

414 Nicollet Mall Minneapolis, MN 55401

November 3, 2023

-Via Electronic Filing-

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

RE: 2022 ANNUAL COMPLIANCE REPORT REGULATORY TREATMENT OF NET OPERATING LOSS DOCKET NOS. E002/GR-10-971 and E002/GR-21-630

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the attached 2022 Annual Compliance Report as required by paragraph 11 of the Commission's May 14, 2012 ORDER in Docket No. E002/GR-10-971.

In this report we provide:

- The 2022 actual Deferred Tax Asset balance as provided in our Jurisdictional Annual Report submitted May 1, 2023 in Docket No. E,G999/PR-23-4;
- A discussion of the 2022 amounts with respect to the 2022 test year from our 2022 MYRP electric rate case (Docket No. E002/GR-21-630); and
- Schedules supporting our calculations and itemizing the different types of accelerated deductions and expenses included in the 2022 Cost of Service Study (COSS) used to support the Company's May 1, 2023 Jurisdictional Annual Report process.

We have electronically filed this document with the Minnesota Public Utilities Commission and copies have been served on the parties on the attached service lists.

Please contact Benjamin Halama at (612) 330-5703 or <u>benjamin.halama@xcelenergy.com</u> or me at (612) 337-2268 or <u>amber.r.hedlund@xcelenergy.com</u> if you have any questions regarding this matter.

Sincerely,

/s/

Amber R. Hedlund Manager, Regulatory Project Management & Rate Cases

Attachments c: Service Lists

STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben Valerie Means Matthew Schuerger Joseph K. Sullivan John A. Tuma

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 Chair Commissioner Commissioner Commissioner

DOCKET NO. E002/GR-10-971 DOCKET NO. E002/GR-21-630

ANNUAL COMPLIANCE REPORT

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission (Commission) this annual compliance report regarding the Company's treatment of the established Deferred Tax Asset (DTA) balances associated with the regulatory treatment of Net Operating Loss (NOL) for 2022 for the Minnesota retail jurisdiction electric utility operations as ordered in Docket No. E002/GR-10-971.

This annual report demonstrates our compliance with the terms of the NOL Agreement, presents a Tracker that documents our DTA, and quantifies the annual revenue requirement impact.

Since the NOL Agreement is only related to Minnesota retail jurisdiction electric utility operations, this report does not address the regulatory treatment of the NOL related to the gas utility.

Under our NOL Agreement, we are required to track and return to customers any excess revenue requirement associated with the DTA compared to the level recovered in base rates. Based on the information contained in the Company's May 1, 2023 Jurisdictional Annual Report, in Attachment A to this Annual Report for the year 2022, the DTA increased, but did not increase as much as forecasted in base rates, so a refund is due to customers.

In this filing we discuss the reasons for the change in DTA balance, and provide the following:

- The 2022 actual DTA balance as provided in our Jurisdictional Annual Report submitted May 1, 2023 in Docket No. E,G999/PR-23-4 (see Attachment A to this filing for page E-14B from the 2022 Jurisdictional Annual Report);
- A discussion of the 2022 amounts with respect to the 2022 test year from our 2022-2024 MYRP electric rate case (Docket No. E002/GR-21-630);
- Schedules supporting our calculations and itemizing the different types of accelerated deductions and expenses included in the 2022 Cost of Service Study (COSS) used to support the Company's May 1, 2023 Jurisdictional Annual Report process.

ANNUAL REPORT

A. Background

The NOL Agreement reflects the agreement between the Company and the Department of Commerce for treatment of the NOL that was reached during the hearing in Docket No. E002/GR-10-971. The NOL Agreement was accepted by the Commission in that same docket and included in the Commission's May 14, 2012 FINDINGS OF FACT, CONCLUSIONS, AND ORDER. The NOL Agreement included projections for both the levels of the DTA and the time for utilization of the DTA. In order to track actual DTA levels (which can vary from projections based on actual results), the NOL Agreement also established an annual compliance filing requirement, along with the DTA Tracker.

To establish a complete DTA balance record, this compliance report starts with our 2010 Jurisdictional Annual Report balances, which was the first year the Company reported a DTA associated with a NOL tax position.

B. NOL Agreement Compliance

In this section, we outline our compliance with the various requirements of our NOL Agreement. Specifically, we state each requirement and outline our response, providing references to supporting attachments as appropriate.

1. Begin reflecting in our 2011 Minnesota jurisdictional annual report (filed on May 1, 2012), a deferred tax asset estimated to be \$197 million at the end of 2011 based on the test year amounts as shown on Mr. Robinson's Schedules 4 and 5, page 2 of 4, lines 29 and 30, which amount shall be trued up for actual results in the May 1 Report for the Minnesota Electric jurisdiction.

We have provided this information on Page E-14B of our 2022 Jurisdictional Annual Report filed May 1, 2023. For convenience, we provide as Attachment A to this Annual Report Page E-14B as filed. In addition, we note that we also provide a historical summary of DTA balances and annual activity previously reported, beginning with the first DTA balance established in 2010, as Attachment B, page 1 of 3, to this Annual Report.

2. Establish a regulatory liability on the Company's books each year, beginning in 2012, for the revenue requirements associated with the consumption of the deferred tax asset that is projected to occur in that year, based on the budget data included in the jurisdictional annual report in order to ensure that these amounts are reflected as being owed to customers as they are consumed.

As discussed in items 4.c. below, the deferred tax asset increased more than forecasted in 2022. Therefore, a refund obligation was created for 2022.

3. Provide that this agreement extends through all future periods until such time as the deferred tax asset is fully consumed and the total aggregate revenue requirements associated with the consumption are returned either as a refund or a reduction to customer rates.

With the first compliance report under the NOL Agreement made on May 31, 2012, the Company provided our Tracker that established the DTA balances related to unused tax credits and depreciation deductions. The revenue requirement associated with the generation of unused deductions and unused production tax credit (PTC) balances is currently an increase to customer rates per Attachment B, page 3 of 3 and is assessed in this compliance filing on an annual basis for any potential refund.

4. File on May 31 of each year, until such time that the deferred tax asset balance is fully reversed, a compliance report of the 1) deferred tax asset associated with the unused tax deductions and production tax credit (PTC) carry forward balances; 2) the deferred tax liability associated with the year-by-year net change in bonus tax depreciation as provided by the December 2010 tax law change; and, 3) the revenue requirement effect of the actual utilization of the balances listed in 1 and 2 above. The projected cumulative revenue requirement established in the 2011 rate case test year is approximately \$60 million through the year 2015.

The compliance report shall be based upon the Company's annual report filed with the Department of Commerce and the Commission each May 1 and shall, if applicable, include a proposed refund plan to return to ratepayers the revenue requirement effect associated with the utilization of these deferred tax benefits. If there is not a refund required for any year, the Company must clearly explain why this occurred, and explain any changes in the amounts estimated in Mr. Robinson's Rebuttal Testimony on page 17, Table 3 which identified the \$58.2 million in total (and as shown on Xcel Energy's Attachment 1 of approximately \$60 million in total) along with estimated annual amounts to be given back to ratepayers over the period 2012 to 2015.

We provide as Attachment B to this Annual Report:

- A summary of our reported NOL-related DTA balance and annual activity included in previous reports for the period 2010 through the end of year 2021 (page 1 of 3);
- The NOL-related DTA balance and annual activity for the Minnesota retail jurisdiction electric utility operations for the period January 1, 2022 through December 31, 2022 (page 2 of 3);
- The NOL-related DTA balance and annual activity for the Minnesota retail jurisdiction electric utility operations 2022 test year (page 3 of 3).

We note that item 4(2) above (*the deferred tax liability associated with the year-by-year net change in bonus tax depreciation as provided by the December 2010 tax law change*), as indicated in the Company's initial annual report on May 31, 2012, continues to be calculated as part of our base data used to perform the Cost of Service Study and to determine the appropriate level of deductions and credits that are required to be carried forward to future periods.

We provide as Attachment C to this Annual Report a comprehensive breakdown of all the components of depreciation and removal used to determine taxable income in the Company's 2022 COSS.

As detailed in Attachment C, plant investment-related depreciation and removal deductions for 2022 exceeded \$1,310 million for the Minnesota retail jurisdiction, of which \$15.7 million was derived from additional qualifying bonus depreciation. Due to the magnitude of tax depreciation deductions, the Company has been prevented from being able to monetize other tax benefits such as tax credits. The Company must prioritize tax depreciation deductions before tax credit utilization, and due to the consistently large tax depreciation deductions, an additional \$180.7 million of federal credits were deferred and carried forward to future periods.

We discuss NOL actual activity to date, the projected balance additions and utilization, and the amounts expected to be returned to customers in more detail below.

a. NOL Activity to Date

As outlined in Attachment B, page 1 of 3 to this Annual Report, our cumulative

NOL activity through December 31, 2021 resulted in no NOL DTA balance and no deduction to be carried forward to 2022. The accumulation of Federal and State tax credits unused to date resulted in a \$492 million DTA at the end of 2021, which rolled forward into the 2022 DTA beginning balance.

The 2021 tax return filed during 2022 included \$44.9 million in deductions not accrued for on December 31, 2021. This amount was adjusted in 2022 when the tax return was filed and increases the DTA balance in 2022 by \$12.5 million. This prior period activity was offset in the current-year deferred taxes.

With respect to 2022 current-year activity:

Information pertaining to the 2022 current-year activity is provided in Column D of Attachment B, page 2 of 3. The Company offset approximately \$44.9 million in prior-year deductions, which caused a decrease to the NOL DTA balance of \$12.5 million. The Company experienced an increase in unmonetized Federal tax credits, which caused an increase to rate base of \$180.7 million. The net result of the tax credit deferrals resulted in an increase to rate base of \$180.7 million.

As a result of the activity during 2022 described above, a net increase of the revenue requirement in the amount of \$7.5 million occurred on an actual basis.

b. Rate Case Results - 2022 Test Year

On October 6, 2023, the Commission ordered final rates in the Company's 2022-2024 MYRP electric rate case in Docket No. E002/GR-21-630. The amounts embedded in customer rates associated with the 2022 test year are based upon the final compliance cost of service and are shown on page 3 of Attachment B of this Annual Report. The final compliance cost of service resulted in unused deductions and federal and state tax credits totaling \$205.9 million.

As a result of the activity in the 2022 test year described above, a net increase of the revenue requirement in the amount of \$9.1 million occurred and is presented in Attachment B, page 3, line 22.

c. Annual Revenue Requirement Impacts

As indicated above, the Company experienced an increase in the DTA balance in 2022 resulting in a revenue requirement increase of \$7.5 million. The table at the bottom of Attachment B, page 2 of 3 provides the annual revenue requirement increase resulting from the DTA balance net generation, computed using our last authorized return on

equity and actual cost of debt and capitalization ratios for the year 2022. With respect to the 2022 test year from the most recent rate case, the 2022 results show a net generation that results in a \$9.1 million revenue requirement increase, shown in Attachment B, page 3 of 3. Because the revenue requirement increase included in base rates in 2022 is greater than the calculated amount in the Company's May 1, 2023 Jurisdictional Annual Reporting process (see reporting in Attachment B), a regulatory liability will be established in the amount of \$1.6 million in order to comply with the NOL agreement. A comparison between the actual revenue requirement increase that occurred and the amount authorized in final rates is presented below:

2022 Net Operating Loss Refund

	Annual NOL		
	Report (1)	Final Rates (2)	Refund (3)
Revenue Requirement Increase	7,489,834	9,116,743	(1,626,909)

Notes:

(1) From Attachment B, Page 2, Line 22

(2) From Attachment B, Page 3, Line 22

(3) Difference between Annual Report and Final Rates

C. Refund Plan

In this section, we summarize our electric utility refund proposal.

1. Overview

We propose approximately \$1.6 million be refunded to electric customers through one-time bill credits. We plan to allocate the refund dollars to class based on 2022 rate base. The NOL refund amount for a typical residential electric customer will be approximately \$0.59, including interest at the cost of short-term debt ordered in the Company's last rate case.¹

As approved by the Commission for prior year electric refunds,² we propose combining the NOL refund to electric customers with a projected property tax and other refunds. We have included a detailed refund plan in our 2022 Property Tax True-Up Report filed concurrently with this report in Docket No. E002/GR-21-630. The plan will include class allocations for each refund element and estimated refund

¹ Docket No. E002/GR-21-630, FINDINGS OF FACT, CONCLUSIONS, AND ORDER at 47 (July 17, 2023).

² Docket Nos. E002/M-20-743, E002/GR-92-1185, G002/GR-92-1186, and E,G002/M-22-254, ORDER (November 2, 2022).

per electric customer class for each refund element, along with a combined amount. In addition, we will provide a draft customer bill message for the combined refund.

2. Class Allocations

We will allocate the refund dollars to customer class based on how 2022 rate base was allocated using Commission-approved class cost allocation methods in the Company's last rate case.³ Please see Attachment D for the allocations to class for the NOL refund. We plan to refund customers with active and final accounts based upon their 2022 usage.

3. Refund Timing

We discuss timing of the combined refund to electric customers in our Property Tax True-Up Report. We will file a compliance report summarizing the results of the combined refund to electric customers within 30 days of completing the refund process.

4. Bill Message

The bill message for the combined refund to electric customers will be discussed in our Property Tax True-Up Report.

CONCLUSION

Xcel Energy respectfully submits this compliance filing to the Commission:

- Demonstrating our compliance with the NOL Agreement;
- Explaining the changes in our actual and projected DTA balances; and
- Providing a detailed explanation of the 2022 annual activity.

Dated: November 3, 2023

Northern States Power Company

³ Docket No. E002/GR-21-630, FINAL RATES COMPLIANCE, Schedule 2B, Page 1, Line 21 (October 17, 2023).

Northern States Power Company Minnesota Retail Electric Jurisdiction

Company Northern States Power Company

Electric Utility Net Operating Loss Related Deferred Tax Asset Balances - Minnesota Jurisdiction (1) For Year Ended 12/31/22 (\$000s)

	2021 Compliance <u>Report (2)</u>	Net <u>Change (3)</u>	2022 Annual <u>Report</u>	
EOY Unused Deduction Balance	0	0	0	
Deferred Tax Asset - Unused Deductions Deferred Tax Asset - Unused Credits	0 <u>491,572</u>	0 <u>180,744</u>	0 <u>672,315</u>	
Total (EOY Rate Base)	491,572	180,744	672,315	

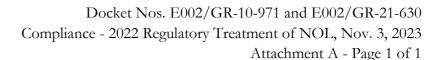
Notes

(1) Detailed supporting documentation will be provided in the compliance report.

(2) Adjusted to align other rate base items that were included in the MYRP for comparison purposes.

(3) Includes Sec. 172(f) carryback (if applicable), prior tax return and current period activity as allocated to the Minnesota jurisdiction.

Source MN Juris NOL Worksheet





Page E-14B

Northern States Power Company Minnesota Retail Electric Jurisdiction Net Operating Loss (NOL) Related Deferred Tax Asset Balance Reporting Prior Period Reported Results Dollars in thousands

	2010 YE	2011	2011 YE	2012	2012	2013	2013	2014	2014	2015	2015	2016	2016
	Ann Rpt	Annual	Ann Rpt	Annual	An Rpt	Annual	An Rpt	Annual	An Rpt	Annual	An Rpt	Annual	An Rpt
	Balance	Activity	Balance	Activity	Balance	Activity	Balance	Activity	Balance	Activity	Balance	Activity	Balance
EOY Unused Deduction Balance	232,103	356,584	588,687	(173,629)	415,058	210,670	625,729	(232,642)	393,087	251,151	644,238	(137,676)	506,562
Tax Effect of Deduction Balance	94,853	145,369	240,222	(70,890)	169,332	86,037	255,369	(95,102)	160,267	102,465	262,732	(56,130)	206,602
EOY Unused Credit Balance	9,958	17,078	27,036	18,482	45,518	25,188	70,706	26,857	97,563	28,211	125,773	55,373	181,146
Total (EOY Rate Base)	104,812	162,447	267,258	(52,408)	214,850	111,225	326,075	(68,245)	257,830	130,675	388,505	(757)	387,748
			-	-			-						
	2016	2017	2017 YE	2017	2018	2018 YE	2019	2019 YE	2020	2020 YE	2021	2021 YE	
	An Rpt	Annual	Ann Rpt	TCJA	Annual	Ann Rpt	Annual	Ann Rpt	Annual	Ann Rpt	Annual	Ann Rpt	
	Balance	Activity	Balance	Reprice	Activity	Balance	Activity	Balance	Activity	Balance	Activity	Balance	
EOY Unused Deduction Balance	506,562	(340,611)	165,952	0	(165,952)	0	0	0	0	0	0	0	
Tax Effect of Deduction Balance	206,602	(139,129)	67,473	(21,135)	(46,339)	(0)	0	(0)	0	(0)	0	(0)	
EOY Unused Credit Balance	<u>181,146</u>	<u>74,241</u>	<u>255,386</u>	0	45,164	300,550	2,506	303,056	63,988	367,044	124,528	491,572	
Total (EOY Rate Base)	387,748	(64,888)	322,860	(21,135)	(1,175)	300,550	2,506	303,056	63,988	367,044	124,528	491,572	

Docket Nos. E002/GR-10-971 and E002/GR-21-630 Compliance - 2022 Regulatory Treatment of NOL, Nov. 3, 2023 Attachment B - Page 1 of 3

Northern States Power Company Minnesota Retail Electric Jurisdiction Net Operating Loss (NOL) Related Deferred Tax Asset Balance Reporting Current Period Balance Activity

Dollars in thousands

	(a)	(b)	(c)	(d)	(e)	(f)	
	Balance	2022	2 Annual Acti	vity		Balance	
	(1)	(2)	(3)	(4)	(5) = (2) + (3) + (4)	(6)=(1)+(5)	
	2021	2022	2022	2022	Total	2022	
	An Rpt	Sec 172(f)	Prior	Annual	Annual	An Rpt	
	Balance	Utilization	Returns	Solve	Activity	Balance	
ed Deduction Balance	0		44,859	(44,859)	0	0	
Effect of Deduction Balance	0		12,548	(12,548)	0	0	
ed State Credits	0			0	0	0	
ed Federal Credit Balance	491,572			180,744	180,744	672,315	Average Bal
(EOY Rate Base)	491,572	0	12,548	168,196	180,744	672,315	581,943
osite Tax Rate			0.27972	0.27972			
	ed Deduction Balance Effect of Deduction Balance ed State Credits ed Federal Credit Balance (EOY Rate Base) posite Tax Rate	Balance(1)2021An RptBalanceed Deduction Balanceed State Creditsed Federal Credit Balance(EOY Rate Base)491,572	Balance2022(1)(2)20212022An RptSec 172(f)BalanceUtilizationed Deduction Balance0ed State Credits0ed Federal Credit Balance491,572(EOY Rate Base)491,572	Balance2022 Annual Acti(1)(2)(3)202120222022An RptSec 172(f)PriorBalanceUtilizationReturnsed Deduction Balance044,859Effect of Deduction Balance012,548ed State Credits0491,57212,548(EOY Rate Base)491,572012,548	Balance 2022 Annual Activity (1) (2) (3) (4) 2021 2022 2022 2022 An Rpt Sec 172(f) Prior Annual Balance Utilization Returns Solve ed Deduction Balance 0 44,859 (44,859) ed State Credits 0 12,548 (12,548) 0 491,572 180,744 180,744 (EOY Rate Base) 491,572 0 12,548 168,196	Balance 2022 Annual Activity (1) (2) (3) (4) (5) = (2)+(3)+(4) 2021 2022 2022 2022 Total An Rpt Sec 172(f) Prior Annual Annual Balance Utilization Returns Solve Activity ed Deduction Balance 0 44,859 (44,859) 0 Effect of Deduction Balance 0 12,548 (12,548) 0 ed State Credits 0 12,548 180,744 180,744 (EOY Rate Base) 491,572 0 12,548 168,196 180,744	Balance 2022 Annual Activity Balance (1) (2) (3) (4) (5) = (2)+(3)+(4) (6)=(1)+(5) 2021 2022 2022 2022 2022 Total 2022 An Rpt Sec 172(f) Prior Annual An Rpt Balance Utilization Returns Solve Activity Balance ed Deduction Balance 0 44,859 (44,859) 0 0 0 ed State Credits 0 12,548 (12,548) 0 0 0 ed Federal Credit Balance 491,572 0 12,548 168,196 180,744 672,315

	Minnesota Retail Jurisdiction	
	2022 Capital Structur	<u>re</u>
(7)	Weighted Cost of Debt	1.99%
(8)	Weighted Cost of Equity	4.87%
(9)	Composite Cost of Capital	6.86%
(10)	Federal Tax Rate	21.00%
(11)	Current Tax Rate (CTR)	28.74%
(12)	RR Conversion Factor	1.403351

			(g)	(h)	(i)	(j)
			Beginning	Sec 172 (f)	Prior	Current
		NOL/DTA Revenue Requirements	Balance	Utilization	Returns	Year Solve
(13)	Row (5) (Reverse sign)	NOL Deferred Tax Asset Utilization (Build-up)		0	(12,548)	(168,196)
(14)	Row (5) (Current year amounts $1/2$)	Impact on Average Rate Base	491,572	0	6,274	84,098
(15)	Row (14) * Composite Cost of Capital (Row (9) Col (b))	Required Operating Income (Expense)	33,722	0	430	5,769
(16)	Row (13) (current year activity)	Deferred Tax				(168,196)
(17)	Weighted cost of debt * Average RB (Row (7) Col (b) * Row (14))	Debt Return	9,782	0	125	1,674
(18)	(Row (1) - Row (17)) * CTR + Row (4) + Row (3) * (1 - Federal Tax Rate)	Current Tax	(2,812)	0	(36)	167,369
(19)	- Row (16) - Row (18)	Operating Income (Expense)	2,812	0	36	827
(20)	Row (15) - Row (19)	Operating Income Deficiency (Sufficiency)	30,910	0	395	4,943
(21)	Row (20) * Revenue Conversion Factor (Row (12) Col (b)) Annua	al Revenue Requirement Increase (Reduction)	43,378	0	554	6,936
(22)	$\operatorname{Col}(h) + \operatorname{Col}(i) + \operatorname{Col}(j)$			2022 Net Ann	ual Amount	7,490

Northern States Power Company Minnesota Retail Electric Jurisdiction Net Operating Loss (NOL) Related Deferred Tax Asset Balance Reporting Current Period Balance Activity Dollars in thousands

Docket Nos. E002/GR-10-971 and E002/GR-21-630 Compliance - 2022 Regulatory Treatment of NOL, Nov. 3, 2023 Attachment B - Page 3 of 3

		(a)	(b)	(c)	(d)	(e)	(f)	
		Balance	2022	Annual Activ	vity		Balance	
		(1)	(2)	(3)	(4)	(5) = (2) + (3) + (4)	(6)=(1)+(5)	
		2022 Test Year	2022	2022	2022	Total	2022	
		Beginning	Sec 172(f)	Prior	Annual	Annual	An Rpt	
		Balance	Utilization	Returns	Solve	Activity	Balance	
(1)	Unused Deduction Balance	0		0	40,956	40,956	40,956	
(2)	Tax Effect of Deduction Balance	0		0	11,468	11,468	11,468	
(3)	Unused State Credits	0			1,258	1,258	1,258	
(4)	Unused Federal Credit Balance	502,865			193,216	193,216	696,081	Average Bal
(5)	Total (EOY Rate Base)	502,865	0	0	205,943	205,943	708,807	605,836
(6)	Composite Tax Rate				0.28001	0.28001		

Minnesota Retail Jurisdiction	
2022 Capital Structure	
Weighted Cost of Debt 1.9	8%
Weighted Cost of Equity 4.8	6%
Composite Cost of Capital 6.8	4%
Federal Tax Rate 21.0	00%
Current Tax Rate (CTR) 28.	74%
RR Conversion Factor 1.40	3351
	Weighted Cost of Debt1.9Weighted Cost of Equity4.8Composite Cost of Capital6.8Federal Tax Rate21.0Current Tax Rate (CTR)28.7

			(g)	(h)	(i)	(j)
			Beginning	Sec 172 (f)	Prior	Current
		NOL/DTA Revenue Requirements	Balance	Utilization	Returns	Year Solve
(13)	Row (5) (Reverse sign)	NOL Deferred Tax Asset Utilization (Build-up)		0	0	(205,943)
(14)	Row (5) (Current year amounts $1/2$)	Impact on Average Rate Base	502,865	0	0	102,971
(15)	Row (14) * Composite Cost of Capital (Row (9) Col (b))	Required Operating Income (Expense)	34,396	0	0	7,043
(16)	Row (13) (current year activity)	Deferred Tax				(205,943)
(17)	Weighted cost of debt * Average RB (Row (7) Col (b) * Row (14))	Debt Return	9,957	0	0	2,039
(18)	(Row (1) - Row (17)) * CTR + Row (4) + Row (3) * (1 - Federal Tax Rate)	Current Tax	(2,862)	0	0	205,396
(19)	- Row (16) - Row (18)	Operating Income (Expense)	2,862	0	0	547
(20)	Row (15) - Row (19)	Operating Income Deficiency (Sufficiency)	31,534	0	0	6,496
(21)	Row (20) * Revenue Conversion Factor (Row (12) Col (b)) Annu	al Revenue Requirement Increase (Reduction)	44,254	0	0	9,117
(22)	$\operatorname{Col}(h) + \operatorname{Col}(i) + \operatorname{Col}(j)$		2	022 Net Annu	ual Amount	9,117

Northern States Power Company

Total Electric Utility and Minnesota Retail Electric Jurisdiction 2022 COSS Total Tax Depreciation, Removal & Other Dollars in thousands Docket Nos. E002/GR-10-971 and E002/GR-21-630 Compliance - 2022 Regulatory Treatment of NOL, Nov. 3, 2023 Attachment C - Page 1 of 1

	Total	Minnesota
	Company	Jurisdiction
	<u>Electric</u>	<u>Electric</u>
Bonus Tax Depreciation	18,056	15,697
MACRS Tax Depreciation	1,282,162	1,113,130
Pre-MACRS Tax Depreciation	33,538	28,890
Removal, Repair and Other	<u>95,929</u>	<u>83,740</u>
Total Capital Asset Accounting Data Feed	1,429,685	1,241,458
New Business CIAC Adjustment	(62)	(62)
Meals & Entertainment	913	797
Nuclear Outage Tax Expense	27,113	23,633
Net Operating Loss (NOL)	<u>36,746</u>	<u>44,859</u>
2022 COSS Tax Depreciation & Removal	1,494,395	1,310,683

Northern States Power Company Electric Utility - State of Minnesota

Docket Nos. E002/GR-10-971 and E002/GR-21-630 Compliance - 2022 Regulatory Treatment of NOL, Nov. 3, 2023 Attachment D - Page 1 of 2

Minnesota Electric NOL Refund for 2022

2022 MN Electric NOL Refund	\$1,626,909				
Interest ¹	<u>\$32,950</u>				
Total Refund	\$1,659,859				
	А	B = A %	C = Refund x B	D	E = C / D
	2022	Revenue	NOL	2022	Estimated
	Rate Base	Refund	Refund	Est. Average	Average Refund
Customer Class	Allocator (\$000) ²		• • •		
	Anocator (\$000)	<u>Allocator</u>	<u>Allocation</u>	<u>Customers</u>	<u>per Customer</u>
Residential	\$4,638,927	<u>Allocator</u> 42.47%	Allocation \$704,943	<u>Customers</u> 1,198,325	per Customer \$0.59
Residential	\$4,638,927	42.47%	\$704,943	1,198,325	\$0.59
Residential Commercial Non Demand	\$4,638,927 \$347,045	42.47% 3.18%	\$704,943 \$52,738	1,198,325 88,140	\$0.59 \$0.60

¹ Refund Interest accrued from November 4, 2023 through the month immediately preceding the month when the Company issues the refund to ratepayers. Final refund interest will be determined when the refund is conducted.

² Docket No. E002/GR-21-630, Final Rates Compliance, October 17, 2023, Attachment 2B, Page 1 of 27, Line 21

Northern States Power Company Electric Utility - State of Minnesota

Docket Nos. E002/GR-10-971 and E002/GR-21-630

Compliance - 2022 Regulatory Treatment of NOL, Nov. 3, 2023

Attachment D - Page 2 of 2

Minnesota Electric NOL Refund for 2022 Interest Calculation¹

	A = prior month C + prior month G	В	C = A + B	D = (A + C) / 2	E	F	G = D * E * F / 365
Revenue	Beginning	Refund	Ending	Average		Annual	Monthly
<u>Month</u>	<u>Balance</u>	Principal	<u>Balance</u>	<u>Balance</u>	<u>Days</u>	Interest ²	<u>Interest</u>
Nov-23	\$0	\$1,626,909	\$1,626,909	\$813,454	27	3.73%	\$2,244
Dec-23	\$1,629,153	\$0	\$1,629,153	\$1,629,153	31	3.73%	\$5,161
Jan-24	\$1,634,314	\$0	\$1,634,314	\$1,634,314	31	3.73%	\$5,177
Feb-24	\$1,639,492	\$0	\$1,639,492	\$1,639,492	29	3.73%	\$4,859
Mar-24	\$1,644,351	\$0	\$1,644,351	\$1,644,351	31	3.73%	\$5,209
Apr-24	\$1,649,560	\$0	\$1,649,560	\$1,649,560	30	3.73%	\$5,057
May-24	\$1,654,617	\$0	\$1,654,617	\$1,654,617	31	3.73%	\$5,242

Total Interest

\$32,950

¹ Refund Interest accrued from November 4, 2023 through the month immediately preceding the month when the Company issues the refund to ratepayers. Final refund interest will be determined when the refund is conducted.

² Commission-ordered cost of short-term debt in Docket No. E002/GR-21-630 is 3.73% for 2022.

CERTIFICATE OF SERVICE

I, Ella Giefer, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

- <u>xx</u> by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota
- \underline{xx} electronic filing

DOCKET NOS. E002/GR-21-630 E002/GR-10-971

Dated this 3rd day of November 2023

/s/

Ella Giefer Regulatory Administrator

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