

January 21, 2022

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket Nos. E002/M-21-815 and E002/M-15-1089

Dear Mr. Seuffert:

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

Xcel Energy's Petition for Approval of a Credit Mechanism to Return  
Customers Department of Energy Settlement Payments.

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve the petition**. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Holly Soderbeck  
Financial Analyst

HCS/ar  
Attachment



## Before the Minnesota Public Utilities Commission

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

Docket Nos. E002/M-21-815 and E002/M-15-1089

#### I. BACKGROUND INFORMATION

On November 24, 2021, Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) submitted its compliance filing addressing the twelfth Department of Energy (DOE) payment covering spent fuel storage damages incurred during 2020. The Company received \$16,550,164 on October 26, 2021 of which \$12,118,943 is applicable to Xcel's Minnesota Jurisdiction. The Company proposed to combine the twelfth DOE customer credit with the combined credit to Minnesota electric customers for the 2020 property tax and annual incentive compensation refunds, currently awaiting a Commission decision in Docket No. E002/M-19-688 (the "2020 True-Up docket").

The Department filed Comments on December 23, 2021, requesting the Company discuss the following in Reply Comments:

- Why the refund of this DOE payment would be delayed until the second half of 2022 (credit implementation timing).
- Provide a copy of the Settlement Agreement and the third extension of the Settlement Agreement and explain any changes. If applicable, provide support for why those changes are appropriate.

The Company filed Reply Comments on January 10, 2022. These Response Comments address the Company's Reply Comments.

#### II. DEPARTMENT ANALYSIS

##### A. CREDIT IMPLEMENTATION TIMING

In its petition dated November 24, 2021, the Company proposed to initiate one-time bill credits in the second quarter or early third quarter of 2022. Typically, the Department recommends refunds be credited to ratepayers within 60 days of the Commission Order.

In its Reply Comments, the Company stated, "The DOE credit involves calculating an individual credit amount for every Minnesota customer based on twelve months of usage; the total setup, testing and posting to accounts involves approximately eight weeks. Therefore, we proposed combining the DOE credit with the already scheduled 2020 property tax and annual incentive program (AIP) refund in our August 10, 2021, Reply Comments in Docket No. E002/M-19-688" (pp. 1-2).

The Company's Reply Comments noted that the Company's billing system is capable of processing only one refund at a time. The Reply Comments also provided an explanation of planned credits for South Dakota and refund for Windsorce customers transition to the Renewable\*Connect program.<sup>1</sup>

Based on the information provided in the petition and Reply Comments, the Department finds the Company's request to initiate the one-time bill credits in the second quarter or early third quarter of 2022 reasonable.

**B. DEPARTMENT OF ENERGY SETTLEMENT AGREEMENT AND EXTENSIONS**

The currently reported twelfth payment is the first of three payments included in the third extension of the Settlement Agreement with the DOE. The third extension of the 2011 Settlement Agreement allows for recovery of damages through December 21, 2022 (payments 12, 13, 14)<sup>2</sup>.

The Department requested the Company provide a copy of the Settlement Agreement and the third extension of the Settlement Agreement. The Department also requested the Company explain any changes and provide support for why changes are appropriate, if necessary.

The Company provided the requested documents in its Reply Comments and stated, "The original Settlement Agreement and the extension documents are martially and substantively the same in terms of the process for claims submission and the standard for determining the Company's allowable costs" (p. 2).

The Reply Comments also explain the third extension of the Settlement Agreement makes a technical change to correct a minor error.

Based on a review of the Settlement Agreement and the third extension, the Department has no further requests or comments at this time.

**III. CONCLUSIONS AND RECOMMENDATIONS**

Based on the above discussion, the Department updates its recommendation to the Commission regarding the timing of the refund to customers. In its Comments, the Department recommended that the Commission require Xcel to provide this refund within 90 days of the Commission's Order unless Xcel demonstrated it is not reasonable to do so. As discussed above, the Department now recommends the Commission approve the Company's proposal to provide this refund in combination with the Company's 2020 True-Up Refund no later than the third quarter of 2022.

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<sup>1</sup> Reply Comments dated January 10, 2022, pp. 2-3.

<sup>2</sup> *Id.*, p. 2.

The Department recommends the Commission:

- Approve the one-time bill credit method for refunding \$12,118,943 to the Minnesota Jurisdiction, including all interest accumulated and net of related bank fees, for the twelfth DOE payment;
- Allow the Company to continue using its current financial institution;
- Require Xcel to provide this refund in combination with the Company's 2020 True-Up Refund, if approved by the Commission, no later than the third quarter of 2022;
- Require the Company to provide a compliance filing within 30 days after completing the related bill credits; and
- Require Xcel to continue to file information and documentation consistent with the Commission's December 16, 2011 Order, Point 11, in Docket No. E002/M-11-807 within 30 days of receiving future DOE payments pursuant to the Extended Settlement Agreement.

/ar

## **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  
Response Comments**

**Docket No. E002/M-21-815 and E002/M-15-1089**

**Dated this 21<sup>st</sup> day of January 2022**

**/s/Sharon Ferguson**

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