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March 16, 2022

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

—Via Electronic Filing—

RE: REPLY COMMENTS  
2021 SALES AND RELATED REVENUE CALCULATIONS  
DOCKET NO. E002/M-20-743

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this Reply to the March 1, 2022 Comments of the Department of Commerce, Division of Energy Resources (Department) and Flint Hills Resources Pine Bend, LLC, Marathon Petroleum Corporation, and USG Interiors (collectively, the Xcel Large Industrials or XLI) filed pursuant to the Commission's February 9, 2022 *Notice of Comment Period* in the above-noted docket. We appreciate the Department's thorough review of our Report and recommendation of approval.

As with other recent prior sales true-up filings, we disagree with and respond below to XLI's request that the Commission disallow "implementation of Xcel's 2021 True-Up in its entirety" or, alternatively, cap the surcharge at \$59.4 million. Every argument XLI raises in support of its position has previously been made and rejected by the Commission, both in its April 2, 2021 Order Approving True-Ups with Modifications and Requiring Xcel to Withdraw Its Notice of Change in Rates and Interim Rate Petition, and its June 14, 2021 Order Denying Reconsideration. Having failed to appeal these decisions, XLI effectively waived its rights with respect to its arguments, and therefore its request should be denied.<sup>1</sup>

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<sup>1</sup> See *In re Freeborn Wind Energy LLC's Application for Large Wind Energy Conversion Sys. Site Permit for 84 MW Freeborn Wind Farm in Freeborn Cty.*, No. A19-1195, 2021 WL 1529113, at \*1–2 (Minn. Ct. App. Apr. 19, 2021) ("Pursuant to MAPA, a certiorari appeal must be filed within 30 days after the party receives the final decision and order of the agency. Minn. Stat. § 14.63. . . . [B]ecause relator did not timely file a certiorari appeal from the first order, issues decided in that order fall outside the scope of our review, and we therefore declined to address them.") (citing *In re Minn. Power for Auth. to Increase Rates for Electric Serv. in State*, 929 N.W.2d 1, 8 (Minn. App. 2019)).

First, XLI argues the sales true-up will result in rates that are not “just and reasonable” as required under Minn. Stat. § 216B.03 because it results in a surcharge for Demand Class customers while residential customers receive a refund.<sup>2</sup> This is the same argument XLI made over a year ago and that was rejected by the Commission at that time. As noted by the Commission in its April 2, 2021 Order, “XLI stated that the anticipated sales true-up would result in a surcharge to the Demand class but in a refund to the Residential class, an unreasonably disproportionate result.”<sup>3</sup> In response, the Commission rejected this argument, stating:

*In response to claims that the Demand class would fare better under a rate case proceeding, the Commission cautions that those assertions do not fully account for the fact that the outcome of either an interim rates decision or a final rates decision is speculative. Any potential reduction to either interim or final rates is unknown. And, while the Company’s interim rates proposal could be reduced if the Commission found exigent circumstances, it is unclear to what extent and in what manner interim rates would be reduced in such a scenario.*<sup>4</sup>

Second, XLI argues the sales true-up conflicts with Minn. Stat. § 216C.05, subd. 2(4), claiming the Company’s rates conflict with “Minnesota’s statutory directive” that “retail electricity rates for each customer class be at least five percent below the national average.”<sup>5</sup> This is, again, an argument that XLI made, and the Commission considered, over a year ago.<sup>6</sup> And in both its current and previous comments, XLI misconstrues and ignores critical pieces of the statutes it cites. Section 216C.05 sets forth “energy policy goals” not “directives,” as XLI claims, and the goal XLI exclusively identifies is one of numerous goals set forth in the statute, much less other goals set forth elsewhere in Minnesota law. The Commission appropriately rejected XLI’s arguments in its April 2, 2021 Order, and XLI has presented no reason to reopen and reconsider that decision now.

Third, XLI argues the sales true-up “violates the five-year MYRP limit imposed by Minn. Stat. § 216B.16, subd. 19(a).”<sup>7</sup> This is, once again, an argument the Commission considered and rejected a year ago:

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<sup>2</sup> XLI Comment at 6-7.

<sup>3</sup> Order Approving True-Ups with Modifications and Requiring Xcel to Withdraw Its Notice of Change in Rates and Interim Rate Petition, at 11 (April 2, 2021); *see also* XLI Reply Comment at 2-4 (Nov. 17, 2020).

<sup>4</sup> April 2, 2021 Order at 13.

<sup>5</sup> XLI Comment at 8.

<sup>6</sup> XLI Nov. 17, 2020 Reply Comment at 3 (“In other words, and directly contrary to section 216B.03, rates for the Demand-Billed class have not been set, to the maximum reasonable extent, to meet the goal in section 216C.05 of having rates for each customer class 5% below the national average.”).

<sup>7</sup> XLI Comment at 11-12.

*As a threshold matter, the Commission is not persuaded that approval of the Stay Out Proposal violates the multiyear rate plan statute, as some parties have claimed. In approving Xcel's 2020 true-ups, the Commission explained that while the statute does not specify what happens to a utility's rates after the conclusion of a multiyear rate plan, Xcel's 2015 multiyear rate plan authorizes rates in effect during the final year of the plan to remain in effect, unless the Company files another multiyear rate plan 60 days prior to the conclusion of the term and proposes new interim rates. This result, the Commission found, was consistent with applicable law and Commission orders determining how utilities subject to a multiyear rate plan should proceed at the conclusion of such a plan.*

*In this case, arguments similar to those raised regarding Xcel's 2020 true-ups have arisen which challenge the Commission's authority to approve Xcel's Stay Out Proposal as an alternative to a general rate case. Minn. Stat. § 216B.16 does not, however, require Xcel to proceed with a rate case at the conclusion of its multiyear rate plan, and the Commission therefore declines to deny the Stay Out Proposal on that basis.*

*The Commission's decision approving Xcel's 2020 true-ups authorized the true-ups without extending the Company's multiyear rate plan, which ended in 2019. The base rates currently in place were previously found to be just and reasonable at the conclusion of Xcel's 2015 multiyear rate plan and are consistent with the Commission's authority under the multiyear rate plan statute to "by order, establish terms, conditions, and procedures for a multiyear rate plan necessary to implement this section and ensure that rates remain just and reasonable during the course of the plan, including terms and procedures for rate adjustment."*

*As the Commission explained in its prior order, utilities are required to include a description of their proposal for the rates that would apply after the term of their rate plan ends. Xcel did so in its 2015 multiyear rate plan by proposing to maintain the rates in effect during the plan's final year—a proposal the Commission approved, ensuring that rates remain just and reasonable after the conclusion of the multiyear rate plan. The Stay Out Proposal maintains the Company's approved base rates.<sup>8</sup>*

Having failed to appeal the Commission's Orders, XLI now, after receiving the benefit of avoiding an interim increase in 2021, asks the Commission to undo its Orders altogether or, alternatively, retroactively impose a cap on the sales true-up surcharge. This request, made nearly a full year after the first Order was issued, is (contrary to XLI's assertions) tantamount to retroactive ratemaking and should be denied. In the past year, the Company has taken significant action in reliance on the Orders. Most notably, the

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<sup>8</sup> April 2, 2021 Order at 12 (citations omitted).

Company withdrew its 2021 electric rate case, but we also withdrew our request to defer and recover pandemic-related costs, including bad debt costs, and agreed to pay for \$17.5 million of bill credits proposed in the residential payment plan credit program in Docket No. E002/M-20-760. These actions cannot now be practically or reasonably undone, and reopening and modifying the Commission's Orders pursuant to Minn. Stat. § 216B.25 without also considering the impacts that doing so would have on these related dockets would be arbitrary and capricious.

Moreover, contrary to XLI's contentions, all of the Company's customers—including C&I customers—benefited from the Company's 2021 Stay Out. As noted by XLI in its comments, had the 2021 Stay Out not been approved, implementation of interim rates in 2021 would have resulted in a \$265.7 million rate increase. That did not occur, and customer rates instead remained flat—subject only to the previously-approved 2020 sales true-up—in 2021. And while the benefit of the projected \$171.1 million 2021 sales true-up compared favorably to an interim rate increase in 2021 at the time of the Orders, now that actual results from 2021 are known, the value is even more apparent. The total true-up amount for 2021 is \$59.4 million, or \$111.7 million less than originally forecast, and the Demand Class surcharge is \$118.4 million, or \$53 million less than the originally forecast \$171.4 million surcharge.

As in the past, the benefit of avoiding an interim rate increase for C&I customers can be seen in a pair of tables (Tables 1 and 2 below), which reveal—contrary to XLI's arguments—that since the Company's last rate case, with sales true-ups in place, average C&I bills have been flat overall, and 2021 is no exception.

**Table 1**  
**Large C&I Average Bills**  
**(C&I Customers with demand greater than or equal to 1 MW)**

	<b>Revenue</b>	<b>Sales</b>	<b>Customers</b>	<b>Average Bill</b>
<b>Year</b>	<b>Millions of \$</b>	<b>MWh</b>	<b>Count</b>	<b>(\$/Month)</b>
2016	\$631.9	8,159,584	503	104,665
2017	\$634.2	8,090,294	504	104,826
2018	\$661.4	8,127,676	506	109,037
2019	\$611.5	7,621,916	506	100,796
2020	\$558.6	7,004,313	502	92,731
2021	\$645.9	7,157,573	497	108,302

**Table 2**  
**Small C&I Average Bills**  
**(C&I Customers with demand less than 1 MW, including non-demand customers)**

	Revenue	Sales	Customers	Average Bill
Year	Millions of \$	MWh	Count	(\$/Month)
2016	\$1,338.8	13,491,958	137,797	810
2017	\$1,428.3	13,219,280	138,466	860
2018	\$1,412.6	13,390,274	139,539	844
2019	\$1,348.6	12,967,627	140,750	798
2020	\$1,268.0	12,082,902	141,360	748
2021	\$1,372.5	12,221,784	135,608	843

For all these reasons, the Commission should not take the extraordinary action of reopening its Order, as suggested by XLI.

We have electronically filed this document with the Minnesota Public Utilities Commission, and notice has been served on the parties on the attached service list. Please contact me at (612) 330-7681 or [lisa.r.peterson@xcelenergy.com](mailto:lisa.r.peterson@xcelenergy.com) or Mary Martinka at (612) 330-6737 or [mary.a.martinka@xcelenergy.com](mailto:mary.a.martinka@xcelenergy.com) if you have questions regarding this filing.

Sincerely,

/s/

LISA R. PETERSON  
MANAGER, REGULATORY ANALYSIS

c: Service List

## CERTIFICATE OF SERVICE

I, Crystal Syvertsen, 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

or

xx electronic filing

**Docket No. E002/M-20-743**

Dated this 16th day of March 2022

/s/

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Crystal Syvertsen  
Regulatory Administrator

[illegible]

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