



414 Nicollet Mall  
Minneapolis, Minnesota 55401

June 6, 2016

—VIA ELECTRONIC FILING—

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101

RE: COMMISSION INQUIRY INTO FEES CHARGED ON QUALIFYING FACILITIES  
DOCKET NO. E999/CI-15-755

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments in the above-referenced docket regarding the Commission's inquiry into fees charged to qualifying facilities.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and served copies on all parties on the attached service list.

If you have any questions regarding this filing, please contact me at (612) 215- 5367 or [amy.s.fredregill@xcelenergy.com](mailto:amy.s.fredregill@xcelenergy.com).

Sincerely,

/s/

AMY S. FREDREGILL,  
RESOURCE PLANNING AND STRATEGY MANAGER

Enclosures  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

IN THE MATTER OF A COMMISSION  
INQUIRY INTO FEES CHARGED ON  
QUALIFYING FACILITIES

DOCKET NO. E999/CI-15-755

**REPLY COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits this Reply to the May 6, 2016 Comments of the Minnesota Department of Commerce – Division of Energy Resources and other Parties regarding fees charged on qualifying facilities (QF).

We believe the facts demonstrate that:

- Federal and state law including Minn. Stat. 216B.164 allows the Company to establish a monthly metering fee and apply that fee to QF customers who have voluntarily entered into a net metering arrangement;
- The Commission has in several instances and Orders approved the monthly metering fees the Company applies to QF customers;
- The monthly metering fees have been lawfully collected and there is no basis for providing a refund to QF customers for these metering fees; and
- The monthly metering fees we currently apply are reasonable based on the incremental costs associated with the metering equipment, programming and installation of the meters required by QF customers.

This docket was initiated by the Commission to collect information about the fees charged to customers with DG systems that are not charged to all customers. The comments of parties encompass a broad range of issues related to DG customers that are beyond the scope of the initial request. We recognize that significant evolution has occurred in the DG industry demonstrated by the breadth of these comments. We acknowledge that the Commission may want to address the policy question of whether to prospectively collect metering fees solely from QF customers, or to further spread the costs associated with this service among all customers.

We also include the following attachments as part of our Reply Comments:

- Attachment A: Summary of QF Metering Requirements and Fees
- Attachment B: Revised MPUC-003 Response
- Attachment C: Review of Commission Orders and Statutes

## **I. Background and Key Issues**

We know customers are interested in having a variety of choices to meet their energy needs and we have therefore developed a portfolio of options to be responsive to those interests. For customers who choose to install a DG system, we offer net metering which provides customers the benefit of connecting to the grid and the opportunity to receive payment from the utility for excess production. The Company's tariff provisions pertaining to small QFs, including metering fees, are contained in Section 9 (Cogeneration and Small Power Production) of the Company's Minnesota Electric Rate Book No. 2. Attachment A to this Reply provides a summary of the Company's QF metering requirements and fees.

### **A. Metering fees are permissible under federal and state law**

Under the Public Utility Regulatory Policies Act of 1978 (PURPA), QF customers<sup>1</sup> may elect to install a DG system in order to serve all or part of their electrical energy needs. With this voluntary election, there are associated costs. Public utilities, through PURPA rules, are required to sell energy, purchase excess energy, and provide net energy billing services to those systems or customers that comply with the utility's interconnection requirements.

The 2014 PURPA Title II Compliance Manual affirms the utility's allowance to collect fees to cover these costs with the following statement:

*"the QF pays the utility an interconnection fee which is assessed on a non-discriminatory basis with respect to other customers with similar load characteristics... Interconnection costs mean the reasonable cost of connecting, switching, metering, upgrades to transmission, upgrades to distribution, safety provision, and administrative costs incurred by the utility directly related to the interconnecting to the QF."*<sup>2</sup>

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<sup>1</sup> QF customers who have installed a DG system under Section 9 of our Minnesota Electric Rate book are subject to certain DG system size limits (generally less than 1 MW and for some options even less). Customers who install larger DG systems that do not qualify under Section 9 are covered under Section 10 of our Electric Rate Book. In these reply comments, references to QF customers and DG systems are those which meet the eligibility requirements of our Section 9 tariff.

<sup>2</sup> PURPA Title II Compliance Manual at pg. 11, available at this link:  
[http://www.eei.org/issuesandpolicy/stateregulation/Documents/PURPA\\_Title\\_II\\_Manual.pdf](http://www.eei.org/issuesandpolicy/stateregulation/Documents/PURPA_Title_II_Manual.pdf)

In addition to the federal PURPA allowances, these fees are also permissible based on Minn. Stat. § 216B.164, Subd. 8. The statute, in conjunction with the Commission's 1983 Order,<sup>3</sup> requires that the QF bear all interconnection costs, including the additional metering costs that arise as a result of the interconnected activity.

There is an incremental cost associated with QF customers as the Company provides and installs the necessary bi-directional metering equipment to recognize the energy exported from the QF's system onto the Company's distribution system and to provide net energy billing service to compensate the QF customer for production in excess of their usage. Based on the long-standing principle of cost causation<sup>4</sup>, the Company's metering fees applied to QF customers are designed to recover the incremental costs of the services provided to those customers. There are two methods for the recovery of those incremental costs: an up-front charge or a monthly metering fee. At the time QF metering fees were first established, there was a preference for recovering these costs from DG customers on a monthly basis. This was done in response to the interests of stakeholders in reducing up-front costs, and the view that monthly metering charges were a reasonable way to recover such costs. In addition, the fee is based on a meter life of 15 years and recognizes periodic replacements. Given this cycle, the monthly fee is appropriate regardless of how long the DG system is in place.

The metering fees in the Company's Section 9 tariff were first authorized on an interim basis by the Commission in its August 11, 1981 Order in Docket No. E002/M-81-341 (*In the Matter of a Change in the Rate Schedule for the Purchase of Power from a Qualifying Cogeneration Facility*). In this Order, the Commission authorized the filing of the Company's revisions to the Section 9 tariff to implement the Commission's then-pending proposed rules concerning Cogeneration and Small Power Production. The 1984 Order approved the process still in place today whereby the Company's annual tariff is in effect upon filing unless the Commission takes subsequent action.<sup>5</sup>

Legislation passed in 2015 amended some provisions of Minn. Stat. § 216B.164, but those changes were specific to Subd. 3 (a), which applies only to rural electric cooperatives and municipal utilities. We understand the intent of the 2015 legislation was to provide the option to cooperatives and municipal utilities to charge a rate that compensates them for distribution costs that QFs avoid by electing the net metering

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<sup>3</sup> March 7, 1983 Order in Docket No. E999/R-80-560 (*In the Matter of the Proposed Adoption of Rules of the Minnesota Public Utilities Commission Governing Cogeneration and Small Power Production*), at pages 46-48, discussed in more detail in Attachment C.

<sup>4</sup> Minn. Stat. 216B.03 specifies that rates "shall not be unreasonably preferential, unreasonably prejudicial, or discriminatory, but shall be sufficient, and consistent in application to a class of consumers".

<sup>5</sup> October 16, 1984 Order in Docket No. E999/R-84-105 (*In the Matter of the Proposed Adoption of Amendments to the Rules of the Minnesota Public Utilities Commission Governing Cogeneration and Small Power Production*), at pages 31-32, discussed in more detail in Attachment C.

service option. Nothing in the 2015 legislation modified or revised Minn. Stat. § 216B.164, Subd. 8, or the 1983 Order discussed above, which allow utilities to establish a fee to recover incremental interconnection costs.

Additional detail on the relevant Commission Orders as well as state and federal laws is provided as Attachment C to this Reply.

## **B. The Company's current metering fees have been approved by Commission**

The Company has obtained approval from the Commission for the various options we offer QF customers, such as the Solar\*Rewards program. In addition, the metering fees for these programs are filed with the Commission in our annual Small Power Production and Cogeneration Report.

There are also several key Commission Orders that authorize the Company's current metering charges:

- 1981 – A separate metering charge in the Company's Section 9 DG tariff was authorized by the Commission's August 11, 1981 Order in Docket No. E002/M-81-341 (*In the Matter of a Change in the Rate Schedule for the Purchase of Power from a Qualifying Cogeneration Facility*).
- 1983 – In its March 7, 1983 Order in Docket No. E999/R-80-560 (*In the Matter of the Proposed Adoption of Rules of the Minnesota Public Utilities Commission Governing Cogeneration and Small Power Production*), made it clear that metering costs are a legitimate interconnection cost born by the QF and arise solely from the interconnection activity unique to the QF. The Order included a hypothetical bill that assumed a monthly metering charge was reasonable.
- 1984 – In its October 16, 1984 Order in Docket No. E999/R-84-105 (*In the Matter of the Proposed Adoption of Amendments to the Rules of the Minnesota Public Utilities Commission Governing Cogeneration and Small Power Production*), the Commission approved the process, whereby the Company files changes to our Section 9 small QF tariff rates, and those charges go into effect 60 days after the filing unless the Commission takes other action. In fact, the Commission rejected the Company's proposal that changes to the Section 9 tariff should first be approved by the Commission, as explained more fully in Attachment C.
- 2006 – The Section 9 tariff was part of the Company's 2006 electric rate case test year in Docket No. E002/GR-05-1428 (*In the Matter of the Application of Northern States Power Company d/b/a for Authority to Increase Rates for Electric Service in Minnesota*). As part of its filing in that case, the Company proposed tariff

sheets which included the entirety of the Section 9 DG tariff, including the metering rates in that tariff. Following the Commission's Order in that case, the Company submitted a compliance filing that included the entirety of the Section 9 DG tariff as it had originally been proposed.

- Other Orders – The Commission has affirmatively approved tariff filings supporting the DG metering charges in several other dockets including:
  - Its February 16, 2010 Order in Docket No. 09-1167 (*In the Matter of the Petition of Northern States Power Company, a Minnesota Corporation, for Approval of a Solar\*Rewards Contract Tariff*).
  - Its July 23, 2014 Order approving the second generation of the Solar\*Rewards small DG incentive program in Docket No. E002/M-13-1015 (*In the Matter of Xcel Energy's Application for Approval of Solar\*Rewards Tariffs*).
  - Its September 17, 2014 Order in Docket No. E002/M-13-867 (*In the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of Its Proposed Community Solar Garden Program*).

A more detailed discussion of the Commission's approval of these Orders, and other precedents that support the legality of a monthly metering fee, is provided in Attachment C to this Reply.

### **C. Metering fee refund is not appropriate**

Minn. Stat. § 216B.23 provides for refunds only when all of the following have been met:

1. A public utility has charged a rate in violation of this chapter, a commission rule, or a commission order;
2. Revenues were collected as a result of unlawful conduct; *and*
3. The Commission issues a notice for a proceeding to address the refund issue, and makes a determination in that proceeding showing a refund is appropriate up to six years.

(Emphasis added.)

Given that the Company's Section 9 tariff metering fees have been properly established in a filed tariff and lawfully collected, there is no basis for the Commission to order a refund or issue a notice for a proceeding to address a refund. In fact, it would have been unlawful for the Company not to have charged the tariffed rate. The Commission may determine for policy reasons to adjust metering fees on a prospective basis, but a retroactive change is not appropriate in this case.

## **D. Current metering fees are reasonable**

The monthly metering fees the Company collects from QF customers are based on the incremental costs of serving the metering, labor, and the billing requirements of net energy billed customers in excess of those normally incurred by the utility for non-QF customers. In our response to information request MPUC-003, we provided support to demonstrate that these charges are a reflection of the incremental costs associated with installation, equipment, customer accounting, programming, and other incremental costs of the meters required to provide net energy billing service to QF customers, which vary based on the DG facility. The information presented in our response to MPUC-003 is based on the same methodology that was used to approve the metering charges that have been in place since 2007.<sup>6</sup> In fact, MPUC-003 shows our existing metering fees are supported by our current incremental costs, and they would need to be increased to fully recover the incremental costs of providing the voluntary net metering service chosen by many QF customers.

## **II. Policy Issues for the Commission to Consider**

The Company believes that our Commission-approved metering fees are permissible and reasonable and therefore should not be adjusted on a retroactive basis. That said, we acknowledge that there are broader policy issues at play. Thirty years have transpired since the Commission stated its preference for monthly metering fees and, since that time, the landscape around DG has evolved significantly. The number of QF customers on our system has grown with increasing customer interest in renewable energy and the incentives made available to support DG system installation. As a result, it may be appropriate to consider how to handle metering fees in the future including whether we should charge an up-front fee rather than a monthly fee, or prospectively such costs should be spread among all utility customers.

These issues are complex. A number of parties referenced the potential benefits to all ratepayers that may result from the attributes of DG systems. It is also important to recognize the fixed costs associated with providing service that QF customers avoid paying because they are charged on a volumetric rate (kWh usage). The revenue required to cover fixed customer costs, in addition to fixed production, transmission, and distribution costs, is collected through the Company's base rate energy charge. Non-QF customers pay for these costs volumetrically through their kWh consumption charges. Net metered customers avoid paying those fixed costs through the reduced kWh charge on their bill, and in some cases are compensated by non-QF customers for any production in excess of their load.

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<sup>6</sup> We acknowledge one minor error in MPUC-003 Attachment A. We do not apply a carrying charge to bi-directional meter installation costs. A corrected version of Attachment A with an updated calculation is provided as Attachment B to these Reply Comments.

The Company is open to engaging in a policy discussion with the Commission and stakeholders about the allocation of DG system costs and benefits. If the Commission so chooses, we will provide additional information to facilitate that discussion.

### **CONCLUSION**

We appreciate the opportunity to provide this Reply. We believe the facts demonstrate that monthly metering fees are permissible under federal and state law, including Minn. Stat. 216B.164. Furthermore, the fees have been approved by several long-standing Commission Orders. As a result, there is no basis for the Commission to order a refund to customers for these fees. In addition, we believe the facts demonstrate that the current metering fees are reasonable based on the incremental costs of providing this service to customers who voluntarily enter into a net metering arrangement with the Company.

The Company appreciates this opportunity to provide comments and we look forward to further discussion about the future of QF metering fees.

Dated: June 6, 2016

Northern States Power Company



### Summary of QF Metering Requirements and Fees

Current metering charges in Section 9 of the Company's electric rate book are as follows:

Customer Type	Meter Type	Number of Customers	Who Pays	Customer Rate	Monthly Cost for net energy billing services	Additional Tariff References
Qualified Facility (QF)	Bi-Directional Meter*	314	Customer	A50 A51 A52	\$3.15 or \$8.00 depending upon service type * General service charge also applies	Section 9 Section 10
Made in Minnesota QF	Bi-Directional Meter*	442	Customer	A50 A51 A52	\$3.15 or \$8.00 depending upon service type * General service charge also applies	Section 9 Section 10
	Production Meter		Xcel Energy			
Solar Rewards QF	Bi-Directional Meter*	1,070	Customer	A50 A51 A52	\$3.15 or \$8.00 depending upon service type * General service charge also applies	Section 9 Section 10
	Production Meter		Xcel Energy			
Solar Rewards Community (Non-QF)	Bi-Directional Production Meter	3	Developer	A51 <i>(for unsubscribed energy)</i>	\$5.50 or \$8.00 depending upon service type Also requires house power – this is placed on a A10 service rate and has its own monthly service charge	Section 9 Section 10
	General Service Meter		Developer			

*(\*)Optional meter - The monthly cost associated with net energy billing services is a customer choice option based on the generation output of the customer QF in relation to their energy use. Based on this ratio, some customers do not require/request net energy billing services and are therefore not charged the monthly fee.*

**Typical Service and Distributed Generation Metering and Customer Accounting & Assistance Costs***Prepared as support for MPUC IR-003 - E999 CI-15-755 (Annual Costs per customer unless otherwise noted)*

Line	Description	Net Energy Billing Service		Purchase & Sales Billing Service		Time of Day Purchase Service	
		Single Phase	Three Phase	Single Phase	Three Phase	Single Phase	Three Phase
1	<b>Typical Metering Cost (Initial Upfront Costs)</b>						
2	Production Meter	93.16	354.24	354.24	556.96	354.24	556.96
3	Service Meter Bi-directional Programming	22.34	22.34	22.34	22.34	22.34	22.34
4	Installation of Bi-directional Service Meter (if separately billed for initial and replacements)	0.00	0.00	0.00	0.00	0.00	0.00
5	Incremental Meter Costs (2+3+4)	\$115.50	\$376.58	\$376.58	\$579.30	\$376.58	\$579.30
6	Carrying Charge	13.88%	13.88%	13.88%	13.88%	13.88%	13.88%
7	Annualized Incremental Metering Cost (5) x (6)	\$16.03	\$52.28	\$52.28	\$80.42	\$52.28	\$80.42
8	Typical Annualized Service Meter Cost	\$12.93	\$49.18	\$49.18	\$77.32	\$49.18	\$77.32
9	Typical Metering Cost for a Customer with DG (7)+(8)	\$28.97	\$101.46	\$101.46	\$157.74	\$101.46	\$157.74
10	<b>Customer Accounting and Assistance <sup>1</sup></b>						
11	Supervision - FERC 901	\$0.09	\$0.09	\$0.14	\$0.14	\$0.41	\$0.41
12	Meter Reading - FERC 902	\$11.25	\$11.25	\$18.78	\$18.78	\$53.48	\$53.48
13	Customer Records - FERC 903	\$16.14	\$16.14	\$26.96	\$26.96	\$76.77	\$76.77
14	Customer Assistance (Cust. Related) - FERC 908	\$0.79	\$0.79	\$0.79	\$0.79	\$0.79	\$0.79
15	Customer Accounting & Assistance (Prod. Meter) (11+12+13+14)	\$28.27	\$28.27	\$46.68	\$46.68	\$131.46	\$131.46
16	Customer Accounting & Assistance (From Service Metering Analysis)	\$36.38	\$36.38	\$60.21	\$60.21	\$170.01	\$170.01
17	Total Customer Accounting & Assistance (15)+(16)	\$64.65	\$64.65	\$106.89	\$106.89	\$301.47	\$301.47
18	Total Cost for Customers with DG (9)+(17)	\$93.61	\$166.10	\$208.35	\$264.64	\$402.93	\$459.22
19	<b>Incremental Cost</b>						
20	Total Cost for Customers with DG (18)	\$93.61	\$166.10	\$208.35	\$264.64	\$402.93	\$459.22
21	Total Cost for Typical Service Customer (From Service Metering Analysis)	\$49.31	\$85.55	\$109.39	\$137.54	\$219.19	\$247.33
22	Incremental DG Customer Cost (20)-(21)	\$44.30	\$80.55	\$98.96	\$127.10	\$183.74	\$211.88
23	<b>Monthly Cost (22)/12</b>	<b>\$3.69</b>	<b>\$6.71</b>	<b>\$8.25</b>	<b>\$10.59</b>	<b>\$15.31</b>	<b>\$17.66</b>
24	Current Monthly Cogeneration Meter Charge	\$3.15	\$6.40	\$5.50	\$8.00	\$5.50	\$8.00

<sup>1</sup> Based on 2015TY costs and customer counts approved in 13-686

## Typical Service Metering and Customer Accounting & Assistance Costs

Prepared as support for MPUC IR-003 - E999 CI-15-755 (Annual Costs per customer unless otherwise noted)

Line	Description	Residential		Small C&I		Large C&I	
		Single Phase	Three Phase	Single Phase	Three Phase	Single Phase	Three Phase
1	<b>Typical Metering Cost (Initial Upfront Costs)</b>						
2	Installed Cost of Service Billing Meter	93.16	354.24	354.24	556.96	354.24	556.96
3	Carrying Charge	13.88%	13.88%	13.88%	13.88%	13.88%	13.88%
4	Annualized Service Billing Meter Cost (4) x (5)	\$12.93	\$49.18	\$49.18	\$77.32	\$49.18	\$77.32
5	<b>Customer Accounting and Assistance <sup>1</sup></b>						
6	Supervision -FERC 901	\$0.09	\$0.09	\$0.14	\$0.14	\$0.41	\$0.41
7	Meter Reading - FERC 902	\$11.25	\$11.25	\$18.78	\$18.78	\$53.48	\$53.48
8	Customer Records - FERC 903	\$16.14	\$16.14	\$26.96	\$26.96	\$76.77	\$76.77
9	Collection Expense - FERC 904	\$8.11	\$8.11	\$13.54	\$13.54	\$38.56	\$38.56
10	Customer Assistance (Cust. Related) - FERC 908	\$0.79	\$0.79	\$0.79	\$0.79	\$0.79	\$0.79
11	Total Customer Accounting & Assistance Cost (6+7+8+9+10)	\$36.38	\$36.38	\$60.21	\$60.21	\$170.01	\$170.01
12	Total Cost (4)+(11)	\$49.31	\$85.55	\$109.39	\$137.54	\$219.19	\$247.33

<sup>1</sup> Based on 2015TY costs and customer counts approved in 13-686

## Relevant Commission Orders & Statutes

The tariff provisions pertaining to a small Qualifying Facility (QF) including metering charges are contained in Section 9 (Cogeneration and Small Power Production) of the Company's Minnesota Electric Rate Book No. 2. These tariff provisions include payment rates for excess production sold to the Company by the QF customer, and the metering charges that apply to the QF customer. Section 9 also includes metering charges for customers that subscribe to the Company's Solar\*Rewards program and the Solar\*Rewards Community program.

The Section 9 tariff provisions that apply to net metered customers have been authorized by the Minnesota Public Utilities Commission through various Commission Orders and tariff filings since 1981.<sup>1</sup> In addition, the metering charges included in the Company's Solar\*Rewards program and the Solar\*Rewards Community program have been approved by the Commission in conjunction with the filed petitions requesting approval of these relatively new customer tarified offerings.

The following provisions in the Code of Federal Regulations (18 CFR § 292.306) also address the issue of interconnection costs:

*(a) Obligation to pay: Each qualifying facility shall be obligated to pay any interconnection costs which the State regulatory authority (with respect to any electric utility over which it has ratemaking authority) or nonregulated electric utility may assess against the qualifying facility on a nondiscriminatory basis with respect to other customers with similar load characteristics.*

The manner in which a utility should collect those charges is also outlined in this same CFR section, which states:

*(b) Reimbursement of interconnection costs. Each state regulatory authority (with respect to any electric utility over which it has ratemaking authority) and nonregulated utility shall determine the manner for payments of interconnection costs, which may include reimbursement over a reasonable period of time.*

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<sup>1</sup> In submitted Comments, some Parties have referred to the monthly metering fee as a "facilities charge" or an "administrative fee". However, a facilities charge designed to recover the fixed costs incurred by a public utility of providing retail service not recovered through the retail basic monthly charge is not allowed under Minnesota Statutes, unless it is applied by a cooperative or municipal utility as authorized by the Commission under Minn. Stat. 216B.164, subd. 3(a). Such charges are not related to the monthly metering charge, which is allowable and designed to recover the interconnection costs relating to DG metering.

A brief review of these Orders and relevant statutes as well as administrative rules follows:

## **I. Key Commission Orders**

### **A. The Commission's August 1981 Order authorized Xcel Energy's Section 9 tariff including a monthly metering charge**

The metering charges in the Company's Section 9 tariff were first authorized on an interim basis by the Commission in its August 11, 1981 Order in Docket No. E002/M-81-341 (*In the Matter of a Change in the Rate Schedule for the Purchase of Power from a Qualifying Cogeneration Facility*). In this Order, the Commission authorized the filing of the Company's revisions to the Section 9 tariff to implement the Commission's then-pending proposed rules concerning Cogeneration and Small Power Production.

### **B. The Commission's March 1983 Order sets forth a hypothetical monthly bill that includes a metering charge**

The Commission's March 7, 1983 Order in Docket No. E999/R-80-560 (*In the Matter of the Proposed Adoption of Rules of the Minnesota Public Utilities Commission Governing Cogeneration and Small Power Production*), includes a section which addresses metering charges (at pages 46-48) and also sets forth a hypothetical monthly bill (at pages 62 – 63) which includes a monthly metering charge.

The section of this Order pertaining to metering charges makes it clear “*that, ordinarily, metering is a legitimate interconnection cost born by the QF. ... Such costs are additional costs arising solely from the fact of interconnected activity, and are peculiar to the QF.*” Citing Minn. Stat. 216B.164, subd. 8, the Order also noted that “*nothing contained in this section shall be construed to excuse the qualifying facility from any obligation for costs of interconnection...*” and that under this subd. 8, “*a QF must bear all interconnection costs*” including the costs of the second meter.

In the hypothetical bill discussed in this Order, the Commission assumed a monthly metering charge of \$4.60/ month as “*... a reasonable estimate of the monthly carrying cost of one time-of-day meter (this is the fixed monthly charge which Northern States Power Company bills its General Service Time-of-Day customers).*” It used this hypothetical bill to show that the methodology for computing the DG time of day purchase rates was reasonable.

By outlining in this March 1983 Order, in some detail, that metering costs are an interconnection cost which the QF must pay, and by providing a hypothetical bill which included a monthly metering charge, the Commission was clearly authorizing

the additional metering charges based on a monthly charge that is driven by the customer's installation of a DG system.

In their comments, Parties referenced this same March 1983 Order to come to a different conclusion, citing page 54 of the Order. In context, that portion of the Commission Order was discussing the need to address the requirement under Minn. Stat. 216B.164, Subd. 3,<sup>2</sup> that the Commission consider whether there are fixed distribution costs which are not otherwise recovered in the retail monthly customer charge and whether the Commission would allow such costs to be recovered from the DG customer. The Commission was addressing the point that a *retail* customer's energy rate could be raised to cover any under-recovery of fixed costs through the retail monthly customer charge, but in the case of the DG customer (who has reduced energy sales from the utility because it at least in part self-generates) it would be discriminatory to assess that DG customer a fixed monthly charge to recover the fixed costs which are not recovered through the retail monthly customer charge. This discussion is unrelated to the DG metering charge; the DG metering charge is not for the recovery of a fixed distribution cost. Instead, as noted above, the Commission in this same Order noted that the metering cost is an interconnection cost which must be paid for by the DG customer and that it may be recovered through a fixed monthly metering charge.

**C. The Commission's October 1984 Order established an annual process of Section 9 tariff revisions going into effect without need for Commission Order**

In its October 16, 1984 Order in Docket No. E999/R-84-105 (*In the Matter of the Proposed Adoption of Amendments to the Rules of the Minnesota Public Utilities Commission*)

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<sup>2</sup> At the time of this March 1983 Order, Minn. Stat. 216B.164, Sub. 3 was different from the current version of that statute referenced at a later page below. The March 1983 version of this statute provided in pertinent part as follows:

Subd. 3. PURCHASES; SMALL FACILITIES. For qualifying facilities having less than 40 kilowatt capacity, the customer shall be billed for the net energy supplied by the utility according to the applicable rate schedule for sales to that class of customer. In the case of net input into the utility system by the qualifying facility, compensation to the customer shall be at a per kilowatt hour rate set by the commission. In setting these rates, the commission shall consider the fixed distribution costs to the utility not otherwise accounted for in the basic monthly charge and shall ensure that the costs charged to the qualifying facility are not discriminatory in relation to the costs charged to other customers of the utility.

Notwithstanding any other language to the contrary in this section, the commission shall set the rates for net input into the utility system based on avoided costs as defined in 18 C.F.R. Section 292.101(b)(6), the factors listed in 18 C.F.R. Section 292.304, and all other relevant factors. ...

*Governing Cogeneration and Small Power Production*), the Commission approved the process still in place today whereby the Company's annual tariff is in effect unless the Commission takes subsequent action. The Commission rejected the Company's initial proposal that changes to the Section 9 tariff must first be approved by the Commission before they go into effect and are included in the Company's tariff book.

In its Comments, the Commission addressed a proposal by Northern States Power Company (NSP) in Comments which it filed August 2, 1984. NSP proposed that the words "approved by" be substituted for the words "filed with".

The Commission stated:

The Commission disagrees. The purpose of the state-wide contract is to encourage cogeneration and small power production. The Commission finds that the delay in requiring prior approval of utility purchase rate schedules followed by Commission scrutiny and approval insures that the rates will be consistent with the rules. ...

The ALJ agreed with the Commission, writing:

Northern States Power Company suggests that the phrase 'approved by' be substituted for the phrase 'filed with' in the second line of this portion of the Agreement section. The result of the amendment would be to require prior approval by the Commission of the utility purchase rate schedule. The Administrative Law Judge rejects the comment of NSP since the purpose of the rules is to encourage cogeneration and small power production. The delay in requiring prior approval of utility purchase rate schedules would discourage cogeneration and small power production by possibly introducing a substantial time delay prior to required purchase. Qualifying facilities should not be required to wait for the Commission to complete its examination of the rate schedule before the utility is required to purchase its output. The filing of the schedules followed by Commission scrutiny and approval ensures that the rates will be consistent with the rules.

The Commission concludes based on its Comments and the ALJ's findings that no further modification need be made to this part of the contract.<sup>3</sup>

As a result, for the last 30 years, the Company has been following the Commission's established process of annually submitting proposed tariff revisions with the Commission, and then filing the revised tariff sheets in its tariff book if no comments are received or Commission action is not taken after a 60 day comment period. This has resulted in the authorized and approved annual changes to the kWh rates in the Section 9 tariff including occasional changes to the monthly metering rates. Given

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<sup>3</sup> October 1984 Order, at 31-32 (emphasis in original).

the above, we note the contemporaneous construction of a statute by an administrative agency should not be lightly overturned or disregarded where the construction has been acted upon for many years. *U.S. v. State of Minnesota*, 113 F.2d 770, 774 (8<sup>th</sup> Cir. 1940). Also, long-term acquiescence in the practical construction placed upon a statute by an administrative official is entitled to great weight in the construction thereof. *City of St. Paul v. Hall*, 239 Minn. 378, 381-382, 58 N.W.2d 761, 763 (Minn. 1953).

#### **D. Other Commission Orders**

As previously noted, the Section 9 tariff has been revised and updated several times over the past years. These updates included general revisions in a 2005 electric rate case, and the addition of new customer offerings such as the Company's Solar\*Rewards and Solar\*Rewards Community programs.

In our 2006-test year rate case Docket No. E002/GR-05-1428 (*In the Matter of the Application of Northern States Power Company d/b/a for Authority to Increase Rates for Electric Service in Minnesota*), the Company proposed tariff sheets which included the entirety of the Section 9 tariff, including the metering rates in that tariff. This was part of the process of moving these tariff provisions from Rate Book No. 1 to Rate Book No. 2. Following the Commission's September 1, 2006 Order, the Company submitted on November 20, 2006, a compliance filing that included the entirety of the Section 9 tariff as it was originally proposed. The Department, on December 20, 2006, filed comments on this compliance filing, and other than seven points it raised not pertinent to the current discussion, it approved the the Company's compliance filing.

Since that time, the Commission has affirmatively approved the Section 9 metering charge in conjunction with new customer offerings. The Commission, in its February 16, 2010 Order in Docket No. 09-1167 (*In the Matter of the Petition of Northern States Power Company, a Minnesota Corporation, for Approval of a Solar\*Rewards Contract Tariff*) approved the first generation Solar\*Rewards program, including the tariff provisions in Section 9, Sheet 14, which affirmatively have the customer paying the monthly metering charge as set forth in the Section 9 tariff. The tariff provisions on this sheet note the fluctuating nature of these rates, stating:

*“The rates, terms and conditions for sales and purchases of electricity may be changed over the time this Contract is in force, due to actions of the Company or of the Commission, and Customer and Company agree that sales and purchases will be made under the rates in effect each month during the time this Contract is in force... The metering charge may be changed over the time this Contract is in force, due to actions of the Company or of the Commission,*



*and Customer and Company agree that the metering charge will be under the rates in effect each month during the time this Contract is in force.”*

The current Section 9 tariff monthly metering charges have not changed since the February 18, 2010 Order.

The Company then proposed and the Commission approved, in its July 23, 2014 Order in Docket No. E002/M-13-1015 (*In the Matter of Xcel Energy’s Application for Approval of Solar\*Rewards Tariffs*) the second generation of its Solar\*Rewards incentive program. The approved tariff in that Order includes Section 9, Sheet 34, which also affirmatively has the customer paying the monthly metering charge as set forth in the Section 9 tariff, with similar language as found on Sheet 14 as referenced above.

In its September 17, 2014 Order in Docket No. E002/M-13-867 (*In the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of Its Proposed Community Solar Garden Program*) the Commission approved the Solar\*Rewards Community program, which is part of the Section 9 tariff. The Solar\*Rewards Community program tariff includes metering charges on Sheet 75 which mirror the monthly metering charges on Sheet 4 of the Section 9 tariff.

## II. Minnesota Statutes and Rules

### A. Minn. Stat. 216B.164, Subd. 3 (b) and 2015 legislation amending the statute does not bar a monthly metering charge

The 2015 legislation amending the various provisions of Minn. Stat. 216B.164, subd. 3 does not preclude public utilities from assessing a monthly metering charge. Indeed, the amended statutory revision made in 2015, as shown in underlined formatting in the following partial excerpt, does not apply to investor-owned utilities:

Subd. 3. Purchases; small facilities. (a) This paragraph applies to cooperative electric associations and municipal utilities. For a qualifying facility having less than 40-kilowatt capacity, the customer shall be billed for the net energy supplied by the utility according to the applicable rate schedule for sales to that class of customer. A cooperative electric association or municipal utility may charge an additional fee to recover the fixed costs not already paid for by the customer through the customer's existing billing arrangement. Any additional charge by the utility must be reasonable and appropriate for that class of customer based on the most recent cost of service study. The cost of service study must be made available for review by a customer of the utility upon request. In the case of net input into the utility system by a qualifying facility having less than 40-kilowatt capacity, compensation to the customer shall be at a per kilowatt-hour rate determined under paragraph (c) ~~or~~, (d), or (f).

(b) This paragraph applies to public utilities. For a qualifying facility having less than 1,000-kilowatt capacity, the customer shall be billed for the net energy supplied by the utility according to the applicable rate schedule for sales to that class of customer. In the case of net input into the utility system by a qualifying facility having: (1) more than 40-kilowatt but less than 1,000-kilowatt capacity, compensation to the customer shall be at a per kilowatt-hour rate determined under paragraph (c); or (2) less than 40-kilowatt capacity, compensation to the customer shall be at a per-kilowatt rate determined under paragraph (c) or (d).

(c) In setting rates, the commission shall consider the fixed distribution costs to the utility not otherwise accounted for in the basic monthly charge and shall ensure that the costs charged to the qualifying facility are not discriminatory in relation to the costs charged to other customers of the utility. The commission shall set the rates for net input into the utility system based on avoided costs as defined in the Code of Federal Regulations, title 18, section 292.101, paragraph (b)(6), the factors listed in Code of Federal Regulations, title 18, section 292.304, and all other relevant factors.

...

The new statutory language is in a section which clearly states this provision only applies to rural electric cooperatives and municipal utilities. Furthermore, the phrase “*fixed distribution costs to the utility not otherwise accounted for in the basic monthly charge*” referenced here applies to the situation where a cooperative or municipal utilities fixed costs are not being covered by their basic monthly charge. In such a situation where these costs are not recovered from a QF, the statute allows the cooperative or municipal utility, upon a sufficient showing, to impose a charge on a QF to recover these fixed costs. This is different from recovery of the incremental metering costs due to interconnecting a DG.

## **B. Minnesota Rules 7835.4013, Subp. 1, does not bar a monthly metering charge**

Comments by some Parties assert that the Commission’s rules only allow the utility to charge QFs the rate in the utility retail tariff and therefore other tariff provisions which have the monthly metering charge are not authorized. However, a full reading of the pertinent rules suggests otherwise.

Method of billing. The utility must bill the qualifying facility for the energy supplied by the utility that exceeds the amount of energy supplied by the qualifying facility during each billing period according to the utility's applicable retail rate schedule.<sup>4</sup>

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<sup>4</sup> Minn. R. 7835.4013, Subp. 1.

The relevant context here is billing for energy *supplied by the utility* needs to be based on the retail tariff. The monthly metering charge for QFs, on the other hand, which is part of the necessary costs for energy *supplied by the QF* are part of the interconnection costs for the QF and are not related to the energy supplied by the utility.

### **C. The Uniform Statewide Contract provides for a monthly metering charge**

Comments by some Parties argue that Section 6 of the Uniform Statewide Contract, approved in the Commission's 1984 Order, does not permit the utilities to impose a charge in addition to the rates contained in the retail tariff. Section 6 of the current version of the Uniform Statewide Contract is the same today as what had been in Section 3 of the original Uniform Statewide Contract. This provision is as follows:

*The rates for sales and purchases of electricity may change over the time this contract is in force, due to actions of the Utility or of the Commission, and the QF and the Utility agree that sales and purchases will be made under the rates in effect each month during the time this contract is in force.*

This provision is referring to “rates” for purchases, meaning the tariffed QF rates, not the retail rates. It is the Section 9 tariff, not the retail tariff, that addresses the sale of energy by the QF or the purchase of energy by the utility.<sup>5</sup>

The October 1984 Order made this clear on page 32 when discussing this section by referring, by way of example, to the “tariffed” “net energy billing rates” and noting that the net energy billing rates will change annually and other rates are likely to change periodically. At that time, as shown above, the Company's Section 9 tariff sheet for “net energy billing rates” included a monthly metering charge. This, in conjunction with the other provisions of the October 1984 Order referenced above, demonstrate that a tariffed DG monthly metering charge is appropriate and is consistent with the Uniform Statewide Contract. By noting that these rates can change due to actions of the utility, it was referencing its prior discussion in the same order that the utility can change the DG tariff rates without first having Commission approval. This process for changing rates annually only applies to the DG tariff.

Comments by Parties also suggest that Section 12 of the Uniform Statewide Contract (which is the same as Section 8 of the original version of the contract) does not allow the imposition of metering charges because they are imposed as part of a monthly tariffed charge instead of as an amount under this section of the Uniform Statewide Contract. This provision states:

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<sup>5</sup> The Commission rules clarify the perspective on “purchases” and “sales”. See, Minn. R. 7835.0100, subps. 18 and 20. A “purchase” is a purchase by the utility from the QF. A “sale” is a sale by the utility to the QF.

*The QF is responsible for the actual, reasonable costs of interconnection which are estimated to be \$\_\_\_\_\_.* *The QF will pay the Utility in this way:*

\_\_\_\_\_.

The October 1984 Order, in commenting on this provision on page 36 noted that *“it is reasonable and necessary to include only an estimate of such costs in the initial contract because the actual cost will not be known until the final interconnection is made. The QF, however, remains responsible for payment of the actual, reasonable cost of interconnection.”*

It is important to note that this provision in Section 12 (former section 8) is not the only part of the Uniform Statewide Contract which details estimated costs. In those portions of the Uniform Statewide Contract where the DG customer selects the purchase and sale rate (Sections 2, 3, 4, and 5 of the current version, and Section 2 of the original version) all have the exact same clause which states: *“A copy of the presently filed rate schedule is attached to the contract.”* The monthly metering charge is in this rate schedule which is attached to the contract; thus, when entering into the contract, the customer is fully informed of the monthly metering rate. The Section 9 tariff rate schedule on file with the Commission at the time of this Order included the monthly metering charge. There is no requirement in the contract that the monthly metering charge be included in Section 12 when it is also provided as part of an attachment to the contract consistent with other provisions of the Uniform Statewide Contract.

#### **D. The public policy need for production meters is shown in the Commission’s 2014 Order**

Comments by some Parties assert that a production meter should not be required. However, the Commission recently reaffirmed the public policy of requiring a production meter in its January 27, 2014 Order in Docket No. E002/M-13-642 (*In the Matter of Northern States Power Company’s Petition for Approval of Tariff Modifications Implementing Net Metered Facility Provisions, Standby Service Exemptions, and Meter Aggregation Pursuant to the 2013 Omnibus Energy Bill*).<sup>6</sup> The Commission stated in part as follows:

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<sup>6</sup> On February 18, 2014, Xcel Energy filed a request for clarification, noting that the requirement for a production meter was embedded within the proposed tariff sheets to implement expanded net metering at issue in that docket, but that those tariff sheets on net metering were not approved. The request stated that if clarification were granted then Xcel Energy would not submit tariff sheets at that time that incorporated the production meter requirement. The Commission issued an order on April 10, 2014, granting Xcel Energy’s request. April 10, 2014 Order Clarifying January 27, 2014, Order Approving Certain Tariff Amendments. Docket No. E002/M-13-642.

The Department initially recommended that the Commission remove the requirement for two meters from Xcel's proposed net-metered facilities contract. In its reply comments, Xcel stated that the production meter would be necessary for Xcel to meet reporting requirements to the regional reliability council. At the time of the Commission meeting, the Department no longer contested the proposed two-meter requirement in the contract. . . .

The Commission will also approve the proposed language for Xcel's net-metered facilities contract that relates to the requirement for production meters, to ensure the utility's compliance with the reporting requirements of its regional reliability council.

We recognize that current Commission rules have removed what had been Minn. R. 7835.2700 and the requirement that the QF pay for metering. In context, the metering referred to in that Rule was information required in the annual QF report filed by a utility. However, this has no relation to the metering required by the Midcontinent Independent System Operation (the regional reliability council referred to above) or other tariff requirements.

Comments by some Parties assert that the Commission's December 2014 Statement of Need for its revised rules note that production meters are currently not required except where the customer is enrolled in a utility incentive program. This may be an interpretation of the Statement of Need rather than a specific citation. Instead, the reference provided for this assertion in the Commission's Statement of Need reads as follows:

Some advisory committee members identified two other issues for further development: whether to require a production meter at every customer site and whether to require that the customer's system be sized based on customer consumption. The proposed rules do not reach these issues, and the statute does not address them.

The Commission's 2004 interconnection standards set forth generation metering, monitoring, and reporting requirements, which vary depending on the method of interconnection and size of the generation system. They do not require a production meter at every site, and revisiting the Commission's interconnection standards would appear to be the most appropriate method for further exploring this issue.<sup>7</sup>

Nothing in this statement addresses whether production meters are needed under the Section 9 tariff and rules.

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<sup>7</sup> Docket No. E999/R-13-729, *In the Matter of Possible Amendments to Rules Governing Cogeneration and Small Power Production, Minnesota Rules Chapter 7835*, Statement of Need and Reasonableness, December 29, 2014, at 19.

### **E. The Section 10 tariff does not limit the monthly metering charge in the Section 9 tariff**

Comments by some Parties assert that the standard Section 10 process must be used to authorize fees and fee structures as set forth in the Section 10 tariff. The original Uniform Statewide Contract in Section 9 also acts as the interconnection agreement for systems sized up to 40 kW. In other words, if a QF customer applied for the A50, A51 or A52 net metering rates in the Section 9 tariff, and it was less than 40 kW, it would not need to also sign the Section 10 interconnection agreement. The Uniform Statewide Contract in Section 9 is the interconnection agreement for systems of this size. This is consistent with Minn. Stat. § 216B.164, Subd. 6(c) which requires the use of the Uniform Statewide Contract for interconnections with a QF having less than 40 kW capacity, and is also consistent with Sheet 136 of the Section 10 tariff which states that parts of the Section 10 tariff do not apply to generation installations of 40 kW or less.

With the statutory revision expanding net metering for QF systems up to 1 MW, the interplay between the Section 9 and Section 10 tariffs has come under review. The Company has set forth its specific recommendations on how the two should work together in Docket No. E002/M-16-222 (*In the Matter of the Petition of Northern States Power Company for Approval of Tariff Modifications Implementing Rules on Cogeneration and Small Power Production*).<sup>8</sup>

### **III. Metering Fees Refund and Retroactive Ratemaking**

Comments submitted by some parties argue that Xcel Energy should be required to refund its monthly metering charges that have been assessed in accordance with approved tariffs in place for the past 30 years on the basis that charges are unlawful.

Black letter law<sup>9</sup> states that “Utilities are required to file schedules with the commission ‘showing all rates, tolls, tariffs and charges which it has established \*\*\*.’ Minn. Stat. § 216B.05, subd. 1.... Filings made with the commission by utilities ‘continue in force until amended by the public utility or until changed

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<sup>8</sup> See, Petition in Docket No. E002/M-16-222, at p. 13.

<sup>9</sup> In common law legal systems, black letter laws are the well-established technical legal rules that are no longer subject to reasonable dispute.

by the commission \*\*\*.’ Minn. Stat. § 216B.09, subd. 3...’ A filed tariff is “an inherent part of the lawful rate changed to consumers.”<sup>10</sup>

The proposals for refunds would amount to retroactive ratemaking. However, “Retroactive ratemaking is expressly forbidden by statute.”<sup>11</sup> Minn. Stat. 216B.23, subd. 1, so provides:

Whenever upon an investigation made under the provisions of Laws 1974, chapter 429, the commission shall find rates, tolls, charges, schedules or joint rates to be unjust, unreasonable, insufficient, or unjustly discriminatory or preferential or otherwise unreasonable or unlawful, the commission shall determine and by order fix reasonable rates, tolls, charges, schedules, or joint rates to be imposed, observed, and followed *in the future* in lieu of those found to be unreasonable or unlawful. (*emphasis added*)

The statute was amended, effective May 20, 2009, to keep the above provision, but also added the following new provision addressing refunds:

Subd. 1a. Authority to issue refund. (a) On determining that a public utility has charged a rate in violation of this chapter, a commission rule, or a commission order, the commission, after conducting a proceeding, may require the public utility to refund to its customers, in a manner approved by the commission, any revenues the commission finds were collected as a result of the unlawful conduct. Any refund authorized by this section is permitted in addition to any remedies authorized by section 216B.16 or any other law governing rates. Exercising authority under this section does not preclude the commission from pursuing penalties under sections 216B.57 to 216B.61 for the same conduct.

(b) This section must not be construed as allowing:

- (1) retroactive ratemaking;
- (2) refunds based on claims that prior or current approved rates have been unjust, unreasonable, unreasonably preferential, discriminatory, insufficient, inequitable, or inconsistent in application to a class of customers; or

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<sup>10</sup> *Northern States Power Company v. City of Oakdale*, 588 N.W.2d 534, 537-538 (Minn. App. 1999), *citing*, *Computer Tool & Eng’g, Inc., v. Northern States Power Co.*, 453 N.W.2d 569, 573 (Minn. App. 1990).

<sup>11</sup> *In re Minnesota Power for Approval*, Minn. Ct. Appeals, Nos. C2-00-456, C4-00-457, December 19, 2000, unpublished, 2000 WL 1847621, at p. 4, also available at: <https://webcache.googleusercontent.com/search?q=cache:h8rMnDYOXRYJ:https://mn.gov/law-library-stat/archive/ctapun/0012/456.htm+&cd=1&hl=en&ct=clnk&gl=us>. See also, *Peoples Natural Gas Co. v. Minnesota Public Utilities Commission*, 369 N.W.2d 530 at 533 (Minn. 1985), “[T]he Public Utility Act expressly prohibits retroactive ratemaking.”

(3) refunds based on claims that approved rates have not encouraged energy conservation or renewable energy use, or have not furthered the goals of section 216B.164, 216B.241, or 216C.05.

(c) A refund under this subdivision does not apply to revenues collected more than six years before the date of the notice of the commission proceeding required under this subdivision.

Accordingly, this statute provides for refunds only in those instances where all of the following have been met:

1. A rate in violation of this chapter, a commission rule, or a commission order;
2. Revenues were collected as a result of unlawful conduct;
3. The Commission issues a notice for a proceeding to address the refund issue, and makes a determination in that proceeding showing a refund is appropriate; and,
4. No refund can be ordered for revenues collected more than six years before the date of the notice of the commission proceeding.

Given that the Company's Section 9 tariff metering charges have been properly established and lawfully collected, there is no basis under this statute for the Commission to issue a notice for a proceeding to address a refund. As shown above, any revenues collected were pursuant to our properly filed tariffs, and a filed tariff is an "inherent part of the lawful rate charged to consumers, from which neither the utility nor the customer may depart."<sup>12</sup> Where we have properly filed a tariff, and charged the tariff rate, there has been no unlawful conduct and no valid reasoning to order a refund. In fact, it would have been unlawful for the Company not to have charged the tariffed rate. If a refund was ordered for the Company's Section 9 metering charges, it would amount to engaging in the prohibited practice of retroactive ratemaking. As noted by the Commission in 2011, its authority is to "prospectively regulate" rates and that it will "adjust rates according to its own investigations and judgment."<sup>13</sup>

Dated: June 6, 2016

Northern States Power Company

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<sup>12</sup> *Computer Tool*, 453 N.W.2d at 573.

<sup>13</sup> *In the Matter of a Petition by Minnesota Power for Approval of a Rider for Facilities Franchise Fee*, Docket No. E015/M-11-806, October 21, 2011, pp. 4-5



## CERTIFICATE OF SERVICE

I, Carl Cronin, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota,

xx electronic filing

**Docket No. E999/CI-15-755**

Dated this 6<sup>th</sup> day of June 2016

/s/

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Carl Cronin

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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