate Program was offered from 2011–2014. As of March 28, 2014, this program was fully subscribed to obligate the statutory appropriation of \$21 million. Since full subscription, no new applicants have been accepted.

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<sup>22</sup> Source: Petition at page 10 of 60.

<sup>23</sup> Source: Petition at 11 of 60.

Applications submitted prior to March 28, 2014, have been processed and honored; therefore, current disbursements from the RDA are made through existing contracts. Xcel Energy is in compliance with the statute since the annual amounts included in the RDF rate rider for cost recovery are the aggregate Minnesota Bonus rebates for qualifying solar facilities as reported or projected by the Company, as the administrator of this rebate program.

Xcel summarize the Solar Incentive program as follows:<sup>24</sup>

Minnesota's Solar Energy Standards established by Minn. Stat. §116C.7792 directed the Company to establish a solar energy incentive program to be funded in full by RDA funds. The program is to provide solar energy production incentives for solar energy systems of no more than a total nameplate capacity of 20 kW direct current. The original statute specified that the program shall be operated for five consecutive calendar years commencing in 2014. The production incentive is to be paid over the course of 10 years, commencing with the system operation. In 2017, the Minnesota Legislature approved a three year extension and appropriated a total of \$60,000,000 to the Solar Energy Incentive Program also known as Solar\*Rewards. The terms of the program remain the same with the production incentive to be paid over the course of 10 years, commencing with the system operation.

...

Xcel Energy is in compliance with the statute since the annual amounts included in the RDF rate rider for cost recovery are the aggregate Solar\*Rewards incentive payments for qualifying solar facilities as reported or projected by the Company, as the administrator of this incentive program.

Xcel provided also a summary of the Solar Energy Standard Exemption:<sup>25</sup>

The SES (Minn. Stat. § 216B.1691, subd. 2f (d)) provides an exemption from the costs of satisfying the solar standard to customers that are an iron mining extraction and processing facility, a paper mill, wood products manufacturer, sawmill, or oriented strand board manufacturer. The RDF program provides

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<sup>24</sup> Source: Petition at 11-12 of 60.

<sup>25</sup> Source: Petition at 23 of 60.

funding for various solar programs and projects that are used by the Company to satisfy the solar standard. Consequently, customers who have requested SES cost exemption and been approved will be excluded from or credited these costs in the RDF rate rider adjustment. The refunded costs will then be included for recovery in the subsequent RDF rate rider adjustment. Currently, two customers have received approval for exemption from the SES costs in the RDF rate rider effective June 1, 2017. The process for calculating, excluding, and recovering the SES costs in the RDF rate rider for customers approved for SES cost exemption was approved by Order January 1, 2018 in Docket No. E-002/M-17-425. The first refunds of 2017 SES related RDF/RDA costs were credited to the two exempt customers in March 2018 totaling \$77,123 (for the six months June 2017-December 2017). These refunded costs will be included in the present docket's 2018 costs as a separate line item.

In addition to legislative mandates, grant project payments are also considered known and measurable RDF expenditures. The following describes the types of administrative duties needed for grant contracts and other awards from the RDF.

**Grant Project Payments.** In response to the Commission's June 2, 2010 Order in Docket No. E002/M-09-1145, the Company developed specific criteria regarding whether or not certain RDF grant project payments should qualify for inclusion in the RDF forecast for cost recovery purposes.

In its November 1, 2010 comments in Docket No. E002/M-10-1054, the Department agreed with the criteria as described below since they provide for a reasonable checklist of potential areas where a project may have trouble proceeding. As a result, application of these criteria should help ensure that, rather than setting rates based on the expectation that all projects would proceed as anticipated and later removing costs for projects that had difficulty, projects would have to meet the milestones before the costs are included in rates.

The specific criteria are as follows:

1. Energy Production (EP) Projects: All of the following criteria must be met for costs to be included as known and measurable costs:
  - a. An executed RDF grant contract has been reviewed by the Department and approved by the Commission;

- b. An executed power purchase agreement (PPA) has been reviewed by the Department and approved by the Commission;
- c. Any necessary co-financing for the project has been secured;
- d. Any necessary site lease has been secured; and
- e. Actual construction activity has been initiated.

The only exception to the above list pertains to energy production projects designed for self-generation purposes. In such cases, the PPA requirement does not apply.

- 2. Research & Development (R&D) Projects: All of the following criteria must be met for costs to be included as known and measurable costs:
  - a. An executed RDF grant contract has been reviewed by the Department and approved by the Commission;
  - b. At least twelve months of project activity has been completed;
  - c. All RDF grant contract milestone requirements have been completed in a timely manner (within 21 days of the due date) during at least the past twelve months;
  - d. The project is currently within budget (plus or minus 10 percent);
  - e. No outstanding technical issues need to be resolved in order to proceed with the project in a timely manner; and
  - f. Project management stability has been demonstrated, *i.e.*, no unexpected turnover.

In Xcel's September 29, 2017 filing requesting approval of its 2018 RDF rate rider factor in Docket No. E002/M-17-712, the Company proposed to include RDF base-level administrative expenses of \$30,300 as known and measurable RDF administrative costs in 2018. These base-level administrative expenses cover an RDF grant administrator, RDF advisory group miscellaneous meeting expenses and Clean Energy States Alliance membership dues.

In its 2018 Order, the Commission required Xcel to remove \$28,009 (Minnesota Jurisdictional portion of the proposed \$30,300) in administrative costs from the tracker balance. Therefore, Xcel did not include any administrative expenses for 2018 and 2019 in its 2019 tracker balance.

The Department discusses in Section B below the cap on administrative costs set by the Commission.

*B. ADMINISTRATIVE COST CAP*

The five percent administrative cost cap was established by the Commission in its April 20, 2001 Order in Docket No. E002/M-00-1583 (*Adopting Proposal for Oversight and Operation of RDF*). The language adopted by the Commission regarding RDF administrative expenses specified that “[i]n no case may these costs exceed five percent (5%) of the fund’s total obligations.” The Commission reaffirmed the five percent cap in an October 5, 2006 Order in the same docket.

The Commission’s March 17, 2011 Order in Docket No. E002/M-10-1054 directed Xcel and the Department to meet to clarify the definition and application of the five-percent cap on administrative expenses associated with the RDF program. In addition, the Company was directed to file a proposal regarding this matter prior to, or as part of, the 2011 RDF rate rider filing.

In Docket No. E002/M-11-1007, the Commission established the calculation of the five-percent cap as follows:<sup>26</sup>

1. **Actual and Forecasted Calculation.** For informational purposes, the administrative cap percentage will be calculated based on actual and forecasted administrative expenses and grant project disbursements from 2004 to, and including, the second forecasted year in each new annual RDF rate rider filing. Total administrative costs will be divided by total grant project disbursements to compute the overall administrative cap percentage.
2. **Actual Only Calculation.** For compliance purposes, the same computation as described above will be applied but only for actual administrative expenses and grant project disbursements from 2004 to, and including, the most recent year in which actual costs have been reported.

The first computation (Actual & Forecasted) is used as an indicator regarding whether the administrative cap percentage is expected to increase or decrease going forward. The second computation (Actual Only) verifies whether the administrative cap percentage is equal to, or less than, the five percent administrative cap established by the Commission over the life of the program.

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<sup>26</sup> Source: Commission’s February 17, 2012 Order *In the Matter of a Petition for Approval of the Renewable Development Fund Annual Report, Tracker Account True-Up, and Request for New 2012 Rate Rider Factor* (Docket No. E002/M-11-1007).

The Department's calculations of administrative costs (2.9 percent for "Actual Only" up to 2017, 2.5 percent for "Actual & Forecasted" up to 2018 and 2.4 percent for "Forecasted" up to 2019) show that the RDF administrative costs are below the Commission-required five percent cap on administrative costs.<sup>27</sup>

*C. CALCULATION OF THE 2019 RDF RIDER RATE*

*1. 2017 Actual RDF Expenses*

Attachment 1 of the Petition describes the Company's 2017 RDF expenses and associated recovery, including:

- \$20,262,403 in 2017 total RDF expenses,
- \$19,827,937 in 2017 RDF expenditures allocated to the Minnesota Jurisdiction,
- \$7,578,800 in 2016 final true-up (deficit) to be recovered through the RDF Rider, and
- \$30,459,955 in 2017 RDF Rider revenues.

Based on the 2017 outcome of the Department's updated RDF tracker spreadsheet as summarized in Attachment 1 of these comments, the Department concludes that Xcel's calculations described above are generally reasonable.

*2. 2018 Actual (January-August 2018) and Forecast (September-December 2018) RDF Expenses*

Attachment 2 of the Petition describes the Company's 2018 RDF/RDA expenses and associated recovery. Actual results are reported for January to August and forecasts are reported for September to December. The 2018 RDF expenses and associated recovery include:

- \$40,237,149 in 2018 total RDF/RDA expenditures (including the 2018 RDA transfer payment to MMB of \$8,817,885),
- \$39,800,765 in 2018 RDF/RDA expenditures allocated to the Minnesota Jurisdiction,
- \$3,053,218 in 2017 final true-up (surplus) to be recovered through the RDF Rider, and
- \$33,420,143 in 2018 RDF Rider revenues.

Based on the 2018 outcome of the Department's updated RDF tracker spreadsheet as summarized in Attachment 2 of these comments, the Department concludes that Xcel's calculations described above are generally reasonable.

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<sup>27</sup> Source: Attachment 4 to these comments.

### 3. 2019 Forecast

Attachment 3 of the Petition shows that the Company forecasts total 2019 RDF expenditures to be \$38,669,032 (including the 2019 RDA transfer payment to MMB of \$13,754,135) and forecasts 2019 RDF expenditures allocated to the Minnesota Jurisdiction to be \$38,260,881. After adding \$3,327,404 in estimated under-recovered RDF expenditures at the end of 2018 to the 2019 RDF expenditures allocated to the Minnesota Jurisdiction, the Company identified an amount of \$41,588,284 to be recovered in 2019. The Company then divided this amount by the 2019 sales forecast of 29,352,915,894 kWh to arrive at an RDF rate rider factor of \$0.001417 per kWh for 2019, for an expected cumulative balance of \$0 at the end of 2019.

Based on the 2019 outcome of the Department's updated RDF tracker spreadsheet as summarized in Attachment 3 of these comments, the Department concludes that Xcel's calculations described above are reasonable.

#### D. ADMINISTRATIVE COST ALLOCATOR

The Commission's June 11, 2004 Order at point 12 stated:<sup>28</sup>

The Commission hereby approves Xcel's proposal to revise its cost allocation procedures for administrative costs to allocate the administrative costs of Category A projects to all jurisdictions on the basis of the target funding guidelines adopted for each annual funding cycle.

This decision was based on Xcel's February 9, 2004 Reply Comments in which the Company stated:

... we propose to allocate administrative costs for 2004 year based on the target funding guidelines set for the second funding cycle request for proposal... We would propose that this allocation be reviewed for reasonableness each October in the true-up filing, and adjusted if the proportion of spending among the categories changes with new RDF cycles.

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<sup>28</sup> Docket No. E002/M-03-2018.

The Department notes that Xcel revised the administrative cost allocator to allocate administrative costs based on the ratio of grant awards by project type to the total Cycle 4 grant awards. The Department concludes that Xcel's proposal is reasonable since the Company is operating under the fourth RDF cycle.

*E. COMPLIANCE FILING*

Point 5 of the June 28, 2005 Order in Docket No. E002/M-05-109 requires Xcel to include the RDF annual reporting requirements from the Commission's December 23, 2002 Order (2002 Order) as part of its annual tracker account and true-up filing.<sup>29</sup>

Point 2 of the 2002 Order requires Xcel to report for each Renewable Development Fund project:

- The total amount of money awarded from the fund for the project,
- A schedule of anticipated payments,
- The amount disbursed,
- The amounts recovered in the fuel clause,
- The amounts remaining to be recovered,
- Any adjustments to these amounts due to, for example, penalties or incentive payments provided for the terms of the proposal, and
- Any disparities between the schedule of anticipated payments and actual payments.

Point 8 of the March 17, 2011 Order in Docket No. E002/M-10-1054 (2011 Order) requires Xcel to more accurately fulfill the reporting requirements of Ordering point 3 in the Commission's 2002 Order. Specifically, point 8 of the 2011 Order requires Xcel to report the following, which Xcel has done in its filing with the data indicated below:

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<sup>29</sup> Order *Varying Rules to Permit Recovery of Renewable Development Fund Expenditures and Requiring Compliance Filing*, Docket No. E002/M-00-1583.

Category	Amounts as of December 31, 2017 <sup>30</sup>
The total liability the Company has incurred under Minnesota Statutes 116C.779	\$326,950,000
The Company's aggregate payments for approved renewable development projects and legislative mandates	\$277,860,709
The total amount recovered through the fuel clause adjustment mechanism and RDF rate rider factor for RDF costs	\$12,202,440 (Fuel Clause) \$279,164,437 (RDF Rate Rider)
The unencumbered cumulative balance remaining in the fund	\$23,267,840

The Department concludes that Xcel has complied with the requirements above.

The Department notes that its calculations under Attachment 5 of these comments show the same amounts for:

- 1) Xcel's total 2017 liability (\$326,950,000 after adding Xcel's 2017 liability of \$25,600,000 to Xcel's total 2016 liability of \$301,350,000 as provided in Docket No. E002/M-17-712),
- 2) Xcel's aggregate payments (\$277,860,707), and
- 3) the unencumbered cumulative RDF balance as of December 31, 2017 (\$23,267,842).

For informational purposes, the Department added Attachment 6 to these comments to include in the record an estimate of the unencumbered cumulative RDF balance as of December 31, 2018. Attachment 6 shows the following amounts for:

- 1) Xcel's total 2018 liability (\$358,450,000 after adding Xcel's 2018 liability of \$31,500,000 to Xcel's total 2017 liability),
- 2) Xcel's aggregate payments (\$318,097,858), which include the 2018 RDA transfer payment to MMB (\$8,817,885) and
- 3) the unencumbered cumulative RDF balance as of December 31, 2018 (\$27,742,744).

#### IV. COMPLIANCE WITH THE 2018 ORDER

The 2018 Order required the Company, as discussed below, to separately itemize RDF and RDA expenses in future filings:

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<sup>30</sup> Source: Table 6 of Xcel's October 1, 2018 filing in Docket No. E002/M-18-628.

*Company must make annual payments into the RDA based on the number of dry casks containing spent fuel at each of the Company's two nuclear power plants, minus the cost of legislative mandates. And separately, the statute directs the Company to make a one-time transfer of the RDF balance to the RDA, with the exclusion of costs previously awarded to grantees and unencumbered funds dedicated to legislative mandates that require payment in 2017.*

No party disputed the Company's calculation of its annual RDA obligation, which excludes the cost of legislative mandates. Further, no one objected to the Company's demonstration that there were no RDF funds eligible for the one-time transfer requirement from the RDF to the RDA. The Company's approach to the one-time transfer underscores the importance of honoring two key policy objectives—that funds are available for designated projects and that costs recovered are only for costs incurred.

For these reasons, the Commission will approve the Company's proposal [as corrected by the Department], Option 2 as shown in Table 2 above, including the RDA transfer payment and treatment of the unencumbered cumulative balance as of December 31, 2017. This approval includes the 2017 tracker account activity and the proposed 2018 RDF rate rider factor of \$0.001318 per kWh. *To facilitate a clear and accurate accounting of funds, the Commission will direct Xcel to separately itemize RDF and RDA expenses in future filings.*

[emphasis added in italics]

The Company identified separately the RDA transfer payments to MMB under Attachments 1-3 of the Petition. As a result, the Department concludes that Xcel complied with the above requirement of the 2018 Order.

However, for clarity of the record, the Department notes that it disagrees with Xcel's characterization that payments to fulfill the Minnesota legislative mandates are RDA-recoverable costs.<sup>31</sup> Xcel's mis-characterization does not impact the transferred amounts, but only confuses the record.

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<sup>31</sup> See Table 1 and page 9 of 60 of the Petition.

As a result of the 2017 Legislation and the 2018 Order, RDA expenses are limited to the annual RDA transfer payments to MMB. They do not include Xcel's expenses related to the Minnesota legislative mandates. As discussed above, the 2018 Order requires that the "Company must make annual payments into the RDA based on the number of dry casks containing spent fuel at each of the Company's two nuclear power plants, *minus the cost of legislative mandates.*" (emphasis added).

## **V. DEPARTMENT RECOMMENDATION**

The Department recommends approval of the Petition.

/ja

**Attachment 1: Xcel's Actual 2017 RDF Budget (page 1 of 2)**

<b>Total Expense</b>	<b>Jan-17</b>	<b>Feb-17</b>	<b>Mar-17</b>	<b>Apr-17</b>	<b>May-17</b>	<b>Jun-17</b>	<b>Jul-17</b>	<b>Aug-17</b>	<b>Sep-17</b>	<b>Oct-17</b>	<b>Nov-17</b>	<b>Dec-17</b>	<b>Total 2017</b>
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ 55,575	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Total Cat A (EP)</b>	<b>\$ 55,575</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B4	\$ 78,088	\$ -	\$ -	\$ 118,614	\$ 361,742	\$ -	\$ -	\$ 34,518	\$ -	\$ 103,029	\$ 131,023	\$ 93,075	\$ 920,089
Cat Higher Ed.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000	\$ -	\$ -	\$ -	\$ 1,000,000
<b>Total Cat B (RD)</b>	<b>\$ 78,088</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 118,614</b>	<b>\$ 361,742</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 34,518</b>	<b>\$ 1,000,000</b>	<b>\$ 103,029</b>	<b>\$ 131,023</b>	<b>\$ 93,075</b>	<b>\$ 1,920,089</b>
RDA/MMB	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779 (1.f)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779 (1.g)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ -	\$ 111,306	\$ 70,110	\$ 398,242	\$ -	\$ 93,925	\$ 373,448	\$ -	\$ 687,433	\$ 228,946	\$ 64,789	\$ 121,013	\$ 2,149,212
216C.412	\$ -	\$ -	\$ 11,868,026	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 11,868,026
116C.7792	\$ 282,941	\$ 79,204	\$ 28,900	\$ 30,270	\$ 18,308	\$ 15,093	\$ 23,789	\$ 19,710	\$ 19,361	\$ 16,061	\$ 27,944	\$ 31,859	\$ 593,439
216C.41 (REPI)	\$ 119,103	\$ 109,070	\$ 69,349	\$ 291,793	\$ 79,825	\$ 90,984	\$ 73,018	\$ 80,471	\$ 62,862	\$ 86,243	\$ 83,447	\$ 23,140	\$ 1,169,306
<b>Subtotal</b>	<b>\$ 402,044</b>	<b>\$ 299,580</b>	<b>\$ 12,036,385</b>	<b>\$ 720,305</b>	<b>\$ 98,132</b>	<b>\$ 200,002</b>	<b>\$ 470,255</b>	<b>\$ 100,181</b>	<b>\$ 769,656</b>	<b>\$ 331,250</b>	<b>\$ 176,180</b>	<b>\$ 176,012</b>	<b>\$ 15,779,982</b>
<b>Total Cost</b>	<b>\$ 535,707</b>	<b>\$ 299,580</b>	<b>\$ 12,036,385</b>	<b>\$ 838,919</b>	<b>\$ 459,874</b>	<b>\$ 200,002</b>	<b>\$ 470,255</b>	<b>\$ 659,861</b>	<b>\$ 1,769,656</b>	<b>\$ 434,279</b>	<b>\$ 307,203</b>	<b>\$ 2,233,630</b>	<b>\$ 20,245,351</b>
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Adm Costs 4	\$ 14	\$ 485	\$ -	\$ -	\$ 150	\$ 979	\$ 2,363	\$ 13,285	\$ -	\$ (225)	\$ -	\$ -	\$ 17,051
<b>Total Adm Costs</b>	<b>\$ 14</b>	<b>\$ 485</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 150</b>	<b>\$ 979</b>	<b>\$ 2,363</b>	<b>\$ 13,285</b>	<b>\$ -</b>	<b>\$ (225)</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 17,051</b>
<b>Total RDF Cost</b>	<b>\$ 535,721</b>	<b>\$ 300,065</b>	<b>\$ 12,036,385</b>	<b>\$ 838,919</b>	<b>\$ 460,024</b>	<b>\$ 200,981</b>	<b>\$ 472,619</b>	<b>\$ 673,146</b>	<b>\$ 1,769,656</b>	<b>\$ 434,054</b>	<b>\$ 307,203</b>	<b>\$ 2,233,630</b>	<b>\$ 20,262,402</b>

**Attachment 1: Xcel's Actual 2017 RDF Budget (page 2 of 2)**

MN Expense	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Total 2017
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ 46,326	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 440,020	\$ -	\$ -	\$ -	\$ -	\$ 1,625,765
Total Cat A	\$ 46,326	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 440,020	\$ -	\$ -	\$ -	\$ -	\$ 1,625,765
Total Cat B	\$ 78,088	\$ -	\$ -	\$ 118,614	\$ 361,742	\$ -	\$ -	\$ 34,518	\$ 1,000,000	\$ 103,029	\$ 131,023	\$ 93,075	\$ 1,920,089
RDA/MMB	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779 (1.f)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779 (1.g)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ -	\$ 111,306	\$ 70,110	\$ 398,242	\$ -	\$ 93,925	\$ 373,448	\$ -	\$ 687,433	\$ 228,946	\$ 64,789	\$ 121,013	\$ 2,149,212
216C.412	\$ -	\$ -	\$ 11,868,026	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 11,868,026
116C.7792	\$ 282,941	\$ 79,204	\$ 28,900	\$ 30,270	\$ 18,308	\$ 15,093	\$ 23,789	\$ 19,710	\$ 19,361	\$ 16,061	\$ 27,944	\$ 31,859	\$ 593,439
216C.41 (REPI)	\$ 119,103	\$ 109,070	\$ 69,349	\$ 291,793	\$ 79,825	\$ 90,984	\$ 73,018	\$ 80,471	\$ 62,862	\$ 86,243	\$ 83,447	\$ 23,140	\$ 1,169,306
Subtotal	\$ 402,044	\$ 299,580	\$ 12,036,385	\$ 720,305	\$ 98,132	\$ 200,002	\$ 470,255	\$ 100,181	\$ 769,656	\$ 331,250	\$ 176,180	\$ 176,012	\$ 15,779,982
Total Cost	\$ 526,458	\$ 299,580	\$ 12,036,385	\$ 838,919	\$ 459,874	\$ 200,002	\$ 470,255	\$ 574,718	\$ 1,769,656	\$ 434,279	\$ 307,203	\$ 1,894,852	\$ 19,812,182
Admin Cost	\$ 13	\$ 446	\$ -	\$ -	\$ 138	\$ 906	\$ 2,193	\$ 12,265	\$ -	\$ (207)	\$ -	\$ -	\$ 15,754
Total RDF Cost	\$ 526,471	\$ 300,026	\$ 12,036,385	\$ 838,919	\$ 460,012	\$ 200,908	\$ 472,448	\$ 586,983	\$ 1,769,656	\$ 434,072	\$ 307,203	\$ 1,894,852	\$ 19,827,936

**OVERALL 2017 RDF TRACKER**

	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Total 2017
Previous True Up	\$ 7,578,803												\$ 7,578,803
Expense	\$ 526,471	\$ 300,026	\$ 12,036,385	\$ 838,919	\$ 460,012	\$ 200,908	\$ 472,448	\$ 586,983	\$ 1,769,656	\$ 434,072	\$ 307,203	\$ 1,894,852	\$ 19,827,936
Revenue	\$ 2,656,591	\$ 2,324,468	\$ 2,605,033	\$ 2,190,291	\$ 2,344,904	\$ 2,651,406	\$ 2,794,394	\$ 2,979,242	\$ 2,576,009	\$ 2,593,815	\$ 2,285,264	\$ 2,458,540	\$ 30,459,955
Other Refund	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Project Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cumul. Balance	\$ 5,448,683	\$ 3,424,242	\$ 12,855,594	\$ 11,504,222	\$ 9,619,331	\$ 7,168,833	\$ 4,846,887	\$ 2,454,629	\$ 1,648,276	\$ (511,468)	\$ (2,489,529)	\$ (3,053,216)	\$ (3,053,216)

Input Data Source:

Xcel's instant filing and electronic copy of the October 1, 2018 filing in Docket No. E002/M-18-628.

(\*) Revenues attributable to RDF contracts, investments or expenditures under Minnesota Statute Section 216B.1645, subdivision 2(a).

**Attachment 2: Xcel's Forecasted 2018 RDF Budget (page 1 of 2)**

<b>Total Expense</b>	<b>Jan-18</b>	<b>Feb-18</b>	<b>Mar-18</b>	<b>Apr-18</b>	<b>May-18</b>	<b>Jun-18</b>	<b>Jul-18</b>	<b>Aug-18</b>	<b>Sep-18</b>	<b>Oct-18</b>	<b>Nov-18</b>	<b>Dec-18</b>	<b>Total 2018</b>
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 969,741	\$ -	\$ 1,650,000	\$ -	\$ -	\$ 2,619,741
<b>Total Cat A (EP)</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 969,741	\$ -	\$ 1,650,000	\$ -	\$ -	\$ 2,619,741
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B4	\$ -	\$ -	\$ 56,514	\$ 521,162	\$ 410,345	\$ 250,414	\$ 146,474	\$ -	\$ 402,074	\$ 799,213	\$ 71,411	\$ 404,224	\$ 3,061,831
Cat Higher Ed.	\$ -	\$ -	\$ 2,050,000	\$ -	\$ -	\$ 719,072	\$ -	\$ -	\$ 1,050,000	\$ -	\$ -	\$ -	\$ 3,819,072
<b>Total Cat B (RD)</b>	\$ -	\$ -	\$ 2,106,514	\$ 521,162	\$ 410,345	\$ 969,486	\$ 146,474	\$ -	\$ 1,452,074	\$ 799,213	\$ 71,411	\$ 404,224	\$ 6,880,903
RDA/MMB	\$ 8,817,885	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,817,885
116C.779 (1.f)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000
116C779 (1.g)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000
116C.7791	\$ -	\$ 49,770	\$ 97,296	\$ 334,657	\$ -	\$ 93,957	\$ 306,614	\$ -	\$ 325,795	\$ 187,307	\$ 126,105	\$ 149,513	\$ 1,671,014
116C.7792	\$ 519,273	\$ 53,990	\$ 10,769	\$ 9,655	\$ 11,621	\$ 17,019	\$ 9,701	\$ 26,773	\$ 3,261	\$ 847	\$ 11,847	\$ 15,763	\$ 690,519
216B.1691 (2f)	\$ -	\$ -	\$ 77,123	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 77,123
216C.41 (REPI)	\$ 61,557	\$ 64,817	\$ 74,731	\$ 53,956	\$ 135,592	\$ 46,297	\$ 60,587	\$ 64,833	\$ 79,399	\$ 79,399	\$ 79,399	\$ 79,399	\$ 879,966
<b>Subtotal</b>	\$ 9,398,715	\$ 168,577	\$ 259,919	\$ 398,268	\$ 147,213	\$ 14,757,273	\$ 4,376,902	\$ 91,606	\$ 408,455	\$ 267,553	\$ 217,351	\$ 244,675	\$ 30,736,507
<b>Total Cost</b>	\$ 9,398,715	\$ 168,577	\$ 2,366,433	\$ 919,430	\$ 557,558	\$ 15,726,759	\$ 4,523,376	\$ 1,061,347	\$ 1,860,529	\$ 2,716,766	\$ 288,762	\$ 648,899	\$ 40,237,151
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Adm Costs 4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Total Adm Costs</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Total RDF Cost</b>	\$ 9,398,715	\$ 168,577	\$ 2,366,433	\$ 919,430	\$ 557,558	\$ 15,726,759	\$ 4,523,376	\$ 1,061,347	\$ 1,860,529	\$ 2,716,766	\$ 288,762	\$ 648,899	\$ 40,237,151

**Attachment 2: Xcel's Forecasted 2018 RDF Budget (page 2 of 2)**

<b>MN Expense</b>	<b>Jan-18</b>	<b>Feb-18</b>	<b>Mar-18</b>	<b>Apr-18</b>	<b>May-18</b>	<b>Jun-18</b>	<b>Jul-18</b>	<b>Aug-18</b>	<b>Sep-18</b>	<b>Oct-18</b>	<b>Nov-18</b>	<b>Dec-18</b>	<b>Total 2018</b>
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 814,971	\$ -	\$ 1,368,386	\$ -	\$ -	\$ 2,183,358
<b>Total Cat A</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 814,971	\$ -	\$ 1,368,386	\$ -	\$ -	\$ 2,183,358
<b>Total Cat B (RD)</b>	\$ -	\$ -	\$ 2,106,514	\$ 521,162	\$ 410,345	\$ 969,486	\$ 146,474	\$ -	\$ 1,452,074	\$ 799,213	\$ 71,411	\$ 404,224	\$ 6,880,903
RDA/MMB	\$ 8,817,885	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 8,817,885
116C.779 (1.f)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 4,000,000
116C779 (1.g)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,600,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000
116C.7791	\$ -	\$ 49,770	\$ 97,296	\$ 334,657	\$ -	\$ 93,957	\$ 306,614	\$ -	\$ 325,795	\$ 187,307	\$ 126,105	\$ 149,513	\$ 1,671,014
116C.7792	\$ 519,273	\$ 53,990	\$ 10,769	\$ 9,655	\$ 11,621	\$ 17,019	\$ 9,701	\$ 26,773	\$ 3,261	\$ 847	\$ 11,847	\$ 15,763	\$ 690,519
216B.1691 (2f)	\$ -	\$ -	\$ 77,123	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 77,123
216C.41 (REPI)	\$ 61,557	\$ 64,817	\$ 74,731	\$ 53,956	\$ 135,592	\$ 46,297	\$ 60,587	\$ 64,833	\$ 79,399	\$ 79,399	\$ 79,399	\$ 79,399	\$ 879,966
<b>Subtotal</b>	\$ 9,398,715	\$ 168,577	\$ 259,919	\$ 398,268	\$ 147,213	\$ 14,757,273	\$ 4,376,902	\$ 91,606	\$ 408,455	\$ 267,553	\$ 217,351	\$ 244,675	\$ 30,736,507
<b>Total Cost</b>	\$ 9,398,715	\$ 168,577	\$ 2,366,433	\$ 919,430	\$ 557,558	\$ 15,726,759	\$ 4,523,376	\$ 906,577	\$ 1,860,529	\$ 2,435,152	\$ 288,762	\$ 648,899	\$ 39,800,768
<b>Total Adm Costs</b>	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Total RDF Cost</b>	\$ 9,398,715	\$ 168,577	\$ 2,366,433	\$ 919,430	\$ 557,558	\$ 15,726,759	\$ 4,523,376	\$ 906,577	\$ 1,860,529	\$ 2,435,152	\$ 288,762	\$ 648,899	\$ 39,800,768

**OVERALL 2018 RDF TRACKER**

	<b>Jan-18</b>	<b>Feb-18</b>	<b>Mar-18</b>	<b>Apr-18</b>	<b>May-18</b>	<b>Jun-18</b>	<b>Jul-18</b>	<b>Aug-18</b>	<b>Sep-18</b>	<b>Oct-18</b>	<b>Nov-18</b>	<b>Dec-18</b>	<b>Total 2018</b>
Previous True Up	\$(3,053,216)												\$(3,053,216)
Expense	\$ 9,398,715	\$ 168,577	\$ 2,366,433	\$ 919,430	\$ 557,558	\$ 15,726,759	\$ 4,523,376	\$ 906,577	\$ 1,860,529	\$ 2,435,152	\$ 288,762	\$ 648,899	\$ 39,800,768
Revenue	\$ 2,934,832	\$ 2,446,721	\$ 2,597,576	\$ 2,337,973	\$ 2,382,259	\$ 2,716,723	\$ 3,060,348	\$ 3,101,917	\$ 2,502,509	\$ 3,055,534	\$ 3,006,255	\$ 3,277,496	\$ 33,420,144
Other Refund	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Project Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Cumul. Balance</b>	\$ 3,410,667	\$ 1,132,523	\$ 901,380	\$ (517,163)	\$ (2,341,864)	\$ 10,668,172	\$ 12,131,200	\$ 9,935,861	\$ 9,293,881	\$ 8,673,499	\$ 5,956,005	\$ 3,327,408	\$ 3,327,408

Input Data Source:

Xcel's instant filing and electronic copy of the October 1, 2018 filing in Docket No. E002/M-18-628.

(\*) Revenues attributable to RDF contracts, investments or expenditures under Minnesota Statute Section 216B.1645, subdivision 2(a).

(\*\*) Net Expenses = Previous True Up + Expense - Other Refund - Project Revenues

**Attachment 3: Xcel's Forecasted 2019 RDF Budget (page 1 of 2)**

<b>Total Expense</b>	<b>Jan-19</b>	<b>Feb-19</b>	<b>Mar-19</b>	<b>Apr-19</b>	<b>May-19</b>	<b>Jun-19</b>	<b>Jul-19</b>	<b>Aug-19</b>	<b>Sep-19</b>	<b>Oct-19</b>	<b>Nov-19</b>	<b>Dec-19</b>	<b>Total 2019</b>
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ 917,250	\$ 239,994	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 610,890	\$ -	\$ -	\$ 610,890	\$ 2,379,024
<b>Total Cat A (EP)</b>	<b>\$ 917,250</b>	<b>\$ 239,994</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 610,890</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 610,890</b>	<b>\$ 2,379,024</b>
Cat B1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat B4	\$ 133,166	\$ 640,657	\$ 45,146	\$ 202,260	\$ 408,049	\$ 317,629	\$ 201,167	\$ 243,379	\$ 118,022	\$ 1,201,389	\$ 220,515	\$ 58,629	\$ 3,790,008
Cat Higher Ed.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Total Cat B (RD)</b>	<b>\$ 133,166</b>	<b>\$ 640,657</b>	<b>\$ 45,146</b>	<b>\$ 202,260</b>	<b>\$ 408,049</b>	<b>\$ 317,629</b>	<b>\$ 201,167</b>	<b>\$ 243,379</b>	<b>\$ 118,022</b>	<b>\$ 1,201,389</b>	<b>\$ 220,515</b>	<b>\$ 58,629</b>	<b>\$ 3,790,008</b>
RDA/MMB	\$13,754,135	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,754,135
116C.779 (1.f)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,500,000
116C.779 (1.g)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ 194,925	\$ 199,770	\$ 183,674	\$ 177,890	\$ 161,583	\$ 160,975	\$ 231,320	\$ 214,210	\$ 195,116	\$ -	\$ -	\$ -	\$ 1,719,463
116C.7792	\$ 2,937,169	\$ 53,990	\$ 10,769	\$ 9,655	\$ 11,621	\$ 17,018	\$ 9,701	\$ 26,773	\$ 3,261	\$ 847	\$ 11,847	\$ 15,763	\$ 3,108,414
216C.41 (REPI)	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 617,988
<b>Subtotal</b>	<b>\$16,937,728</b>	<b>\$ 305,259</b>	<b>\$ 245,942</b>	<b>\$ 239,044</b>	<b>\$ 224,703</b>	<b>\$ 6,729,492</b>	<b>\$ 7,092,520</b>	<b>\$ 292,482</b>	<b>\$ 249,876</b>	<b>\$ 52,346</b>	<b>\$ 63,346</b>	<b>\$ 67,262</b>	<b>\$ 32,500,000</b>
<b>Total Cost</b>	<b>\$17,988,144</b>	<b>\$ 1,185,910</b>	<b>\$ 291,088</b>	<b>\$ 441,304</b>	<b>\$ 632,752</b>	<b>\$ 7,047,121</b>	<b>\$ 7,293,687</b>	<b>\$ 535,861</b>	<b>\$ 978,788</b>	<b>\$ 1,253,735</b>	<b>\$ 283,861</b>	<b>\$ 736,781</b>	<b>\$ 38,669,032</b>
Admin Cost 1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Admin Cost 3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Adm Costs 4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Total Adm Costs</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>
<b>Total RDF Cost</b>	<b>\$17,988,144</b>	<b>\$ 1,185,910</b>	<b>\$ 291,088</b>	<b>\$ 441,304</b>	<b>\$ 632,752</b>	<b>\$ 7,047,121</b>	<b>\$ 7,293,687</b>	<b>\$ 535,861</b>	<b>\$ 978,788</b>	<b>\$ 1,253,735</b>	<b>\$ 283,861</b>	<b>\$ 736,781</b>	<b>\$ 38,669,032</b>

**Attachment 3: Xcel's Forecasted 2019 RDF Budget (page 2 of 2)**

MN Expense	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Total 2019
Cat A1	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A2	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cat A4	\$ 757,312	\$ 198,352	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 510,095	\$ -	\$ -	\$ 505,114	\$ 1,970,873
Total Cat A	\$ 757,312	\$ 198,352	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 510,095	\$ -	\$ -	\$ 505,114	\$ 1,970,873
Total Cat B (RD)	\$ 133,166	\$ 640,657	\$ 45,146	\$ 202,260	\$ 408,049	\$ 317,629	\$ 201,167	\$ 243,379	\$ 118,022	\$ 1,201,389	\$ 220,515	\$ 58,629	\$ 3,790,008
RDA/MMB	\$13,754,135	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 13,754,135
116C.779 (1.f)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,500,000
116C.779 (1.g)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 6,800,000
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.7791	\$ 194,925	\$ 199,770	\$ 183,674	\$ 177,890	\$ 161,583	\$ 160,975	\$ 231,320	\$ 214,210	\$ 195,116	\$ -	\$ -	\$ -	\$ 1,719,463
116C.7792	\$ 2,937,169	\$ 53,990	\$ 10,769	\$ 9,655	\$ 11,621	\$ 17,018	\$ 9,701	\$ 26,773	\$ 3,261	\$ 847	\$ 11,847	\$ 15,763	\$ 3,108,414
216C.41 (REPI)	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 51,499	\$ 617,988
Subtotal	\$16,937,728	\$ 305,259	\$ 245,942	\$ 239,044	\$ 224,703	\$ 6,729,492	\$ 7,092,520	\$ 292,482	\$ 249,876	\$ 52,346	\$ 63,346	\$ 67,262	\$ 32,500,000
Total Cost	\$17,828,206	\$ 1,144,268	\$ 291,088	\$ 441,304	\$ 632,752	\$ 7,047,121	\$ 7,293,687	\$ 535,861	\$ 877,993	\$ 1,253,735	\$ 283,861	\$ 631,005	\$ 38,260,881
Total Adm Costs	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total RDF Cost	\$17,828,206	\$ 1,144,268	\$ 291,088	\$ 441,304	\$ 632,752	\$ 7,047,121	\$ 7,293,687	\$ 535,861	\$ 877,993	\$ 1,253,735	\$ 283,861	\$ 631,005	\$ 38,260,881

**OVERALL 2019 RDF TRACKER**

	Jan-19	Feb-19	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	Total 2019
Previous True Up	\$ 3,327,408												\$ 3,327,408
Expense	\$17,828,206	\$ 1,144,268	\$ 291,088	\$ 441,304	\$ 632,752	\$ 7,047,121	\$ 7,293,687	\$ 535,861	\$ 877,993	\$ 1,253,735	\$ 283,861	\$ 631,005	\$ 38,260,881
Revenue	\$ 3,603,506	\$ 3,111,019	\$ 3,357,719	\$ 2,968,320	\$ 3,259,655	\$ 3,656,774	\$ 4,081,012	\$ 4,064,645	\$ 3,430,425	\$ 3,285,015	\$3,232,526	\$ 3,537,673	\$ 41,588,289
Other Refund	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Project Revenues	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Cumul. Balance	\$ 17,552,108	\$ 15,585,357	\$ 12,518,727	\$ 9,991,710	\$ 7,364,807	\$ 10,755,154	\$ 13,967,829	\$ 10,439,045	\$ 7,886,613	\$ 5,855,333	\$ 2,906,668	\$ 0	\$ -

Net Expenses** (Thousands)	\$ 41,588
MWh Sales	29,352,916
2019 Factor	0.001417

Input Data Source:

Xcel's instant filing and electronic copy of the October 1, 2018 filing in Docket No. E002/M-18-628.

(\*) Revenues attributable to RDF contracts, investments or expenditures under Minnesota Statute Section 216B.1645, subdivision 2(a).

(\*\*) Net Expenses = Previous True Up + Expense - Other Refund - Project Revenues

**Attachment 4: Compliance with the Commission's 5% Cap on Administrative Costs**

(Thousand of \$)	Actuals 2004	Actuals 2005	Actuals 2006	Actuals 2007	Actuals 2008	Actuals 2009	Actuals 2010	Actuals 2011	Actuals 2012	Actual 2013	Actual 2014	Actual 2015	Actual 2016	Actual 2017	Act/Forc 2018	Forecast 2019	Actuals 04-17	Act/Forc 04-18	Forecast 04-19
<b>1. RDF Grant Payments</b>	\$ 1,917	\$ 3,762	\$ 6,753	\$ 10,384	\$ 3,239	\$ 7,533	\$ 8,326	\$ 6,944	\$ 1,903	\$ 3,143	\$ 681	\$ 2,810	\$ 10,917	\$ 4,465	\$ 9,501	\$ 6,169	\$ 72,778	\$ 82,278	\$ 88,447
<b>2. Administrative Expenses</b>	\$ 342	\$ 135	\$ 189	\$ 432	\$ 226	\$ 118	\$ 147	\$ 140	\$ 102	\$ 178	\$ 25	\$ 16	\$ 25	\$ 17	\$ -	\$ -	\$ 2,092	\$ 2,092	\$ 2,092
<b>3. Ratio of Admin. Expenses</b>	17.9%	3.6%	2.8%	4.2%	7.0%	1.6%	1.8%	2.0%	5.3%	5.7%	3.6%	0.6%	0.2%	0.4%	0.0%	0.0%	2.9%	2.5%	2.4%

Note: (3) = (2)/(1)

**Attachment 5 (page 1 of 2)**

RDF Grant Payments, Administrative Costs, Other Legislative Mandates Expenditures, Grants Awarded and Unencumbered Cumulative Balance (UCB) as of December 31, 2017

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
<b>1. RDF Grant Payments</b>	\$ 5,782,469	\$1,917,257	\$3,761,910	\$ 6,753,409	\$10,384,215	\$ 3,238,626	\$ 7,533,073	\$ 8,326,385	\$ 6,943,768	\$ 1,902,838	\$ 3,142,993	\$ 680,843
Category A1	\$ 3,759,426	\$ 221,000	\$ 196,000	\$ 965,000	\$ 400,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Category A2	\$ -	\$ -	\$ -	\$ 400,000	\$ 3,436,360	\$ (520,000)	\$ 242,730	\$ 40,910	\$ 1,500,000	\$ -	\$ 344,175	\$ 592,355
Category A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 735,000	\$ 205,090	\$ 3,161,687	\$ 2,400,806	\$ 476,376	\$ 2,118,409	\$ -
Category A4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>a. Total Category A</b>	\$ 3,759,426	\$ 221,000	\$ 196,000	\$ 1,365,000	\$ 3,836,360	\$ 215,000	\$ 447,820	\$ 3,202,597	\$ 3,900,806	\$ 476,376	\$ 2,462,584	\$ 592,355
Category B1	\$ 2,023,043	\$1,696,257	\$1,410,663	\$ 607,119	\$ 284,012	\$ 62,748	\$ 46,619	\$ -	\$ -	\$ -	\$ -	\$ -
Category B2	\$ -	\$ -	\$ 155,247	\$ 2,781,290	\$ 4,556,661	\$ 2,470,102	\$ 939,061	\$ 201,306	\$ -	\$ 197,741	\$ 31,619	\$ -
Category B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 100,000	\$ 2,928,538	\$ 4,191,475	\$ 3,042,962	\$ 1,228,721	\$ 648,790	\$ 88,488
Category B4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Category Higher Education	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>b. Total Category B</b>	\$ 2,023,043	\$1,696,257	\$1,565,910	\$ 3,388,409	\$ 4,840,673	\$ 2,632,850	\$ 3,914,218	\$ 4,392,781	\$ 3,042,962	\$ 1,426,462	\$ 680,409	\$ 88,488
<b>c. Excelsior</b>	\$ -	\$ -	\$2,000,000	\$ 2,000,000	\$ 1,707,182	\$ 390,776	\$ 3,171,035	\$ 731,007	\$ -	\$ -	\$ -	\$ -
<b>2. Administrative Costs</b>	\$ 207,922	\$ 342,318	\$ 135,367	\$ 188,680	\$ 431,953	\$ 225,704	\$ 118,052	\$ 147,233	\$ 139,627	\$ 101,532	\$ 178,458	\$ 24,781
<b>3. Other Legis. Mandates</b>	\$10,037,785	\$1,513,010	\$4,460,425	\$ 8,015,780	\$ 9,481,846	\$16,673,693	\$16,744,988	\$15,619,529	\$14,729,047	\$13,325,940	\$ 9,531,959	\$21,460,069
Un. of Minnesota/IREE	\$10,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,500,000	\$ 5,000,000	\$ 5,000,000	\$ 2,500,000	\$ -	\$ -
216C.41 (REPI)	\$ 37,785	\$1,513,010	\$4,310,425	\$ 8,015,780	\$ 9,669,335	\$ 9,048,693	\$ 9,757,488	\$ 9,632,029	\$ 9,034,006	\$ 9,017,890	\$ 7,412,900	\$ 5,696,935
AURI Biofuel	\$ -	\$ -	\$ 150,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
MPCA Deposit	\$ -	\$ -	\$ -	\$ -	\$ (4,000,000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Next Generation Initiative	\$ -	\$ -	\$ -	\$ -	\$ 3,812,511	\$ 7,625,000	\$ 3,812,500	\$ -	\$ -	\$ -	\$ -	\$ -
REP Admin. by DOC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 675,000	\$ 987,500	\$ 312,500	\$ -	\$ -	\$ -
116C.7791 (Solar Rebates)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 382,541	\$ 1,808,051	\$ 2,119,059	\$ 3,686,335
216C.412 (Made in Minnesota)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$12,021,295
116C.7792 (Solar Incentives)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 55,503
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779, subd. 1f (City Benson)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779, subd. 1g (LEA PPA)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779, subd. 1 (RDA/MMB)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Total RDF Cost (1+2+3)</b>	\$16,028,176	\$3,772,585	\$8,357,702	\$14,957,869	\$20,298,014	\$20,138,023	\$24,396,113	\$24,093,147	\$21,812,442	\$15,330,311	\$12,853,410	\$22,165,693

**Attachment 5 (page 2 of 2)**

RDF Grant Payments, Administrative Costs, Other Legislative Mandates Expenditures, Grants Awarded and Unencumbered Cumulative Balance (UCB) as of December 31, 2017

	2015	2016	2017	Payments 2003-2017	Grant Awards	Unused Awards	Unencumbered Awards
1. RDF Grant Payments	\$ 2,809,764	\$10,917,324	\$ 4,465,369	\$ 78,560,243	\$107,066,638	\$ 2,684,944	\$ 104,381,694
Category A1	\$ -	\$ -	\$ -	\$ 5,541,426	\$ 9,302,835	\$ 200,000	\$ 9,102,835
Category A2	\$ -	\$ -	\$ -	\$ 6,036,530	\$ 7,636,530	\$ 1,600,000	\$ 6,036,530
Category A3	\$ -	\$ -	\$ -	\$ 9,097,368	\$ 9,112,402	\$ 15,034	\$ 9,097,368
Category A4	\$ 1,072,213	\$ 5,425,476	\$ 2,545,280	\$ 9,042,969	\$ 18,738,922	\$ -	\$ 18,738,922
a. Total Category A	\$ 1,072,213	\$ 5,425,476	\$ 2,545,280	\$ 29,718,293	\$ 44,790,689	\$ 1,815,034	\$ 42,975,655
Category B1	\$ -	\$ -	\$ -	\$ 6,130,461	\$ 6,247,566	\$ 117,105	\$ 6,130,461
Category B2	\$ -	\$ -	\$ -	\$ 11,333,027	\$ 11,804,466	\$ 471,439	\$ 11,333,027
Category B3	\$ 737,551	\$ -	\$ -	\$ 12,966,525	\$ 13,397,891	\$ 281,366	\$ 13,116,525
Category B4	\$ -	\$ 653,705	\$ 920,089	\$ 1,573,794	\$ 10,168,811	\$ -	\$ 10,168,811
Category Higher Education	\$ 1,000,000	\$ 4,838,143	\$ 1,000,000	\$ 6,838,143	\$ 10,657,215	\$ -	\$ 10,657,215
b. Total Category B	\$ 1,737,551	\$ 5,491,848	\$ 1,920,089	\$ 38,841,950	\$ 52,275,949	\$ 869,910	\$ 51,406,039
c. Excelsior	\$ -	\$ -	\$ -	\$ 10,000,000	\$ 10,000,000	\$ -	\$ 10,000,000
2. Administrative Costs	\$ 15,742	\$ 25,343	\$ 17,051	\$ 2,299,763			
3. Other Legis. Mandates	\$20,684,911	\$18,941,736	\$15,779,982	\$197,000,700			
Un. of Minnesota/IREE	\$ -	\$ -	\$ -	\$ 25,000,000			
216C.41 (REPI)	\$ 4,652,960	\$ 2,831,220	\$ 1,169,306	\$ 91,799,762			
AURI Biofuel	\$ -	\$ -	\$ -	\$ 150,000			
MPCA Deposit	\$ -	\$ -	\$ -	\$ (4,000,000)			
Next Generation Initiative	\$ -	\$ -	\$ -	\$ 15,250,011			
REP Admin. by DOC	\$ -	\$ -	\$ -	\$ 1,975,000			
116C.7791 (Solar Rebates)	\$ 3,950,536	\$ 3,513,790	\$ 2,149,212	\$ 17,609,524			
216C.412 (Made in Minnesota)	\$12,014,671	\$12,073,296	\$11,868,026	\$ 47,977,288			
116C.7792 (Solar Incentives)	\$ 66,743	\$ 523,430	\$ 593,439	\$ 1,239,115			
DEED	\$ -	\$ -	\$ -	\$ -			
116C.779, subd. 1f (City Benson)	\$ -	\$ -	\$ -	\$ -			
116C.779, subd. 1g (LEA PPA)	\$ -	\$ -	\$ -	\$ -			
116C.779, subd. 1 (RDA/MMB)	\$ -	\$ -	\$ -	\$ -			
	\$23,510,416	\$29,884,404	\$20,262,402	\$277,860,707			

As of December 31, 2017

1. Cumulative RDF/RDA Obligation in 1000s \$	\$ 326,950
2. Total RDF Administrative Costs Paid in 1000s \$	\$ 2,300
3. Amount of Unencumbered Awards in 1000s \$	\$ 104,382
4. Amount of Other Legislative Mandates Paid in 1000s \$	\$ 197,001
5. Unencumbered Cumulative RDF Balance	\$23,267,842
6. Cumulative RDA Balance in 1000s \$	\$ -

(5) = (1)-(2)-(3)-(4)

**Attachment 6 (page 1 of 2)**

Forecasted RDF Grant Payments, Administrative Costs, Other Legislative Mandates Expenditures, Grants Awarded and Unencumbered Cumulative Balance (UCB) as of December 31, 2018

	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
<b>1. RDF Grant Payments</b>	\$ 5,782,469	\$1,917,257	\$3,761,910	\$ 6,753,409	\$10,384,215	\$ 3,238,626	\$ 7,533,073	\$ 8,326,385	\$ 6,943,768	\$ 1,902,838	\$ 3,142,993	\$ 680,843
Category A1	\$ 3,759,426	\$ 221,000	\$ 196,000	\$ 965,000	\$ 400,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Category A2	\$ -	\$ -	\$ -	\$ 400,000	\$ 3,436,360	\$ (520,000)	\$ 242,730	\$ 40,910	\$ 1,500,000	\$ -	\$ 344,175	\$ 592,355
Category A3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 735,000	\$ 205,090	\$ 3,161,687	\$ 2,400,806	\$ 476,376	\$ 2,118,409	\$ -
Category A4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>a. Total Category A</b>	\$ 3,759,426	\$ 221,000	\$ 196,000	\$ 1,365,000	\$ 3,836,360	\$ 215,000	\$ 447,820	\$ 3,202,597	\$ 3,900,806	\$ 476,376	\$ 2,462,584	\$ 592,355
Category B1	\$ 2,023,043	\$1,696,257	\$1,410,663	\$ 607,119	\$ 284,012	\$ 62,748	\$ 46,619	\$ -	\$ -	\$ -	\$ -	\$ -
Category B2	\$ -	\$ -	\$ 155,247	\$ 2,781,290	\$ 4,556,661	\$ 2,470,102	\$ 939,061	\$ 201,306	\$ -	\$ 197,741	\$ 31,619	\$ -
Category B3	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 100,000	\$ 2,928,538	\$ 4,191,475	\$ 3,042,962	\$ 1,228,721	\$ 648,790	\$ 88,488
Category B4	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Category Higher Education	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>b. Total Category B</b>	\$ 2,023,043	\$1,696,257	\$1,565,910	\$ 3,388,409	\$ 4,840,673	\$ 2,632,850	\$ 3,914,218	\$ 4,392,781	\$ 3,042,962	\$ 1,426,462	\$ 680,409	\$ 88,488
<b>c. Excelsior</b>	\$ -	\$ -	\$2,000,000	\$ 2,000,000	\$ 1,707,182	\$ 390,776	\$ 3,171,035	\$ 731,007	\$ -	\$ -	\$ -	\$ -
<b>2. Administrative Costs</b>	\$ 207,922	\$ 342,318	\$ 135,367	\$ 188,680	\$ 431,953	\$ 225,704	\$ 118,052	\$ 147,233	\$ 139,627	\$ 101,532	\$ 178,458	\$ 24,781
<b>3. Other Legis. Mandates</b>	\$10,037,785	\$1,513,010	\$4,460,425	\$ 8,015,780	\$ 9,481,846	\$16,673,693	\$16,744,988	\$15,619,529	\$14,729,047	\$13,325,940	\$ 9,531,959	\$21,460,069
Un. of Minnesota/IREE	\$10,000,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 2,500,000	\$ 5,000,000	\$ 5,000,000	\$ 2,500,000	\$ -	\$ -
216C.41 (REPI)	\$ 37,785	\$1,513,010	\$4,310,425	\$ 8,015,780	\$ 9,669,335	\$ 9,048,693	\$ 9,757,488	\$ 9,632,029	\$ 9,034,006	\$ 9,017,890	\$ 7,412,900	\$ 5,696,935
AURI Biofuel	\$ -	\$ -	\$ 150,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
MPCA Deposit	\$ -	\$ -	\$ -	\$ -	\$ (4,000,000)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Next Generation Initiative	\$ -	\$ -	\$ -	\$ -	\$ 3,812,511	\$ 7,625,000	\$ 3,812,500	\$ -	\$ -	\$ -	\$ -	\$ -
REP Admin. by DOC	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 675,000	\$ 987,500	\$ 312,500	\$ -	\$ -	\$ -
116C.7791 (Solar Rebates)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 382,541	\$ 1,808,051	\$ 2,119,059	\$ 3,686,335
216C.412 (Made in Minnesota)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$12,021,295
116C.7792 (Solar Incentives)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 55,503
DEED	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779, subd. 1f (City Benson)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779, subd. 1g (LEA PPA)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
216B.1691 (2f)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
116C.779, subd. 1 (RDA/MMB)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Total RDF Cost (1+2+3)</b>	\$16,028,176	\$3,772,585	\$8,357,702	\$14,957,869	\$20,298,014	\$20,138,023	\$24,396,113	\$24,093,147	\$21,812,442	\$15,330,311	\$12,853,410	\$22,165,693

**Attachment 6 (page 2 of 2)**

Forecasted RDF Grant Payments, Administrative Costs, Other Legislative Mandates Expenditures, Grants Awarded and Unencumbered Cumulative Balance (UCB) as of December 31, 2018

	2015	2016	2017	2018	Payments 2003-2018	Grant Awards	Unused Awards	Unencumbered Awards
1. RDF Grant Payments	\$ 2,809,764	\$10,917,324	\$ 4,465,369	\$ 9,500,644	\$ 88,060,887	\$107,066,638	\$ 6,396,353	\$ 100,670,285
Category A1	\$ -	\$ -	\$ -	\$ -	\$ 5,541,426	\$ 9,302,835	\$ 3,761,409	\$ 5,541,426
Category A2	\$ -	\$ -	\$ -	\$ -	\$ 6,036,530	\$ 7,636,530	\$ 1,600,000	\$ 6,036,530
Category A3	\$ -	\$ -	\$ -	\$ -	\$ 9,097,368	\$ 9,112,402	\$ 15,034	\$ 9,097,368
Category A4	\$ 1,072,213	\$ 5,425,476	\$ 2,545,280	\$ 2,619,741	\$ 11,662,710	\$ 18,738,922	\$ -	\$ 18,738,922
a. Total Category A	\$ 1,072,213	\$ 5,425,476	\$ 2,545,280	\$ 2,619,741	\$ 32,338,034	\$ 44,790,689	\$ 5,376,443	\$ 39,414,246
Category B1	\$ -	\$ -	\$ -	\$ -	\$ 6,130,461	\$ 6,247,566	\$ 117,105	\$ 6,130,461
Category B2	\$ -	\$ -	\$ -	\$ -	\$ 11,333,027	\$ 11,804,466	\$ 471,439	\$ 11,333,027
Category B3	\$ 737,551	\$ -	\$ -	\$ -	\$ 12,966,525	\$ 13,397,891	\$ 431,366	\$ 12,966,525
Category B4	\$ -	\$ 653,705	\$ 920,089	\$ 3,061,831	\$ 4,635,625	\$ 10,168,811	\$ -	\$ 10,168,811
Category Higher Education	\$ 1,000,000	\$ 4,838,143	\$ 1,000,000	\$ 3,819,072	\$ 10,657,215	\$ 10,657,215	\$ -	\$ 10,657,215
b. Total Category B	\$ 1,737,551	\$ 5,491,848	\$ 1,920,089	\$ 6,880,903	\$ 45,722,853	\$ 52,275,949	\$ 1,019,910	\$ 51,256,039
c. Excelsior	\$ -	\$ -	\$ -	\$ -	\$ 10,000,000	\$ 10,000,000	\$ -	\$ 10,000,000
2. Administrative Costs	\$ 15,742	\$ 25,343	\$ 17,051	\$ -	\$ 2,299,763			
3. Other Legis. Mandates	\$20,684,911	\$18,941,736	\$15,779,982	\$30,736,507	\$227,737,207			
Un. of Minnesota/IREE	\$ -	\$ -	\$ -	\$ -	\$ 25,000,000			
216C.41 (REPI)	\$ 4,652,960	\$ 2,831,220	\$ 1,169,306	\$ 879,966	\$ 92,679,728			
AURI Biofuel	\$ -	\$ -	\$ -	\$ -	\$ 150,000			
MPCA Deposit	\$ -	\$ -	\$ -	\$ -	\$ (4,000,000)			
Next Generation Initiative	\$ -	\$ -	\$ -	\$ -	\$ 15,250,011			
REP Admin. by DOC	\$ -	\$ -	\$ -	\$ -	\$ 1,975,000			
116C.7791 (Solar Rebates)	\$ 3,950,536	\$ 3,513,790	\$ 2,149,212	\$ 1,671,014	\$ 19,280,538			
216C.412 (Made in Minnesota)	\$12,014,671	\$12,073,296	\$11,868,026	\$ -	\$ 47,977,288			
116C.7792 (Solar Incentives)	\$ 66,743	\$ 523,430	\$ 593,439	\$ 690,519	\$ 1,929,634			
DEED	\$ -	\$ -	\$ -	\$ -	\$ 1,000,000			
116C.779, subd. 1f (City Benson)	\$ -	\$ -	\$ -	\$ 4,000,000	\$ 4,000,000			
116C.779, subd. 1g (LEA PPA)	\$ -	\$ -	\$ -	\$13,600,000	\$ 13,600,000			
216B.1691 (2f)	\$ -	\$ -	\$ -	\$ 77,123	\$ 77,123			
116C.779, subd. 1 (RDA/MMB)	\$ -	\$ -	\$ -	\$ 8,817,885	\$ 8,817,885			
	\$23,510,416	\$29,884,404	\$20,262,402	\$40,237,151	\$318,097,858			

As of December 31, 2018 (Forecasted)

1. Cumulative RDF/RDA Obligation in 1000s \$	\$ 358,450
2. Total RDF Administrative Costs Paid in 1000s \$	\$ 2,300
3. Amount of Unencumbered Awards in 1000s \$	\$ 100,670
4. Amount of Other Legislative Mandates Paid in 1000s \$	\$ 227,737
5. Unencumbered Cumulative RDF Balance	\$27,742,744
6. Cumulative RDA Balance	\$ 8,817,885

(5) = (1)-(2)-(3)-(4)

## **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-18-628**

**Dated this 31<sup>st</sup> day of October 2018**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street  Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-628_M-18-628
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-628_M-18-628
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd  Eagan, MN 55121	Electronic Service	No	OFF_SL_18-628_M-18-628
Mara	Ascheman	mara.k.ascheman@xcenergy.com	Xcel Energy	414 Nicollet Mall Fl 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-628_M-18-628
Ryan	Barlow	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-628_M-18-628
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-628_M-18-628
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-628_M-18-628
Jeanne	Cochran	Jeanne.Cochran@state.mn.us	Office of Administrative Hearings	P.O. Box 64620  St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_18-628_M-18-628
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_18-628_M-18-628
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_18-628_M-18-628

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-628_M-18-628
Corey	Conover	corey.conover@minneapolismn.gov	Minneapolis City Attorney	350 S. Fifth Street City Hall, Room 210 Minneapolis, MN 554022453	Electronic Service	No	OFF_SL_18-628_M-18-628
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_18-628_M-18-628
Joseph	Dammel	joseph.dammel@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_18-628_M-18-628
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_18-628_M-18-628
John	Farrell	jfarrell@ilsr.org	Institute for Local Self-Reliance	1313 5th St SE #303  Minneapolis, MN 55414	Electronic Service	No	OFF_SL_18-628_M-18-628
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_18-628_M-18-628
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_18-628_M-18-628
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-628_M-18-628
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_18-628_M-18-628

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-628_M-18-628
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-628_M-18-628
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue  St. Paul, MN 55130	Electronic Service	No	OFF_SL_18-628_M-18-628
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_18-628_M-18-628
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street  St. Paul, MN 551012134	Electronic Service	No	OFF_SL_18-628_M-18-628
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-628_M-18-628
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-628_M-18-628
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South  Burnsville, MN 55337	Electronic Service	No	OFF_SL_18-628_M-18-628
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_18-628_M-18-628

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-628_M-18-628
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_18-628_M-18-628
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_18-628_M-18-628
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620  St. Paul, MN 551640620	Electronic Service	No	OFF_SL_18-628_M-18-628
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-628_M-18-628
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_18-628_M-18-628
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-628_M-18-628
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_18-628_M-18-628
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-628_M-18-628
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-628_M-18-628

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-628_M-18-628
Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office	1110 West Avenue  Red Wing, MN 55066	Electronic Service	No	OFF_SL_18-628_M-18-628
Jeff	Oxley	jeff.oxley@state.mn.us	Office of Administrative Hearings	600 North Robert Street  St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-628_M-18-628
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_18-628_M-18-628
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-628_M-18-628
Zeviel	Simpser	zsimpser@briggs.com	Briggs and Morgan PA	2200 IDS Center80 South Eighth Street  Minneapolis, MN 554022157	Electronic Service	No	OFF_SL_18-628_M-18-628
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-628_M-18-628
Byron E.	Starns	byron.starns@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-628_M-18-628
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-628_M-18-628

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-628_M-18-628
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-628_M-18-628
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