



414 Nicollet Mall
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May 2, 2022

—Via Electronic Filing—

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

RE: REPLY COMMENTS
2021 ANNUAL FUEL FORECAST AND MONTHLY FUEL COST CHARGES DOCKET
No. E002/AA-20-417

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits this Reply to the April 13, 2022 Comments of the Minnesota Department of Commerce, Division of Energy Resources regarding our 2021 Annual Fuel Forecast True-up Report and proposed recovery of under-recovered fuel costs in the above-referenced docket.

We appreciate the Department's thorough review of our 2021 fuel forecast true-up and recommendation that the Commission approve our true-up costs and implementation plan. In this Reply, we provide additional information about wind curtailment as the Department requests.

The wind curtailment discussion in our 2021 fuel forecast true-up stated that we typically delineate curtailment costs by Transmission Curtailment and Dispatchable Intermittent Resources (DIR) Curtailment. We went on to state, "since curtailment is almost entirely related to regional transmission congestion on the MISO system, the Company will no longer provide a breakout for Transmission Curtailment." While we note that Transmission Curtailment has been declining over the past number of years, we acknowledge that this was an overstatement of how we intend to report on curtailment in future reports. We should have more clearly stated that since Transmission Curtailment costs in this reporting period were relatively small compared to DIR Curtailment, we had not provided the breakdown between these categories in the 2021 report. If in a future reporting year there is a higher percentage

of Transmission Curtailment, our intention was, and is, to include a breakdown between the categories. We apologize for the misunderstanding regarding our discussion of the breakdown between curtailment categories. To prevent confusion related to this issue, we will provide a breakdown between the curtailment categories regardless of the relatively small magnitude of the Transmission Curtailment category in future reports.

Table 1 below provides the total 2021 curtailment in MWh for all wind Company-owned and PPA wind projects due to transmission-related congestion in comparison to the amount of curtailment due to DIR-related curtailment.

Table 1: 2021 Wind Curtailment (MWh)

	Transmission	DIR	Total
Company-owned	17,034	589,196	606,230
PPA	16,468	909,545	926,013
Total	33,502	1,498,741	1,532,243

Thank you for the opportunity to clarify our 2021 curtailment report in this Reply. We respectfully request the Commission approve our 2021 Annual True-Up Report, our proposal to recover \$81.8 million in under-recovered fuel costs for the 2021 calendar year, and the Electric AAA reporting requirements as filed on March 1.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

If you have any questions regarding this filing, please contact Rebecca Eilers at (612) 330-5570 or rebecca.d.eilers@xcelenergy.com or me at 612-330-7681 or lisa.r.peterson@xcelenergy.com.

Sincerely,

/s/

LISA R. PETERSON
MANAGER, REGULATORY ANALYSIS

c: Service List

CERTIFICATE OF SERVICE

I, Mustafa Adam, 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. E002/AA-20-417

Dated this 2nd day of May 2022

/s/

Mustafa Adam
Regulatory Administrator

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