MINNESOTA
PUBLIC UTILITIES COMMISSION

Staff Briefing Papers

Meeting Date	June 23, 2022		Agenda Item 3**
Company	Northern States Power Company d/b/a Xcel Energy (Xcel, Company)		
Docket No.	**E-002/M-20-743**		
	In the Matter of the Petition of Northern States Power Company, dba Xcel Energy, for Approval of True-up Mechanisms		
Issue	Should the Commission approve Xcel's 2021 sales true-up filing and allow Xcel to implement its associated recovery factors?		
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✓ **Relevant Documents**	**Date**
PUC – Approving True-Ups with Modifications and Requiring Xcel to Withdraw its Notice of Change in Rates and Interim Rate Petition	April 2, 2021
Xcel Energy – Compliance Filing (Public and Trade Secret)	February 1, 2022
Department of Commerce – Comments (Public and Trade Secret)	March 1, 2022
Xcel Large Industrials – Comments	March 1, 2022
Xcel Energy – Reply Comments	March 16, 2022
Office of the Attorney General – Reply Comments	March 16, 2022

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I. Statement of the Issues

Should the Commission approve Xcel's 2021 sales true-up filing and allow Xcel to implement its associated recovery factors?

II. Background

On November 2, 2020, Xcel filed a multi-year rate plan[1] (MYRP) and, as an alternative to the MYRP, on the same date, the Company made its true-up and stay-out filing in this docket.

On April 2, 2021, the Commission issued its Order Approving True-Ups and Requiring Xcel to Withdraw its Notice of Change in Rates and Interim Rate Petition, in this docket, which included approval of an annual sales true-up.

On February 1, 2022, Xcel filed its 2021 sales true-up petition.

On March 1, 2022, the Department of Commerce, Division of Energy Resources (Department) filed comments recommending that Xcel's true-up filing be approved.

On March 1, 2022, Xcel Large Industrials (XLI)[2] filed comments recommending that Xcel's true-up be rejected and cap 2021 true-up surcharge at $59.4 million.

On March 16, 2022, Xcel and the Office of the Attorney General (OAG) filed reply comments disagreeing with XLI's recommendation.

III. Parties' Comments

A. Xcel Energy – 2021 Sales True-Up Initial Filing

Xcel indicated that, as shown in Table 1, January-December 2021 retail sales were 28,814,203 megawatt hours (MWh), which is 1,464,578 MWh or 4.8% lower than the 2016 test year weather-normalized retail sales.

[1] In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in the State of Minnesota, Docket No. E-002/GR-20-723.

[2] XLI is an ad hoc consortium of large industrial customers of Northern States Power Company d/b/a Xcel Energy ("Xcel") consisting for purposes of this filing of Flint Hills Resources Pine Bend, LLC; Marathon Petroleum Corporation; and USG Interiors, Inc.

Table 1 - 2016 Test Year and 2021 Actual Sales (MWh)[3]

Class	2016 Test Year	2021 Actual	Difference	Difference %
Residential without Space Heat	8,227,581	8,859,535	631,954	7.7%
Residential with Space Heat	395,914	416,625	20,711	5.2%
Small Commercial & Industrial	13,289,254	12,221,784	-1,067,470	-8.0%
Large Commercial & Industrial	8,159,584	7,157,573	-1,002,011	-12.3%
Public Street & Highway Lighting	134,901	88,337	-46,564	-34.5%
Other Sales to Public Authority	64,046	66,989	-2,943	4.6%
Interdepartmental	7,500	3,359	-4,141	-55.2%
Total	30,278,781	28,814,203	-1,464,578	-4.8%

Xcel explained that sales are influenced by growth in its customer base and customer operations, actions customers take that impact their usage, the economy, and weather. The Company discussed how 2021 sales were impacted by these factors

- **Weather** – weather conditions were generally warmer than normal during both the winter season and the summer season. As shown in Table 2, weather impact on weather-sensitive customer classes' sales[4] was a 459,534 MWh or 1.6% increase.

Table 2 - Comparison, 2021 Actual and Weather Normalized Sales (MWh)[5]

Class	2021 Actual	2021 Weather Normalized	Difference	Difference %
Residential without Space Heat	8,859,535	8,572,712	286,823	3.2%
Residential with Space Heat	416,625	423,915	-7,290	-1.7%
Small Commercial & Industrial	12,221,784	12,041,784	180,001	1.5%
Subtotal – Weather Sensitive Classes	21,497,944	21,038,411	459,534	2.1%
Large Commercial & Industrial	7,157,573	7,157,573	0	0.0%
Public Street & Highway Lighting	88,337	88,337	0	0.0%
Other Sales to Public Authority	66,989	66,989	0	0.0%
Interdepartmental	3,359	3,359	0	0.0%
Total	28,814,203	28,354,668	459,534	1.6%

[3] Source: Initial Filing, Attachment A, page 1 of 1.

[4] Weather-sensitive classes are: Residential without Space Heat, Residential with Space Heat and Small Commercial & Industrial.

[5] Source: Initial Filing, Attachment L, page 3 of 3.

- **Other Drivers** – in addition to weather and relative to the 2016 Test Year, residential sales increases can be attributed to a general increase in usage as customers spent more time at home, and in some cases worked from home as a result of the COVID-19 pandemic shutdowns and social distancing protocols. C&I sales were negatively impacted by several factors: Demand Side Management (DSM) program savings achievements, customers adding combined heat and power (CHP) generation, customers either moving out of the service territory or reducing/shutting down operations, distributed solar generation, weakened economic conditions due to the COVID-19 pandemic. Additionally, C&I customers reduced electricity consumption due to the COVID-19 pandemic that weakened local economic conditions through business shutdowns and reduced hours, resulting in lower demand for goods and services.[6]

As shown in Table 3, the total 2021 sales true-up (surcharge) amount is $59.4 million which includes prior year over-collected total true-up of $4.5 million. The 2021 sales true-up will be credited or surcharged to customer classes through rate adjustment factors applied to bills for the 12-month period of April 1, 2022 through March 31, 2023.

Table 3 – 2021 Sales True-Up Summary[7]

Class	Sales Difference, MWH	Sales Difference, Percent	Base Revenue Difference, $1,000s	Base Revenue Difference, Percent	(Credit)/Surcharge Factor, KWH
Residential	653,456	7.58%	$63,696	0.07%	-$0.0074
Commercial	(67,006)	-7.63%	-$4,817	-5.88%	$0.0059
Demand	(2,000,859)	-9.74%	-$118,397	-9.60%	$0.0036
Lighting-Metered	2,943	4.59%	$363	6.46%	-$0.0057
Interdepartmental	(4,141)	-55.21%	-$234	-54.75%	$0.0382
Total	(1,417,198)	-4.70%	-$59,427	-2.69%	

Xcel proposed the following messages for the respective customer classes to be included on bills beginning April 1:

Residential
Your bill includes a credit of $0.00736 per kWh as a result of a rate adjustment for the differences between 2021 forecast and actual sales. The surcharge begins April 1, 2022 and will be effective for 12 months. See the enclosed notice for details.

[6] Tables 1 through 4 (all Trade Secret) in Xcel's initial filing summarize the Other Drivers' sales impacts.

[7] Source: Initial Filing, Table.

Commercial
Your bill includes a surcharge of $0.00586 per kWh as a result of a rate adjustment for the differences between 2021 forecast and actual sales. The surcharge begins April 1, 2022 and will be effective for 12 months. See the enclosed notice for details.

Demand-Metered
Your bill includes a surcharge of $0.00364 per kWh as a result of a rate adjustment for the differences between 2021 forecast and actual sales. The surcharge begins April 1, 2022 and will be effective for 12 months. See the enclosed notice for details.

Other Public Authorities
Your bill includes a credit of $0.00572 per kWh as a result of a rate adjustment for the differences between 2021 forecast and actual sales. The credit begins April 1, 2022 and will be effective for 12 months. See the enclosed notice for details.

Lighting-Metered Energy
Your bill includes a surcharge of $0.00110 per kWh as a result of a rate adjustment for the differences between 2021 forecast and actual sales. The surcharge begins April 1, 2022 and will be effective for 12 months. See the enclosed notice for details.

Interdepartmental Sales
Your bill includes a surcharge of $0.03823 per kWh as a result of a rate adjustment for the differences between 2021 forecast and actual sales. The surcharge begins April 1, 2022 and will be effective for 12 months. See the enclosed notice for details.

Xcel stated that it will work with the Commission's Consumer Affairs Office (CAO) to finalize the bill messages in advance of implementing the sales true-up adjustment factors and its proposed Customer Notice (bill insert) explaining the true-up and the resulting adjustment factors.[8]

Similar to information that was provided under its now expired decoupling pilot, Xcel's filing included its 2021 Conservation Improvement Program (CIP) achievements. Table 4 summarizes first-year energy achievements for the pre-decoupling 2013-2015 period and the post-decoupling of 2016 through 2021, Table 5 shows 2016 through 2021 lifetime energy savings, by class, Table 6 recaps CIP achievements as a percentage of sales for the pre-decoupling 2013-2015 period and the post-decoupling of 2016 through 2021, and Table 7 shows weather-normalized monthly use per customer, by class, for the pre-decoupling 2013-2015 period and the post-decoupling of 2016 through 2021,

[8] Staff confirms that CAO reviewed and approved the customer notice.

Table 4 - CIP First-Year Energy Achievements by Rate Class, Billing MWh

Year	Residential	Commercial	Demand	Lighting
2013	147,174	19,123	293,211	9
2014	122,522	16,436	308,466	0
2015	152,768	17,871	294,093	11
Pre-Decoupling Average	**140,821**	**17,810**	**298,590**	**7**
2016	167,826	20,002	323,577	56
2017	170,973	23,336	417,630	81
2018	177,759	26,189	428,611	51
2019	171,454	22,379	297,284	14
2020	244,776	25,575	329,645	39
2021	272,991	27,851	369,975	17
Post-Decoupling Average	**200,963**	**24,222**	**361,120**	**43**

Table 5 - CIP Lifetime Energy Achievements, MWH

Year	Residential	Commercial	Demand	Lighting
2016	1,828,430	284,674	4,924,728	902
2017	1,192,618	300,416	6,503,907	1,328
2018	1,192,866	350,965	6,788,550	852
2019	1,046,309	281,947	4,745,718	227
2020	3,626,520	425,126	5,443,707	675
2021	4,061,961	495,818	6,150,499	763
Average	2,158,117	356,491	5,759,518	791

Table 6 - CIP Achievements as Percent of Retail Sales, GWH

Year	First-Year Energy Savings	Retail Sales	Energy Savings as Percent of Retail Sales
2013	495	28,987	1.71%
2014	481	28,987	1.66%
2015	497	28,987	1.71%
Pre-Decoupling Average	**491**	**28,987**	**1.69%**
2016	547	28,987	1.89%
2017	658	28,948	2.27%
2018	680	28,948	2.35%
2019	529	28,948	1.83%
2020	647	28,948	2.23%
2021	722	27,846	2.59%
Post-Decoupling Average	**631**	**28,771**	**2.11%**

Table 7 - Weather-Normalized Monthly Use Per Customer (KWH/customer)

Year	Residential	Small Commercial Non-Demand	Demand	Lighting	Interdepartmental
2013	651	894	38,129	1,789	62,222
2014	650	894	37,797	1,681	84,419
2015	641	871	37,220	1,508	64,590
Pre-Decoupling Average	**647**	**887**	**37,715**	**1,659**	**70,411**
2016	635	855	36,426	1,293	49,019
2017	626	845	35,596	1,345	136,907
2018	612	843	35,084	1,101	118,424
2019	613	824	33,493	1,016	94,627
2020	638	769	30,709	988	119,037
2021	632	764	30,948	931	59,982
Post-Decoupling Average	**625**	**827**	**34,262**	**1,000**	**103,603**

B. Department of Commerce – Comments

The Department stated that Xcel's filing complies with the Commission's (April 2, 2021) Order approving the 2021 sales true-up and, as a result, should be accepted. The Department also recommended that Xcel's 2021 Sales True-Up proposal be approved and that the Company be allowed to begin recovery on April 1, 2022.

The Department's analysis indicated that, since the Company's calculations associated with the actual 2021 retail sales are correct and incorporate the impacts of the 2017 Tax Cut and Jobs Act (TCJA), the $59.427 million is also correct. Xcel's calculations were based on normal weather and associated calculations that were used and approved in setting the 2017-2019 test year final present revenues. Thus, base rates for 2021 remained unchanged as described in the Company's October 1, 2020 Stay Out Proposal for 2021.

Over the 2015 MYRP, the Demand class has had the largest MWh decline and, except 2020 and 2021, accounted for over 99 percent of the overall declines in each year. Additionally, Company Witness Jannell E. Marks, in her Direct Testimony in Xcel's 2019 MYRP,[9] stated that sales have been declining since 2009 due in part to "the loss of specific large customer loads from the customers' addition of combined heat and power operations" and "the loss of load for several Large Commercial and Industrial [LCI] customers in 2012-2013 and 2017-2018."

The Department noted that reasons for the differences between the 2016 test year and 2021 all classes' actuals, include, but are not limited to following:

[9] Docket No. E-002/GR-19-564.

- First, there could be customer gains and/or losses in the intervening periods;
- Second, there will be differences in economic and/or weather conditions between the base year and the comparison year(s); and
- Third there are factors such as CHP, and behind-the-meter (BTMG) production that can be accounted for in a customer's historical consumption in addition to all of the incremental conservation that could account for the difference between what is embedded in the base year and the comparison year(s).

Factors impacting the Demand class' sales decline are as follows:

- customer-operated CHP generation;
- behind-the-meter (BTMG) solar generation;
- customers either relocating out of Xcel's Minnesota service territory or reducing/shutting down operations;
- potential customer growth that offsets part of the decline or potential customer decline; and
- differences in economic and/or weather conditions and, a combination of the Company's and/or customers' CIP Portfolio.

Of the factors that have contributed to the Demand Class' sales decline, the installation of additional BTMG solar facilities, could continue in 2022 and beyond, resulting in further sales decline.

C. Xcel Large Industrials – Comments

XLI noted that Xcel's initial filing in this docket projected that, compared to an interim-rate increase of $161.2 million in the 2021 Rate Case,[10] the demand-billed customers would pay $171.4 million under a 2021 Sales True-Up. The Sales True-Up Filing assigns the demand-billed customers a true-up surcharge of $59.4 million while seeking to refund residential customers approximately $63.7 million. While the overall amounts are less than initially projected, demand-billed customers are still allocated a true-up value of approximately $118.4 million while residential customers are allocated a refund of approximately $63.7 million. In other words, the claimed charge to demand-billed customers is roughly double Xcel's alleged true-up need in order to fund a refund to the residential class that is the size of Xcel's claimed revenue deficiency. Based on these figures, demand-billed customers' 2021 Sales True-Up is approximately double Xcel's alleged true-up need in order to fund a refund to the residential class that is the size of Xcel's claimed revenue deficiency.

The Commission may exercise its authority to modify the 2021 stay out by using Minnesota Statutes § 216B.25 states that "[t]he commission may at any time, on its own motion or upon motion of an interested party, and upon notice to the public utility … rescind, alter, or amend any order fixing rates, tolls, charges, or schedules, or any other order made by the

[10] Docket E-002/GR-21-630.

commission." (Emphasis added.) By using the same statue, the Commission could also modify 2021 true-up.

Demand-billed customer rates and bills do not comply with Minnesota Energy Policy and the 2021 true-up expands noncompliance. Minnesota Statutes § 216C.05, subd. 2(4) makes it "the energy policy of the state of Minnesota that: … retail electricity rates for each customer class be at least five percent below the national average." But both rates and bills for large demand-billed customers have increased to unsustainable levels. With respect to rates, the average delivered cost of energy for Xcel's industrial customers was $.0798/kWh in 2020. This rate was roughly 19.6% higher than the 2020 national average for industrial customers, which was $.0667/kWh. Plainly stated: Xcel's 2020 industrial rates did not comply with Minnesota's statutory directive.

XLI proposed rejection of 2021 true-up in favor of pursuing rates that are just and reasonable. In other words, the utility's burden in obtaining rate recovery is a two-step process. First, the utility must establish the amount of a given cost as a judicial fact. Second, the utility must establish that it is just and reasonable for ratepayers (as opposed to the Company's shareholders) to bear those costs. Xcel has not met this heavy, but not insurmountable, burden. Alternatively, XLI suggests that the 2021 True-Up be capped at Xcel's stated revenue deficiency of $59.4 million. Rather than saddle certain ratepayer classes with funding refunds for other customers, XLI suggested capping the 2021 True-Up at Xcel's stated revenue deficiency creates a more equitable result.

Additionally, XLI noted that, on October 25, 2021, Xcel filed a new MYRP, using a forecast 2022 test year, in which it seeks increases of $396 million in 2022, an incremental $150.2 million in 2023, and an incremental $131.2 million in 2024 for a total increase of $677.4 million in three years. Xcel also provided informational forecasts for 2025 and 2026, which are estimated to be an incremental $70 million and $118 million, respectively. As part of the 2022 Rate Case, Xcel sought an interim rate increase of approximately $288 million or 13.52% across all customer classes. The Commission, however, declined to accept Xcel's full interim rates request and, based upon its judicial notice of various factors, found exigent circumstances for the residential customer class. The Commission then ordered a reduction of the interim rate increase for residential customers only, capping Xcel's incremental increase at $79.85 million for that class. As a result, residential customers will pay a 2022 interim rate increase of approximately 8.92%, while Xcel's remaining customers will incur an interim rate increase of 13.52%. Though the Commission's interim rates decision is not immediately appealable, both XLI and Xcel filed letters flagging concerns with the Commission's decision to unilaterally lower interim rates for one class, including the potential for an inequitable distribution of an interim rate refund. Notwithstanding concerns about the interim rates decision, Xcel was permitted to begin collecting the interim rate increase on January 1, 2022.

D. Xcel Energy – Reply Comments

Xcel agreed with the Department's review and approval recommendation.

Xcel disagreed with XLI's recommendation to cap recovery from demand-billed customers at $59.4 million and XLI's recommendation to retroactively cap the sales true-up. Xcel noted that every argument XLI raised 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.

First, XLI argued 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. 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."

Second, XLI argued 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." This is, again, an argument that XLI made, and the Commission considered, over a year ago. 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)." 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.

As in the past, the benefit of avoiding an interim rate increase for C&I customers can be seen in Tables 8 and 9 which, contrary to XLI's arguments, reveal 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 8 - Large C&I Average Bills
(C&I Customers with demand greater than or equal to 1 MW)

Year	Revenue, in Millions	Sales, MWH	Customer Counts	Average Bill, $/Month
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 9 Small C&I Average Bills
(C&I Customers with demand less than 1 MW, including non-demand customers)

Year	Revenue, in Millions	Sales, MWH	Customer Counts	Average Bill, $/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

E. Office of Attorney General- Reply Comments

The Office of Attorney General-Residential Utilities Division (OAG) rejected XLI's arguments for approving Xcel Energy 2021 true-up and added that XLI is using old rejected arguments to influence the Commission to modify or abolish the 2021 true-up. XLI resurrected the same defective argument they used to challenge the Commission's authority to adopt Xcel's 2019 and 2020 Stay Out proposals, as well as the 2020 Sales True-Up. Namely, they argue that the true-up violates the multiyear rate plan statute by exceeding the five-year MYRP rate limit. There is no merit to the argument that the 2021 Sales True-Up results in the Demand class subsidizing the Residential class. The impact of the true-up on each class is directly related to the sales growth or decline of that class. Demand class sales decreased in 2021, while Residential class sales increased; hence, the Demand class surcharge. XLIs' proposed modifications to the 2021 True-Up would constitute retroactive ratemaking and would unjustly and unreasonably strip the Residential class of its 2021 Sales True-Up refund, resulting in increased residential rates. Moreover, the proposed modifications are not in the public interest and seek to relitigate the 2021 Stay Out.

The 2021 Sales True-Up complies with the 2021 Stay Out Order and comparison to Xcel's pending rate case is improper. The impacts of the true-up on the Demand class are lower than originally forecasted by the 2021 Stay Out. Also, XLIs benefit from deliberately constructed rate mitigation measures that were incorporated into the 2021 Stay Out Order to soften the negative impacts of a Demand class sales decrease. Finally, while the 2021 Stay Out Order was based on a full rate case record, the outcome of Xcel's pending rate case remains uncertain.

IV. Staff Comments

Staff verified Xcel's calculations and concurs with the Department that they are correct and consistent with the approved methodology. Staff also notes that the final 2021 sales true-up is consistent with estimates presented in Xcel's 2021 "stay-out" petition[11] that included a request for approval of a 2021 sales-up.

Regarding XLI's request to reduce the Demand Class' true-up amount, Staff agrees with the Department and the OAG that many of XLI's arguments were previously made when they opposed Xcel's initial filing.

Staff notes that Xcel's previous two MYRPs[12] did not conclude until *after* the initial test year had lapsed. In both instances, test year sales for that first year were trued up to actual; therefore, it is not unreasonable to expect a similar outcome had the 2020 rate case (2021 Test Year) proceeded. If that likely outcome were true, then the Demand Class' impact would have seen a similar to the outcome of the requested sales true up in this proceeding and, using XLI's same argument, it could be said that Xcel is not seeking to recover any more than it would have likely received had the rate case proceeded. Additionally, Staff notes that XLI's includes comparisons between 2021 sales true-up outcome to Xcel's requested increase in its 2021 MYRP rate case.[13] By doing this, XLI is conflating two proceedings that apply to different dates. The 2021 sales true-up applies to the 2021 calendar year. The first test year in 2021 MYRP is the 2022 calendar year. Therefore, since the 2021 MYRP is unrelated to this proceeding, XLI's references to the 2021 MYRP are unrelated this proceeding.

With respect to XLI's observation about whether Xcel has met the state energy policy goal that "retail electricity rates for each customer class be at least five percent below the national average" which is in Minn. Stat. 216C.05, subd. 2(4). The Legislature enacted this goal in 2017 in an amendment to the three other energy policy goals in Minn. Stat., Ch. 216C, Staff agrees with Xcel's comments that this argument was already considered and rejected in the Commission's April 2, 2021 Order in this docket.

V. Decision Alternatives

2020 Sales True-Up Report

1. Accept Xcel's 2021 sales true-up report. (Xcel, DOC)
2. Do not accept Xcel's 2021 sales true-up report.

2021 Sales True-Up Amount

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[11] Order Approving True-Ups with Modifications and Requiring Xcel to Withdraw Its Notice of Change in Rates and Interim Rate Petition, In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of 2021 True-Up Mechanisms, Docket No. E-002/M-20-743 (April 2, 2021)

[12] Dockets Nos. Docket E-002/GR-13-868 and Docket E-002/GR-15-826.

[13] Docket E-002/GR-21-630.

3. Approve Xcel's 2021 sales true-up recovery of $119.448 million and allow the Company to implement its recovery factors beginning April 1, 2022. (Xcel, DOC, OAG)

4. Reduce Xcel's 2020 sales true-up recovery to reflect a cap of $59.4 million for the Demand Class. (XLI)