

June 30, 2022

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

RE: Response Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. G002/M-22-160

Dear Mr. Seuffert:

On April 1, 2022, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) submitted to the Minnesota Public Utilities Commission (Commission) *A Petition of Northern States Power Company for Approval of a Natural Gas Conservation Improvement Program (CIP) Adjustment Factor (Petition)*.

On June 8, 2022, the Department filed comments requesting Xcel Energy provide the following in its reply comments:

- An updated 2021 Natural Gas Tracker corrected for the gas/electric Center for Energy and Environment (CEE) One Stop recording error; and
- Updated 2021 Natural Gas Shared Savings Demand Side Management (DSM) calculations, as found in the Company's *Petition* Attachment A, pages 22-23.

The Department stated it would make its final recommendation after reviewing Xcel's reply comments.

On June 16, 2022, the Department discussed the 2021 Natural Gas Tracker balance, Shared Savings DSM financial incentive, and associated CEE One Stop recording error with Xcel Energy. In this meeting, Xcel stated the Company's 2021 accounting books are closed. Xcel articulated its preference for keeping its accounting books in alignment with the 2021 Tracker and Status Reports and recommended making an adjustment to the 2022 Tracker for the CEE One Stop error. The Department agreed the request was reasonable. Xcel agreed to provide a hypothetical 2021 Tracker, without the error, for the Department's review. Xcel further agreed to provide updated calculations for the Shared Savings DSM calculations.

On June 21, 2022, Xcel Energy filed its reply comments along with a hypothetical 2021 Tracker and updated CIP Natural Gas financial incentive calculation. The natural gas financial incentive decreased by \$7,142 due to the CEE One Stop error. This was offset by an increase in the electric filing of the same amount.

Xcel's reply comments requested Commission approval of the following:

- A proposed 2021 Natural Gas Shared Savings Demand Side Management financial incentive of \$5,013,004;
- Its CIP Natural Gas Tracker Account as filed on April 1, 2022; and
- A proposed 2022/2023 Natural Gas CIP Adjustment Factor (CAF) of \$0.031578 per therm, subject to an updated compliance filing including: an increase of \$71,421 in July, an updated 2022 incentive as approved, and to-date spending.

The Department reviewed Xcel's reply comments and attached 2021 Tracker and calculations. The Department concludes Xcel Energy's filing is reasonable.

The Department recommends the Commission take the following action:

1. Approve Xcel Energy's Natural Gas Shared Saving DSM financial incentive of \$5,013,004;
2. Approve Xcel Energy's Natural Gas 2021 Tracker account as filed on April 1, 2022, with an ending balance of (\$347,477); and approve Xcel Energy's request to make an adjustment to the 2022 Tracker account for the CEE One Stop correction;
3. Approve a 2022/2023 Natural Gas CIP Adjustment Factor of \$0.031578/therm beginning October 1, 2022, or the first billing cycle in the month following the Commission's *Order* in this matter, whichever is later, conditional on the Company submitting, within 10 days of the issue date of the *Order* in the present docket, a compliance filing with tariff sheets and necessary calculations complying with the Commission's determinations in this matter; and
4. Approve Xcel's bill message, effective the first month the 2022/2023 Natural Gas CIP Adjustment Factor takes effect, revised as necessary to incorporate the approved CAF and effective date.

The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ANGIE SKAYER
Financial Analyst
AS/DW/ja

/s/ DANIELLE WINNER
Rates Analyst

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. G002/M-22-160

Dated this 30th day of June 2022

/s/Sharon Ferguson

[illegible]

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