

**STATE OF MINNESOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION**

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

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 Minnesota

DOCKET NO. E-002/GR-12-961

**COMMENTS OF THE OFFICE  
OF THE ATTORNEY GENERAL**

The Office of the Attorney General–Residential Utilities and Antitrust Division (“OAG”) respectfully submits these Comments regarding the Business Incentive and Sustainability (“BIS”) Rider Compliance Filing filed by Northern States Power Company (“Xcel” or “the Company”) on January 27, 2016. The OAG does not object to the Electric Service Agreements of the four customers who wish to join the BIS Rider program, as it appears that Xcel is properly administering an existing tariff. To the extent that there are any concerns about the structure and function of the BIS Rider, the OAG will continue its analysis and bring any problems to the Commission’s attention in Xcel’s pending rate case in Docket 15-826. In the context of this Compliance Filing, however, the OAG has several suggestions about how Xcel could improve BIS Rider compliance filings in the future.

**I. BACKGROUND INFORMATION.**

Xcel’s BIS Rider was first proposed in the Company’s 2012 rate case, Docket 12-961. The Company suggested that the purpose of the BIS Rider was to offer incentives, in the form of rate discounts, to business customers to increase their energy consumption.<sup>1</sup> The Company

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<sup>1</sup> Direct Testimony of Allen D. Krug, *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E-002/GR-12-961, at 23 (Nov. 2, 2012).

indicated that it would benefit all customers because it would be good for the economy and job creation, create additional local taxes, and lower the average cost of service for all customers.<sup>2</sup> The Company also stated that the BIS Rider would be an improvement on the Competitive Service, Competitive Market, and Area Development Riders because it would be available to all business customers, rather than only those who had competitive alternatives or were located in economically depressed areas.<sup>3</sup> The BIS Rider was approved with limited modifications.

According to the tariff, the BIS Rider is available to all new or existing demand-metered customers who add at least 350 kW of Qualified Billing Demand at a single delivery point.<sup>4</sup> Eligible customers who wish to join the BIS Rider are required to do two things: (1) sign an ESA for a period of six years, and (2) permit the Company to conduct an energy audit and participate in the Energy Assistance Design program.<sup>5</sup> In return, the customer receives a 40 percent reduction to their demand charge for the first three years of the ESA, a 20 percent reduction for the fourth year, and a 10 percent reduction in the fifth year. For context, Xcel's current tariffed Demand Charge per Month per kW for General Service and General Service Time-of-Day customers is \$8.98 from October to May and \$12.86 per month from June to September.<sup>6</sup>

Xcel cooperates with economic development organizations to offer and market the BIS Rider discount to customers who may increase their consumption. In the approximately 2.5 years since the BIS Rider was approved, the Company has provided the BIS discount to only one customer. In this compliance filing, the Company states that four new customers will join the BIS Rider program. In addition, the Company disclosed through discovery responses that it

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<sup>2</sup> *Id.*

<sup>3</sup> *Id.*

<sup>4</sup> Northern States Power Company, Minnesota Electric Rate Book, Section 5, Original Sheet No. 139.

<sup>5</sup> *Id.*

<sup>6</sup> Northern States Power Company, Minnesota Electric Rate Book, Section 5, 26th Revised Sheet No. 26.

anticipates adding between five and ten new customers to the BIS Rider program during 2016, and has been in contact with as many as 51 customers about the BIS Rider discounts.<sup>7</sup>

## **II. XCEL SHOULD PROVIDE ADDITIONAL INFORMATION IN FUTURE COMPLIANCE FILINGS.**

Future BIS Rider compliance filings could be improved if Xcel provides several types of additional information. First, Xcel should provide information about the cumulative generation capacity that is necessary to serve the new load incentivized by the BIS Rider and its relationship to the Company's overall generation requirements. In response to OAG information requests, the Company stated that the cumulative generation requirement for the four ESAs is 17 MW.<sup>8</sup> Xcel stated in its Compliance Filing that it currently has excess generation capacity, but it would be helpful for the Commission to understand the impact that the new consumption incentivized by the BIS Rider discounts has on the Company's future generation requirements, especially since the Company anticipates increasing the number of customers on the BIS Rider in the future.

Second, the Company should provide information about the relationship between customers added to the BIS Rider and any sales forecasts provided for pending rate cases or other dockets involving sales forecasting. While it may not always be true, it is possible that customers increasing consumption in response to BIS Rider incentives could have a material impact on the Company's sales forecasting. For example, the Company indicated in an Information Request that an adjustment was made to its rate case forecast for one company, that another was not adjusted because it was included implicitly, and that two other companies were

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<sup>7</sup> OAG Information Request 1000, Attachment A.

<sup>8</sup> OAG Information Request 1009, Attachment B.

not addressed because the ESAs were not decided at the time the forecast was completed.<sup>9</sup> To improve transparency, this type of information should be made available when there are pending dockets involving sales forecasts.

Third, the Company should provide more information about the energy audit and other sustainability efforts required by the language of the BIS Rider tariff. While the incentives are one feature of the BIS Rider, the tariff also requires companies seeking discounts to participate in sustainability and conservation programming. Xcel provided a more complete explanation in response to discovery by the OAG,<sup>10</sup> but it would improve transparency to provide a thorough discussion in any future compliance filing. Providing more information about the process, where each customer is in the process, and any conservation action taken by the BIS customers, would be beneficial in judging the overall success of the BIS Rider and how well it serves the State's goal of encouraging energy conservation.

Fourth, Xcel should provide more information about the impact of the BIS Rider discount on incentivizing new energy consumption by business customers. The BIS Rider discount is intended to incentivize business customers to increase their consumption so that it benefits all ratepayers, but without more information it is not possible to tell whether the design of the discount is calibrated for maximum efficiency. It is possible that some customers would have increased their consumption the same amount with a lower BIS Rider discount, and it is also possible that a higher (or at least different) BIS Rider discount would create more benefit for all ratepayers. Providing the Commission with more information about how customers responded to the BIS Rider discount, and how Xcel determined it was not offering unnecessary discounts, would help the Commission to improve the efficiency of the BIS Rider for the future.

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<sup>9</sup> OAG Information Request 1005, Attachment C.

<sup>10</sup> OAG Information Request 1001, Attachment D.

Fifth, Xcel should provide information about the “Revenue Recovery” provision of the BIS Rider Tariff. The Revenue Recovery provision provides, “The Company, within a general rate case, is allowed to seek recovery of the difference between the applicable commercial and industrial tariff and this Rider times the usage level during the test year period.”<sup>11</sup> It appears that this provision permits Xcel to seek recovery of the discount provided to BIS Rider customers from Xcel’s other customers during a rate case. Xcel should provide information about whether and how it has sought, or intends to seek, recovery of the shortfall related to the discount from other customer classes.

Finally, Xcel should provide information about the amount of BIS Rider discounts and their financial impact on other classes. Given the increasing number of customers that appear to be interested in the BIS Rider, over time this could result in a measurable cost shift from business customers to residential customers—especially given the broad criteria for availability in the BIS Rider Tariff.

Xcel provided much of this information in response to the OAG’s information requests. While interested parties can continue to seek this information through information requests in the future, it would increase transparency if Xcel would provide it in the initial compliance filings. It would also allow the Commission to have access to the information without relying on interested parties to complete discovery and respond to future compliance filings. In the interest

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<sup>11</sup> Northern States Power Company, Minnesota Electric Rate Book, Section 5, Original Sheet No. 141.

of increasing the transparency of the BIS Rider in the future, the OAG recommends that Xcel provide this additional information with future BIS Rider Compliance Filings.

Dated: February 26, 2016

Respectfully submitted,

LORI SWANSON  
Attorney General  
State of Minnesota

**s/ Ryan P. Barlow**  
RYAN P. BARLOW  
Assistant Attorney General  
Atty. Reg. No. 0393534

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Xcel Energy

Docket No.: E002/GR-12-961

Response To: Office Of The Attorney                      Information Request No. 1000  
General

Requestor: Ryan Barlow

Date Received: February 1, 2016

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Question:

For all responses show amounts for Total Company and the Minnesota jurisdictional electric company unless indicated otherwise. Total Company is meant to include costs incurred by Xcel Energy Services and NSP Minnesota, both regulated and non-regulated operations.

Provide the following information:

1. Describe Xcel's efforts to market the Business Incentive and Sustainability Rider.
2. How many customers has Xcel contacted regarding the BIS Rider?
3. How many customers have contacted Xcel about the BIS Rider?
4. Is Xcel currently aware of any customer who may join the BIS Rider in the future?

Response:

1. Since approval of the Business Incentive and Sustainability Rider, Xcel Energy has worked with various Economic Development Organizations (Minnesota Department of Employment and Economic Development, Greater MSP, Greater St. Cloud Development Corporation, etc.) to help market the rider. Xcel Energy's Economic Development representatives routinely work with the above mentioned economic development organizations, along with attending regional and national trade show events, where they meet with

prospective customers about growing their business in Minnesota. We have also reached out to our local communities (through the work of our Community Relations Managers) to assist those communities with either attracting new businesses or retaining existing customers that are looking to expand their business. Xcel Energy also has Account Managers, who assist with any business retention and expansion activities with existing customers.

2. Xcel Energy has worked with 148 customers or prospective customers since the Company proposed the BIS Rider. When it appears a customer may qualify for the BIS Rider, we will describe the BIS Rider as a tool to help attract or retain that customer. Of the nearly 148 customers or prospective customers, 51 have discussed the BIS Rider as a tool in the overall business growth process.
3. Since customer contact can come from many areas, the Company does not have an exact count of the number of customers that have contacted the Company about the BIS Rider. We estimate roughly 20% of the 51 customers or prospective customers initiated the conversation regarding the BIS Rider. Often times inquiries come through partnership organizations, such as economic development organizations, communities, real estate brokers, site consultants, and other government entities.
4. Given the many customers that have expressed interest in the importance of the BIS Rider as a means to grow their business, Xcel Energy anticipates another 5-10 customers will use the BIS Rider in 2016.

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Preparer: Dana Cottrell  
Title: Account Manager-Team Lead  
Department: MN C&I Account Management  
Telephone: 651-229-5513  
Date: February 11, 2016



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Xcel Energy

Docket No.: E002/GR-12-961

Response To: Office Of The Attorney                      Information Request No. 1009  
General

Requestor: Ryan Barlow

Date Received: February 1, 2016

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Question:

For all responses show amounts for Total Company and the Minnesota jurisdictional electric company unless indicated otherwise. Total Company is meant to include costs incurred by Xcel Energy Services and NSP Minnesota, both regulated and non-regulated operations.

What is the cumulative generation requirement for the four new ESAs? Is this requirement reflected in Xcel's pending integrated resource plan?

Response:

The Company notes that the questions raised in this request are related to the benefits and design of the BIS Rider and not to the Company's compliance with an existing tariff. Should the OAG disagree with the current design of this tariff, our current rate case provides the appropriate forum for this discussion.

The cumulative generation requirement for the four new ESAs is estimated to be an incremental load growth of 17 MW.

The Resource Plan does not explicitly adjust the load demand forecast for every expected increase or decrease in individual customer loads. The demand forecast used in the Company's current Resource Plan (Docket No. E002/RP-15-21) was developed for Fall 2014. The Resource Plan demonstrates how the implementation or use of resource options would vary with changes in supply and demand circumstances. The Loads and Resources profile contained in the January 29<sup>th</sup> Supplement - Current Preferred Plan, Table 1, details the annual capacity excess or deficit position for each year of the planning period. The 17 MW load growth identified above is less than the

identified resource surplus for the current 5-year planning period. Future Resource Plans will incorporate load forecasts developed at the time the plan is drafted.

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Preparer: Mary Morrison  
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Date: February 11, 2016

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Xcel Energy

Docket No.: E002/GR-12-961

Response To: Office Of The Attorney                      Information Request No. 1005  
General

Requestor: Ryan Barlow

Date Received: February 1, 2016

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Question:

For all responses show amounts for Total Company and the Minnesota jurisdictional electric company unless indicated otherwise. Total Company is meant to include costs incurred by Xcel Energy Services and NSP Minnesota, both regulated and non-regulated operations.

Are the increased sales as a result of these four ESAs reflected in the Company's pending rate case in docket 15-826? If they are not, why?

Response:

The Company notes that the questions raised in this request are related to the benefits and design of the BIS Rider and not to the Company's compliance with an existing tariff. Should the OAG disagree with the current design of this tariff, our current rate case provides the appropriate forum for this discussion.

At the time the sales forecast for the rate case was developed in July, 2015, the Company had identified expected additional load for Grede, LLC and LeafLine Labs LLC. The Company does not explicitly adjust the sales forecast for every expected increase or decrease in individual customer loads. The Company assessed each expected increase to determine if the amount of the increase was implicitly captured in the sales forecast or if an explicit adjustment should be made to the forecast. We determined that the increase to LeafLine Labs was implicitly reflected in the forecast, while an explicit adjustment was needed and was made for Grede.

At the time the rate case forecast was developed, Advanced Extrusion, Inc. and New Plastics Plus, Inc. had not yet decided to expand in the Company's service territory.

Therefore, the added load for these two customers were not addressed in the sales forecast. We will assess the impact of the added load in our next sales forecast and will capture the impact if the sales true-up proposed by the Company is approved.

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Preparer: Jannell Marks  
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Xcel Energy

Docket No.: E002/GR-12-961

Response To: Office Of The Attorney                      Information Request No. 1001  
General

Requestor: Ryan Barlow

Date Received: February 1, 2016

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Question:

For all responses show amounts for Total Company and the Minnesota jurisdictional electric company unless indicated otherwise. Total Company is meant to include costs incurred by Xcel Energy Services and NSP Minnesota, both regulated and non-regulated operations.

Describe Xcel's efforts to conduct the energy audit required by the BIS Rider Tariff and all procedures in place regarding the required audits.

Response:

Pursuant to the Tariff, three out of the four customers described in our January 27th compliance filing received energy audits. The fourth customer is scheduled to receive their audit in 2016. Prospective BIS Rider customers will typically go through our Energy Design Assistance Program. This program is an audit of a customer's construction plans, designed for customers that are either building a new building or going through a major renovation. This process will occur with a majority of our BIS Rider applicants. However, if the customer doesn't participate in the Energy Design Assistance Program, we require their use of alternative energy conservation programs, such as Process Efficiency and Data Center Efficiency. An account manager supports this activity since it helps to retain and/or expand the business within our service territory, as well as, supports our energy conservation goals.

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Preparer: Dana Cottrell

Title: Account Manager-Team Lead

Department: MN C&I Account Management

Telephone: 651-229-5513  
Date: February 11, 2016



LORI SWANSON  
ATTORNEY GENERAL

# STATE OF MINNESOTA

OFFICE OF THE ATTORNEY GENERAL

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February 26, 2016

Mr. Daniel Wolf, Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

**Re: *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 Minnesota***  
**MPUC Docket No. E-002/GR-12-961**

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matter please find Comments of the Office of the Attorney General–Residential Utilities and Antitrust Division.

By copy of this letter all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

*s/ Ryan Barlow*

RYAN P. BARLOW  
Assistant Attorney General

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Enclosure

# AFFIDAVIT OF SERVICE

**Re: *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 Minnesota***  
**MPUC Docket No. E-002/GR-12-961**

[illegible]

I hereby state that on February 26, 2016, I filed with eDockets *Comments of the Office of the Attorney General–Residential Utilities and Antitrust Division* and served the same upon all parties listed on the attached service list by email, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

s/ Judy Sigal

Judy Sigal

Subscribed and sworn to before me  
this 26th day of February, 2016.

*s/ Patricia Jotblad*

Notary Public

My Commission expires: January 31, 2020.



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