Direct Testimony and Schedules Gary J. O'Hara

Before the Minnesota Public Utilities Commission State of Minnesota

In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota

> Docket No. E002/GR-19-564 Exhibit\_\_\_(GJO-1)

> > **Employee Expenses**

November 1, 2019

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1		I. INTRODUCTION
2		
3	Q.	PLEASE STATE YOUR NAME AND OCCUPATION.
4	Α.	My name is Gary J. O'Hara. I am Vice President of Supply Chain for Xcel
5		Energy Services Inc. (XES or the Service Company), which provides services
6		to Northern States Power Company (Xcel Energy, NSPM, or the Company).
7		
8	Q.	PLEASE SUMMARIZE YOUR QUALIFICATIONS AND EXPERIENCE.
9	Α.	I have over 45 years of experience with Xcel Energy in operations, strategy
10		development, and supply chain management. In my current role, I direct the
11		sourcing and procurement of goods and services for all of Xcel Energy's
12		utility operating companies. I am also responsible for Materials Management,
13		which supports the Transmission, Distribution, Gas, Energy Supply, and
14		Nuclear business areas. Additionally, my responsibilities include managing
15		Xcel Energy's Accounts Payable, Investment Recovery, and Fleet
16		Management functions. My resume is provided as Exhibit(GJO-1),
17		Schedule 1.
18		
19	Q.	WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?
20	Α.	I provide support for the amount of employee expenses requested for
21		recovery in this rate case as well as the Employee Expense Report (EER)
22		Schedules filed by the Company in compliance with Minnesota law and the
23		commitments made in our prior electric rate cases. In the 2011 test year
24		electric rate case (Docket No. E002/GR-10-971), the Company made several

25

commitments to improve the review, tracking, and documentation of

<sup>&</sup>lt;sup>1</sup> Docket No. E-002/GR-10-971, 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.

1		employee expenses. My testimony, the EER Schedules, and data we are
2		providing in this case comply with the commitments made in the 2011 rate
3		case and subsequent rate cases, the Commission's Orders, and Minnesota
4		Statute § 216B.16, subd. 17 (Employee Expense Statute). The EER Schedules
5		are provided in Volume 3 Required Information, Section IV Other Required
6		Information, Tab 2.
7		
8		Additionally, my testimony provides support for the Supply Chain business
9		area's fleet capital investments for 2020-2022. The budgeted capital additions
10		for fleet functions are \$16.5 million in 2020, \$19.4 million in 2021, and \$24.7
11		million in 2022 for the Minnesota electric jurisdiction.
12		
13	Q.	WHAT IS THE EMPLOYEE EXPENSE AMOUNT FOR THE 2020 TEST YEAR?
14	Α.	The Employee Expense Amount for the test year 2020 is approximately \$15.4
15		million for the Minnesota electric jurisdiction. This amount is based on the
16		Company's budgeting process, which is a forward-looking projection of
17		future projects, costs, and operating needs. Employee expenses are part of the
18		overall O&M budgets of our various business areas and the Company does
19		not prepare a separate budget for employee expenses. The Employee Expense
20		Amount of \$15.4 million is the combined amount of employee expenses
21		included in 2020 business area budgets.
22		
23	Q.	WHAT LEVEL OF ADJUSTMENT DOES THE COMPANY PROPOSE TO THIS
24		AMOUNT?
25	Α.	Based on the review of actual employee expense transactions from 2018, we
26		propose an Employee Expense Adjustment of approximately \$1.5 million. As
27		a result of deducting this adjustment from the Employee Expense Amount,

1		we are requesting recovery for approximately \$13.9 million for employee
2		expenses for the test year 2020. The Employee Expense Adjustment consists
3		of transactions that are likely to be non-recoverable and are considered to be
4		representative of such transactions that could occur in 2020. Company
5		witness Mr. Benjamin Halama reflects this \$1.5 million adjustment in his
6		testimony.
7		
8	Q.	How do you propose to recover employee expenses for years 2021
9		AND 2022 OF THE MULTI-YEAR RATE PLAN (MYRP)?
10	Α.	Similar to the test year 2020, the Employee Expense Amount for plan years
11		2021 and 2022 is based on the combined amount of employee expenses
12		included in 2021 and 2022 business area budgets. For plan years 2021 and
13		2022, we modified the test year 2020 Employee Expense Adjustment of
14		approximately \$1.5 million to reflect the changes in the Employee Expense
15		Amount from 2020 to 2021 and from 2021 to 2022. This process resulted in
16		an approximately \$1.5 million adjustment for both 2021 and 2022. The
17		process used to calculate these adjustments is described in more detail in
18		Section IV of my testimony.
19		
20	Q.	Is the methodology to develop the 2020 test year Employee
21		Expense Amount and Employee Expense Adjustment consistent
22		WITH PAST PRACTICE?
23	Α.	Yes. We have used this process - which was largely developed through work
24		with the Office of Attorney General (OAG) - in each of the Company's rate
25		cases since 2010. This methodology is also consistent with the Employee
26		Expense Statute that became effective in May 2010 and its requirement to
27		compile EER Schedules based on the most recently completed fiscal year.

1	Q.	IS THE \$1.5 MILLION EMPLOYEE EXPENSE ADJUSTMENT PROPOSED FOR 2020,
2		2021, AND 2022 COMPARABLE TO THE ADJUSTMENT THE COMPANY PROPOSED
3		IN THE PAST RATE CASES?
4	Α.	Yes. The Employee Expense Adjustment is based on the same process we
5		used to develop the adjustment in our last three rate cases and reflects the
6		commitments we made in the 2011 rate case. Our proposed adjustment of
7		\$1.5 million is comparable to the one we made in the test year 2013 rate case
8		(\$1.6 million, Docket No. E002/GR-12-961), in the test year 2014 rate case
9		(\$1.4 million, Docket No. E002/GR-13-868) and in the test year 2016 rate
10		case (\$1.6 million, Docket No. E002/GR-15-826).
11		
12	Q.	Is the Company seeking recovery for corporate aviation expenses
13		IN THIS CASE?
14	Α.	No, we are not requesting recovery for any corporate aviation expenses in this
15		case. Our 2020, 2021, and 2022 budgeted corporate aviation costs for the
16		Minnesota electric jurisdiction are approximately \$2.1 million per year. In
17		order to exclude this amount from this case, we have made an adjustment of
18		approximately \$2.1 million for 2020, 2021, and 2022, reflected in Mr.
19		Halama's testimony.
20		
21	Q.	Do you provide any additional information related to employee
22		EXPENSES?
23	Α.	Yes. To prepare testimony for this case, we reviewed the discovery related to
24		employee expenses from the test year 2016 rate case. We incorporated some
25		of the issues asked about in that discovery into my testimony through
26		expanded discussion and schedules.
27		

- 1 Q. HOW HAVE YOU ORGANIZED THE REMAINDER OF YOUR TESTIMONY?
- 2 A. My testimony is organized in the following sections:

- Section II: Definition and Governance of Employee Expenses. Discusses the definition of employee expenses, reporting requirements under the Employee Expense Statute, the Company's Travel and Employee Expense Reimbursement Policy 10.2 (Employee Expense Policy), and commitments made in our past rate cases.
  - Section III: *Employee Expense Reporting*. Describes the Company's employee expense reporting and provides details of SumTotal, other systems, and internal controls.
  - Section IV: Employee Expense Amount, Employee Expense Adjustment, and EER Schedules. Explains the statutorily required EER Schedules, the Employee Expense Amount based on business area budgets, and the Employee Expense Adjustment that removes likely unrecoverable expenses from the test year.
  - Section V: Employee Expense Review and Development of EER Schedules. Explains in detail how the actual 2018 employee expense transactions were reviewed to remove items that are likely not recoverable, including key word search and identification of vague business purposes, transactions inconsistent with the Employee Expense Policy, and transactions not generally needed for the provision of utility service.
  - Section VI: Fleet Capital Investments. Supports the Company's budget for fleet capital additions under Supply Chain's Fleet organization.
  - Section VII: Compliance Item on Lobbying Compensation. Describes the Company's compensation for employees engaged in lobbying and explains the costs included and excluded in the rate request.

1		• Section VIII: Conclusion.
2		
3	II.	DEFINITION AND GOVERNANCE OF EMPLOYEE EXPENSES
4		
5	Q.	How does the Company define employee expenses?
6	Α.	Employee expenses are those operation and maintenance (O&M)
7		expenditures that are:
8		(1) tracked in our employee expense reporting system;
9		(2) subject to the guidelines in the Company's Employee Expense Policy;
10		and
11		(3) consistent with the categories set forth in the Employee Expense
12		Statute.
13		
14		Examples of employee expenses are airfare, hotel stays, car rental, mileage on
15		personal vehicles used for work purposes, parking, meals for business
16		purposes, and recognition for the work performed by Company employees to
17		provide safe and reliable service to customers.
18		
19	Q.	IN GENERAL, ARE THE COMPANY'S EMPLOYEE EXPENSES NEEDED FOR THE
20		PROVISION OF UTILITY SERVICE?
21	Α.	Yes. At times, Company business requires that our employees work at
22		locations other than their offices or primary work locations, attend training,
23		or meet with our customers and stakeholders. For example, employees incur
24		expenses when they work in the field to ensure the reliability of the
25		Company's facilities and equipment, manage workers across our eight-state
26		service territory, or travel to attend conferences or training to maintain their

1		knowle	edge base. For these types of activities, Company employees incur
2		expens	es as guided by the Employee Expense Policy.
3			
4	Q.	WHAT	ARE THE STATUTORY REPORTING REQUIREMENTS REGARDING
5		EMPLO	YEE EXPENSES?
6	Α.	The E	mployee Expense Statute provides the primary regulatory reporting
7		require	ments for employee expenses. The statute requires the Company to
8		provide	e, when filing a general rate case, a schedule separately itemizing:
9		(1)	travel and lodging expenses;
10		(2)	food and beverage expenses;
11		(3)	recreational and entertainment expenses;
12		(4)	expenses (and compensation) for board of directors;
13		(5)	expenses (and compensation) for the ten highest paid officers and
14			employees;
15		(6)	dues and expenses for memberships in organizations or clubs;
16		(7)	gift expenses;
17		(8)	expenses related to owned, leased, or chartered aircraft; and
18		(9)	lobbying expenses.
19			
20		For ite	ms (1) and (2), the Company is required to separately provide data for
21		employ	vees who are at the vice president-level and above. Employee expense
22		transac	tion data must be from the most recently completed fiscal year and
23		include	the date, amount, business purpose, and vendor for the expense.
24			
25	Q.	PLEASE	E DESCRIBE THE COMPANY'S EMPLOYEE EXPENSE POLICY?
26	Α.	The Tr	ravel and Employee Expense Reimbursement Policy (Corporate Policy
27		10.2) (	Employee Expense Policy) provides the guidelines applicable to all

1		non-bargaining and bargaining employees who incur travel or other business-
2		related expenses. The current version of the Employee Expense Policy is
3		provided in Exhibit(GJO-1), Schedule 2. The latest revisions to the
4		Employee Expense Policy were made in December 2015 and December 2016.
5		The revisions were made to increase employees' understanding of eligible
6		business purposes and to ensure that managers' approval of employee
7		expense reimbursement aligns with Company policy and budgets. A summary
8		of the changes is provided in Exhibit(GJO-1), Schedule 3.
9		
10	Q.	WHAT COMMITMENTS REGARDING EMPLOYEE EXPENSES DID THE COMPANY
11		MAKE IN ITS 2011 AND 2013 RATE CASES?
12	Α.	During our 2011 rate case (Docket No. E002/GR-10-971), we made a
13		number of commitments to provide more detailed information in the Direct
14		Testimony and to improve the quality of employee expense data to facilitate
15		review of employee expenses in our future rate cases. These commitments
16		are summarized in Exhibit(GJO-1), Schedule 4. Also, in preparing for the
17		test year 2013 rate case (Docket No. E002/GR-12-961), we made some
18		additional commitments in a meeting with the OAG, which are also included
19		in Schedule 4.
20		
21	Q.	HAS THE COMPANY MADE ANY ADDITIONAL COMMITMENTS REGARDING
22		EMPLOYEE EXPENSES IN THE SUBSEQUENT 2014 RATE CASE (DOCKET NO.
23		E002/GR-13-826) OR 2016 RATE CASE (DOCKET NO. E002/GR-15-826)?
24	Α.	No.
25		

8

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1	Q.	Please describe whether the Commission's Orders in the 2013, 2014,
2		AND 2016 RATE CASES ADDRESSED EMPLOYEE EXPENSES?
3	Α.	The Commission's Orders in the 2013 and 2014 rate cases requested more
4		detailed information in future rate cases seeking recovery for corporate
5		aviation costs, but did not otherwise add any new requirements for employee
6		expenses. In the 2013 rate case, the Commission ordered us to provide flight
7		log and passenger information for the most recent 12-month operational
8		period. In the 2014 rate case, the Commission ordered us to provide more
9		detailed records of the actual business purpose for flights that are scheduled,
10		rather than reducing all flights to a generic "code." These requirements are
11		summarized in Exhibit(GJO-1), Schedule 4. The Commission's Order in
12		the 2016 rate case did not add any new requirements for employee expenses.
13		
14		As noted earlier, the Company is not requesting recovery of any corporate
15		aviation expenses in this rate case, and therefore we have not provided any
16		flight log, passenger, or business purpose information. That said, to ensure
17		completeness, we are providing expenses related to corporate aviation in EER
18		Schedule 8, consistent with the Employee Expense Statute.
19		
20	Q.	HAS THE COMPANY FULFILLED ALL ITS COMMITMENTS AND COMMISSION
21		REQUIREMENTS IN DEVELOPING THE EER SCHEDULES AND THE EMPLOYEE
22		EXPENSE AMOUNT AND ADJUSTMENT?
23	Α.	Yes. My Direct Testimony, the EER Schedules, and the actions the Company
24		has taken and continues to take demonstrate our fulfillment of the
25		commitments and requirements established in the prior rate cases.
26		Exhibit(GJO-1), Schedule 4 identifies where each commitment or
27		requirement is addressed in this case. Our employee expense compliance and

1		methodology to develop the Employee Expense Amount and Adjustment
2		have evolved for many years in collaboration with the OAG, are complian-
3		with the Employee Expense Statute, and have resulted in just and reasonable
4		outcomes in past cases and will also do so in this case.
5		
6		III. EMPLOYEE EXPENSE REPORTING
7		
8	Q.	How does the Company track employee expense transactions?
9	Α.	Our main tool to document and manage employee expense transactions is
10		SumTotal. We have used this intranet application system since October 2012
11		Some employee expenses are also reported through the Company's SAP
12		Corporate Passport, and TIME applications. These separate applications are
13		described in more detail below.
14		
15		A. SumTotal
16	Q.	WHAT KIND OF EMPLOYEE EXPENSES ARE REPORTED THROUGH SUMTOTAL?
17	Α.	All bargaining and non-bargaining employees are required to use SumTotal to
18		report and properly account for expenses that are charged to the Company
19		credit card. This is the required payment method for all expenses that can be
20		paid with a credit card. In addition, non-bargaining employees report through
21		SumTotal cash-out-of-pocket expenses that cannot be charged to the
22		Company credit card. Typically, such expenses may include parking, personal
23		car mileage, taxi/bus/other transportation, and tips/tolls.
24		

1	Q.	HOW DOES SUMTOTAL FACILITATE APPROPRIATE EMPLOYEE REPORTING AND
2		MANAGER APPROVAL OF EMPLOYEE EXPENSES?
3	Α.	SumTotal requires detailed information from the employee for all appropriate
4		fields to finish an expense report. The system notifies the user of potential
5		inconsistencies with the Employee Expense Policy and also prompts for
6		missing information. In addition, an electronic copy of all required receipts
7		must be included with the expense report for manager review and approval.
8		All expense reports require at least one next-level management approval.
9		Additionally, if information provided in SumTotal is not in compliance with
10		the Company guidelines, the transaction is flagged for further review by a
11		group within Supply Chain with oversight authority.
12		
13	Q.	DOES THE USE OF SUMTOTAL ALLOW THE COMPANY TO COMPLY WITH THE
14		REPORTING REQUIREMENTS IN THE EMPLOYEE EXPENSE STATUTE?
15	Α.	Yes. SumTotal includes all data fields necessary to comply with the Employee
16		Expense Statute reporting requirements. The transaction date, expense type,
17		expense category, business purpose, line comment, transaction amount, and
18		vendor name fields are populated for data review and analysis.
19		
20	Q.	WHAT SUMTOTAL TRAINING IS AVAILABLE FOR COMPANY EMPLOYEES?
21	Α.	Our online Learning Management System (LMS) has three training modules
22		related to the Employee Expense Policy and SumTotal. All new SumTotal
23		users are required to complete the Travel and Employee Expense Reimbursement
24		training, which focuses on the Employee Expense Policy. Every SumTotal
25		user is also required to take a periodic refresher training on this course. These
26		training materials are provided as Exhibit(GJO-1), Schedule 5A. We also

1		provide optional Create and Submit an Expense Report and Approving an Expense
2		Report courses in LMS.
3		
4	Q.	DOES THE COMPANY PROVIDE OTHER RESOURCES FOR SUMTOTAL USERS?
5	Α.	Yes. In addition to LMS training, since 2013 the Company has provided
6		SumTotal User Forums. These web-based conferences are typically held once
7		a month and offer tips and training on various SumTotal topics. Examples of
8		past User Forum topics include meals, mileage reimbursement, itemization of
9		expenses, system notifications, accounting validation, and rejected expense
10		reports.
11		
12		We also maintain an internal website for travel and employee expenses, which
13		is a one-stop place for employees to find more information on reporting
14		requirements and SumTotal. This website contains, among other things, links
15		to frequently asked questions, forms, job aid manuals, and reference
16		documents. For example, we have published for employees and their
17		managers detailed job aid manuals Creating and Submitting Expense Reports
18		(attached as Exhibit(GJO-1), Schedule 5B) and Approving an Expense Report
19		(attached as Exhibit(GJO-1), Schedule 5C).
20		
21	Q.	WHAT IS THE GOAL OF SUMTOTAL TRAINING AND INFORMATIONAL
22		MATERIALS?
23	Α.	The goal is that our employees understand the Company's Employee Expense
24		Policy and are able to accurately report their business-related expenses with
25		appropriate documentation. Overall, the training and educational materials are
26		designed to teach employees how to use SumTotal's functionality to enter
27		information into expense reports more efficiently and in conformity with the

1		Employee Expense Policy. These materials also educate expense report
2		approvers of the tools available within SumTotal to facilitate their review and
3		approval.
4		
5	Q.	WHAT ADDITIONAL TOOLS AND HELP ARE AVAILABLE FOR EMPLOYEES WHO
6		ARE PREPARING AN EXPENSE REPORT IN SUMTOTAL?
7	Α.	There are two types of additional help available if employees have questions
8		or problems when they are preparing an expense report in SumTotal. First,
9		they can call the Supply Chain hotline. Hotline specialists who answer the
10		phones can view the expense report that is being prepared and give step-by-
11		step directions how to finish it correctly. Second, employees can use an
12		online help tool Job Aid, which was implemented in 2013 in SumTotal.
13		When an employee is preparing an expense report, she or he can point to the
14		Job Aid in SumTotal, which then gives additional information on the specific
15		field.
16		
17	Q.	HAS THE COMPANY MADE ANY RECENT IMPROVEMENTS RELATED TO
18		SUMTOTAL?
19	Α.	Yes. We will update to a newer version of SumTotal in November 2019. This
20		change is mostly a technical upgrade and does not materially impact the
21		preparation of expense reports in the system. The users will not experience
22		significant changes, however, there is a new requirement that receipts must be
23		uploaded separately for each line item; this new requirement is intended to
24		improve the approval process.

1	Q.	DOES SUMTOTAL ALSO INCLUDE TRANSACTIONS THAT ARE NOT CONSIDERED
2		AS EMPLOYEE EXPENSES?
3	Α.	Yes. Employees are directed to use the Company credit card for minor
4		material and service purchases, which are not considered employee expenses.
5		In the normal course of business, these types of items include office supplies,
6		tools, printing services, subscriptions to magazines and information services,
7		and office furniture. Although these credit card transactions are reconciled
8		through SumTotal, they are typical cost-of-doing business expenses not
9		covered by the Employee Expense Statute or the Employee Expense Policy.
10		
11		B. OTHER SYSTEMS
12	Q.	What other Company systems were used in 2018 to report employee
13		EXPENSES?
14	Α.	Some 2018 employee expense transactions can also be found in the
15		Company's SAP, Corporate Passport, and TIME applications. These are
16		enterprise-wide systems that perform multiple functions for our business
17		areas, including processing some non-labor, employee expenses.
18		
19	Q.	PLEASE DESCRIBE SAP.
20	Α.	SAP is a business software package that can integrate all areas of business for
21		financials, manufacturing, logistics, distribution, and so on. The Company
22		uses the SAP software suite for the Company's general ledger as well as work
23		and asset management. SAP applications are used primarily for purchasing,
24		contracts, inventory, accounts payable, labor entry, and design work
25		management. SAP is also the Company's master vendor management
26		reporting system, containing two separate applications, Vendor Invoice

1		Management (VIM) and VIM Nuclear. Specifically, VIM and VIM Nuclear
2		include some employee expense transactions.
3		
4	Q.	WHAT APPLICATIONS DID SAP REPLACE?
5	Α.	SAP replaced the Corporate PassPort and Nuclear PassPort applications. SAP
6		was implemented Company-wide by the end of 2017, although a small
7		number of employee expense transactions were also reported through
8		Corporate Passport in 2018. In total, approximately 550 employee expense
9		transactions were reported through SAP's VIM and Corporate Passport in
10		2018. Additionally, about 40 employee expense transactions were reported
11		through VIM Nuclear, but no transactions were reported through Nuclear
12		Passport in 2018.
13		
14	Q.	PLEASE DESCRIBE TIME.
15	Α.	TIME is the Company's mainframe application used to record all labor time
16		entries, including associated labor costs. The non-labor expense entries
17		reported within this system are incurred by the NSPM union work force
18		across all business areas. Examples of entries are per diems, meal allowances,
19		mileage, site allowance, and safety shoes, uniforms, and other similar charges.
20		These expenses are processed within the TIME system so that they are
21		properly reported to the Internal Revenue Service and included in these
22		employees' annual W2 wage statements.
23		
24	Q.	Do most of the expenses reported through TIME qualify as
25		EMPLOYEE EXPENSES?
26	Α.	No. For bargaining employees, we are required to reimburse the costs of
27		certain expenses according to the terms of applicable collective bargaining

	agreements. A large portion of these payments, which are accounted as
	employee expenses in our general ledger system, are actually labor costs
	incurred as cash payments made pursuant to the collective bargaining
	agreement. As such, they do not qualify as employee expenses under the
	Employee Expense Statute or the Company's Employee Expense Policy. In
	2018, transactions in TIME consisted of per diems (57 percent), meal
	allowances (20 percent), mileage (14 percent), site allowance (6 percent), and
	safety shoes, uniforms, and other charges (3 percent).
Q.	DID THE COMPANY'S EMPLOYEE EXPENSE REVIEW AND PREPARATION OF
	EER SCHEDULES ALSO INCLUDE A REVIEW OF 2018 VIM, CORPORATE
	PASSPORT, VIM NUCLEAR, AND TIME TRANSACTIONS?
Α.	Yes. We conducted a thorough review of VIM, Corporate Passport, VIM
	Nuclear, and TIME data in order to determine which transactions qualified as
	employee expenses and to remove expenses that were considered to be non-
	recoverable. Summary data from these systems is reported separately in EER
	Schedules 10, 11, and 12.
	C. Internal Controls and Monitoring
Q.	How is the Company monitoring compliance with the Employee
	EXPENSE POLICY AND APPROPRIATE REPORTING OF EMPLOYEE EXPENSES?
Α.	We have established several ways to monitor and track appropriate reporting
	of employee expenses: 1) SumTotal Controls; 2) Compliance and Trend
	Reporting; and 3) Internal Audits. I will discuss each of these briefly below.
	A. Q.

Q. Does SumTotal have system-built controls to flag potentially

1

26

2 NON-COMPLIANT EXPENSE REPORTS? 3 Yes. SumTotal advises the approving supervisor and a group within Supply Α. 4 Chain when an expense report may not comply with the Employee Expense 5 Policy. A Supply Chain Administrator will review each flagged expense report 6 and reject it unless it can be corrected to be in compliance with the Company 7 policy and guidelines. A second layer of verification is added by monthly check and balance reviews, which monitor whether the Supply Chain 8 9 Administrators are accurately rejecting or releasing flagged expense reports. 10 11 PLEASE DESCRIBE THE COMPLIANCE AND TREND REPORTING. Q. 12 Α. The Supply Chain organization has developed separate compliance and trend 13 reporting components for the Company's Employee Expense Policy. The 14 purpose of the compliance reporting is to collect monthly statistics and 15 provide more detailed analysis of SumTotal data, such as unclear business 16 purposes or untimely completion of expense reports. Compliance reporting 17 allows us to identify reoccurring problem areas, which may indicate that there is a need to provide more direction and education to our employees. This 18 19 information also helps us to modify and improve our training materials. 20 21 Trend reporting was established to collect and analyze SumTotal data to identify patterns or issues that would merit changes in the Company's 22 23 Employee Expense Policy. For example, trend reporting may show that there 24 is need to add a new expense category or change spending limits for an 25 existing expense category. In addition, we monitor average spending for

certain expenses, for example, meals and hotel fees.

Q. WHAT DOES THE COMPANY DO AFTER IT IDENTIFIES A NON-COMPLIANCE

2		TREND?
3	Α.	We take the opportunity to better educate our employees, typically in two
4		ways. First, and most often, Supply Chain sends informational emails to all
5		employee expense system users. These informational emails offer very
6		specific instructions on how to correct or clarify issues that were identified as
7		a non-compliance trend. Second, Supply Chain may perform supplemental
8		in-person group training at the request of a Business Unit manager.
9		
10	Q.	SINCE THE LAST ELECTRIC RATE CASE, DID AUDIT SERVICES PERFORM ANY
11		AUDITS TO REVIEW THE EMPLOYEE EXPENSE DATA?
12	Α.	Yes. Audit Services reviewed a sample of all employee expense data from year
13		2016 and from year 2017 through November 30, 2017. The Audit Report was
14		issued in March 2018 and focused on verifying that expenses were reimbursed
15		in compliance with the Company policy; assessing whether appropriate
16		controls and reporting tools are in place; analyzing suspicious patterns or
17		anomalies; and, verifying that expense types in SumTotal tie to the
18		appropriate general ledger account.
19		
20	Q.	What did the Audit find?
21	Α.	The Audit Report concluded that the Company's system of controls over
22		employee expenses is effective. Although Audit Services did identify some
23		instances of non-compliance with the Company policy, the number of such
24		instances was minimal and the exceptions insignificant. Examples of non-
25		compliance included splitting transactions, inadequate supporting
26		documentation, and payment of relocation expenses through the employee
27		expense process instead of through SAP. The Audit Report recommended

1		ongoing training and frequent updates to emphasize the approving manager's
2		role in ensuring the necessity and validity of purchases, such as monthly
3		policy highlights. Audit Services did not note any potentially fraudulent
4		transactions.
5		
6		IV. EMPLOYEE EXPENSE AMOUNT, EMPLOYEE EXPENSE
7		ADJUSTMENT, AND EER SCHEDULES
8		
9	Q.	WHAT IS THE EMPLOYEE EXPENSE AMOUNT FOR THE TEST YEAR 2020?
10	Α.	The Employee Expense Amount for the test year 2020 is approximately \$15.4
11		million for the Minnesota electric jurisdiction. This amount is derived from
12		the O&M budgets of our various business areas. The Company does not
13		prepare a separate budget for employee expenses.
14		
15	Q.	How are the business area budgets prepared?
16	Α.	The Company's budgeting process is a forward-looking projection of projects,
17		costs, and operational needs. Each business area develops its own budget as
18		part of the Company's overall budgeting process, which is described in more
19		detail in the Direct Testimony of Company Witness Mr. Gregory J. Robinson.
20		In general, business area budgets are organized using "cost elements," and
21		certain accounts include planned expenditures for the types of expenses that
22		are listed in the Employee Expense Statute. The sum of the amounts
23		budgeted for these accounts constitutes the Employee Expense Amount for
24		the test year.
25		

1	Q.	WHAT IS THE EMPLOYEE EXPENSE ADJUSTMENT?
2	Α.	The Employee Expense Adjustment for the test year 2020 is based on a
3		review of actual 2018 employee expense transactions. The purpose is to
4		identify and remove transactions that are not generally needed for providing
5		utility service and are likely non-recoverable based on our experience in prior
6		rate cases, such as transactions that are inconsistent with our Employee
7		Expense Policy guidelines, related to entertainment or life event celebrations,
8		or have vague business purposes. The transactions that are included in the
9		Employee Expense Adjustment are considered to be representative of such
10		transactions that could occur in 2020, and are therefore subtracted from the
11		Employee Expense Amount.
12		
13	Q.	WHAT IS THE AMOUNT OF EMPLOYEE EXPENSES THE COMPANY IS
14		REQUESTING TO RECOVER FOR THE TEST YEAR 2020?
15	Α.	After the Company's proposed Employee Expense Adjustment
16		(approximately \$1.5 million) is deducted from the proposed Employee
17		Expense Amount (approximately \$15.4 million), we are requesting recovery of
18		approximately \$13.9 million for employee expenses for the Minnesota electric
19		jurisdiction for the test year 2020.
20		
21	Q.	How did the Company prepare the Employee Expense Amount for
22		MYRP YEARS 2021 AND 2022?
23	Α.	The Employee Expense Amount for plan years 2021 and 2022 was developed
24		the same way as for the test year 2020, based on the combined amount of
25		employee expenses included in 2021 and 2022 business area budgets. The
26		Employee Expense Amount for the Minnesota electric jurisdiction is

approximately \$15.6 million for 2021 and \$15.1 million for 2022.

Q. HOW DID THE COMPANY PREPARE THE EMPLOYEE EXPENSE ADJUSTMENT

2		FOR MYRP YEARS 2021 AND 2022?
3	Α.	The Employee Expense Adjustment of \$1.5 million for 2020 is based on the
4		review of actual expenses from the last full fiscal year, which is currently 2018
5		To determine the Employee Expense Adjustment for 2021 and 2022, we
6		examined how the Employee Expense Amount (based on business area
7		budgets) changes from 2020 to 2021 and from 2021 to 2022, and then
8		modified the Employee Expense Adjustment to follow proportionally that
9		change. In other words, if the Employee Expense Amount for example
10		increases from 2020 to 2021 by 5 percent, then we would increase the
11		Employee Expense Adjustment by 5 percent for 2021.
12		
13	Q.	WHAT IS THE EMPLOYEE EXPENSE ADJUSTMENT FOR THE PLAN YEARS 2021
14		AND 2022?
15	Α.	The Employee Expense Amount increases from 2020 to 2021 by 1.3 percent
16		and decreases from 2021 to 2022 by 3.4 percent. When these percentages are
17		applied to the Employee Expense Adjustment, it results in an approximately
18		\$1.5 million adjustment (after rounding) for each of plan years 2021 and 2022.
19		
20	Q.	What is the amount of employee expenses the Company is
21		REQUESTING TO RECOVER FOR PLAN YEARS 2021 AND 2022?
22	Α.	After the Employee Expense Adjustment is deducted from the Employee
23		Expense Amount, we are requesting recovery of approximately \$14.1 million
24		for plan year 2021 and \$13.6 million for plan year 2022. Table 1 below
25		summarizes the Employee Expense Amount, Employee Expense Adjustment
26		and the resulting amount of employee expenses that the Company is seeking
27		to recover for 2020, 2021, and 2022.

Table 1

Employee Expense Amount, Employee Expense Adjustment, and Requested Recovery for 2020, 2021, and 2022

Year	Employee Expense Amount (\$ 000's)	Employee Expense Adjustment (\$ 000's)	Request for Recovery (\$ 000's)
2020	15,378	1,486	13,892
2021	15,580	1,505	14,075
2022	15,056	1,455	13,601

Α.

Q. PLEASE PROVIDE DATA ON THE EMPLOYEE EXPENSE AMOUNTS AND THE ACTUAL EMPLOYEE EXPENSES FOR THE PAST FIVE YEARS.

Table 2 below provides data on the employee expense amounts (based on business area budgets) and actual employee expenses for 2014-2018 for the Minnesota electric jurisdiction. This data suggests that the Company's business areas have cumulatively done a reasonably accurate job of budgeting for their employee expenses — over the past five years, the total actual employee expenses were within 2.3 percent of the total employee expense amounts. The actuals exceeded the budgeted amounts in 2014, 2015, and 2018, while the actuals came under the budgeted amounts in 2016 and 2017. Employee expenses are somewhat volatile to market conditions (e.g., airfare and hotel prices) and also fluctuate based on some unpredictable Company needs and commitments, such as mutual aid requirements to assist other utilities in national emergencies. Exhibit\_\_\_(GJO-1), Schedule 6 provides additional data by employee expense category for 2016-2018.

Table 2

Employee Expense Amount vs. Actual Employee Expenses, 2014-2018<sup>2</sup>

	Employee Expense Amount (\$ 000's)	Actual Employee Expenses (\$ 000's)	\$ Variance Over (Under) (\$ 000's)	% Variance Over (Under)
2014	16,511	17,625	1,114	6.7%
2015	16,609	16,647	38	0.2%
2016	16,655	14,237	(2,418)	(14.5%)
2017	<b>15,17</b> 0	13,922	(1,248)	(8.2%)
2018	14,558	15,256	698	4.8%
Five year total	79,503	77,687	(1,816)	(2.3%)

Α.

#### Q. WHAT ARE THE EER SCHEDULES?

The Employee Expense Statute requires that a rate case filed by a public utility must include a schedule that separately itemizes certain employee expense categories. This employee expense transaction data must be from the most recently completed fiscal year and include the date, amount, business purpose, and vendor for the expense. After we reviewed all actual 2018 employee expense data and removed items that we believed were not recoverable (e.g., the Employee Expense Adjustment), the remaining transactions were arranged into EER Schedules required by the Employee Expense Statute. A list of the EER Schedules is attached as Exhibit\_\_\_(GJO-1), Schedule 7. The complete EER Schedules are provided in Volume 3 Required Information, Section IV Other Required Information, Tab 2.

<sup>&</sup>lt;sup>2</sup> Amounts are unadjusted (e.g., without any employee expense adjustment) and are for the Minnesota electric jurisdiction.

#### 1 V. EMPLOYEE EXPENSE REVIEW AND DEVELOPMENT OF EER

2		SCHEDULES
3		
4		A. Employee Expense Review Process
5	Q.	In general, how did the Company review employee expenses and
6		DEVELOP THE EER SCHEDULES?
7	Α.	We followed the same methodology as was used in our last three rate cases:
8		test year 2013 (Docket No. E002/GR-12-961), test year 2014 (Docket No.
9		E002/GR-13-868), and test year 2016 (Docket No. E002/15-826).
10		
11	Q.	What data did the Company review and use to prepare the EER
12		SCHEDULES?
13	Α.	The Employee Expense Statute requires that we provide employee expense
14		data from our last completed fiscal year, which is 2018. We used the full 12
15		months of 2018 data from SumTotal and any other applicable Company
16		systems (e.g., VIM, Corporate Passport, VIM Nuclear and TIME).
17	Q.	WHAT FIELDS DID THE COMPANY EXTRACT FROM SUMTOTAL?
18	Α.	While SumTotal contains many other fields, for this case we extracted fields
19		that were: (1) necessary to develop EER schedules that comply with our
20		interpretation of the requirements in the Employee Expense Statute and our
21		commitments in the prior electric rate cases; and (2) helpful in determining if
22		the expense could be allocated to the Minnesota electric jurisdiction. The raw
23		SumTotal data set includes the corporate credit card transactions and cash
24		reimbursements for all expenses incurred by NSPM and Service Company
25		employees.
26		

1 O. Please describe the process for reviewing SumTota	O.	D. PLEASE DESCRIBE THE PROCESS	FOR REVIEWING SUMTOTAL DATA	?
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A. The process to review SumTotal data is largely manual and involves numerous steps and a line-by-line review of transactions. A detailed explanation of this process is provided in Exhibit\_\_\_(GJO-1), Schedule 8. After extracting the data set described above, we first removed transactions that have no cost assignment or allocation to the Minnesota electric jurisdiction (restricting the data set to approximately 200,000 line items). I note one exception: we preserved all transaction data for entertainment expenses and dues even if not allocable to the Minnesota electric jurisdiction. We did so to remain consistent with the EER Schedules provided in our last electric rate case, which included employee entertainment and dues expense transaction data. We have developed a process that allows us to determine the amount of each transaction's jurisdictional allocation.

From this point, we identified transactions that are not recoverable and are already accounted for below-the-line, or needed to be manually moved below-the-line. Several Company cost element accounts are below-the-line accounts and include expenses related to lobbying, non-recoverable recognition, corporate tickets, and other similar deductions. These non-recoverable, below-the-line transactions were excluded from a further review.

#### 22 Q. What was the Next Step in the SumTotal review process?

A. Next, we searched the remaining transactions (approximately 200,000 lines) for 124 key words, and we also searched them for vague business purposes and other criteria, to determine if there were transactions inconsistent with the Employee Expense Policy or our prior rate case commitments or that were not necessary for the provision of utility service. Our proposed

- Employee Expense Adjustment consists of transactions identified through this effort. Specifically, we included in the adjustment items that were:
  - Identified by our key word search;
  - Considered to have vague business purposes;
- For meals exceeding \$65 per person;
  - For business meals that included only Company employees;
    - Inconsistent with the guidelines in our Employee Expense Policy; and
    - Identified as generally not being needed for the provision of utility service.

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- 11 Q. PLEASE DESCRIBE THE KEY WORD SEARCH.
- 12 Α. Based on our past experience, we developed a list of 124 key words that was 13 used to identify transactions that may not be appropriate for rate recovery. 14 The list was developed specifically to capture expenditures related to sporting 15 and entertainment events, recreation, celebrations, recognitions, life events, international travel and lobbying. The key word list is provided in Table 2 to 16 17 Exhibit\_\_\_(GJO-1), Schedule 8. Transactions initially identified through the key word search were manually reviewed, line-by-line, to determine if the 18 19 transaction qualified as a recoverable employee expense. Some expenses 20 identified through the key word search are "false positives" and nevertheless 21 appropriate for recovery. For example, expenses incurred for vendors such as 22 Holiday Inn Express or Holiday Station Store could be recoverable although 23 matching the search word "holiday." We identified approximately 26,000 24 transactions through the key word search and approximately 10,500, or 40 25 percent, of these transactions were included in the Employee Expense 26 Adjustment. The amount of adjustment based on the key word search is 27 approximately \$486,000.

- 1 Q. Please describe how the Company searched for SumTotal 2 transactions with vague business purposes.
- 3 Α. We first manually reviewed each transaction to assess if the business purpose 4 field, by itself, provided an adequate description to determine the business 5 purpose. If the business purpose was vague, such as "dinner," "travel," or "meeting," we manually reviewed other data fields and examined acronyms 6 7 and abbreviations. If the combined documentation was not sufficient to 8 determine an adequate business purpose, the transaction was flagged for 9 removal. A representative (non-exhaustive) list of 229 acronyms that are 10 commonly used by our employees is provided in Table 3 to Exhibit 11 \_(GJO-1), Schedule 8. The amount of adjustment based on vague business 12 purposes is approximately \$87,000.

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- 14 Q. DID THE COMPANY IDENTIFY EVERY SUMTOTAL TRANSACTION WITH A
  15 VAGUE BUSINESS PURPOSE?
  - A. Identifying vague business purposes is somewhat subjective. While we have made our best effort to identify these transactions, there could be transactions with business purposes others might consider vague. Our Employee Expense Policy provides guidelines for the appropriate documentation of employee expenses, and our employees provide business purposes they believe are reasonable. While an approving manager may find a business purpose reasonable based on knowledge of the work being done by an employee, this business purpose may appear vague to an outside party. We believe that there is always some judgment and subjectivity involved in assessing the business purpose, and do not think that perfection is possible, nor should it be the standard applied. In our review of employee expenses, we conducted a thorough search for vague business purposes and reviewed acronyms and

1		abbreviations included in business purposes when necessary. We believe our
2		effort and the resulting Employee Expense Adjustment are consistent with
3		our commitment in the 2011 rate case.
4		
5	Q.	Are there meals greater than \$65 per person, per day in the EER
6		SCHEDULES?
7	Α.	No. We are not seeking recovery for these transactions, and the EER
8		Schedules do not include meals in excess of \$65 per person per day. Our
9		Employee Expense Policy guidelines require that an employee should not
10		charge for more than \$65 per person, per day for business or travel meals.
11		We have continued to improve compliance with this guideline, but we still
12		identified instances where the meal transactions in SumTotal exceeded the
13		allowable amount. These transactions (approximately \$11,000) are included in
14		the Employee Expense Adjustment.
15		
16	Q.	Are business meals that included only Company employees
17		INCLUDED IN THE EER SCHEDULES?
18	Α.	No. Although we believe there are instances where business meals among
19		employees are necessary, we are not seeking recovery for these transactions
20		and they are also excluded from the EER Schedules, consistent with past
21		practice. Approximately \$467,000 of employee-only business meals reported
22		through SumTotal are included in the Employee Expense Adjustment.
23		
24	Q.	PLEASE DESCRIBE THE REST OF THE SUMTOTAL TRANSACTIONS INCLUDED IN
25		THE EMPLOYEE EXPENSE ADJUSTMENT.
26	Α.	The rest of the Employee Expense Adjustment is comprised of SumTotal

27

transactions that are otherwise inconsistent with our Employee Expense

1		Policy guidelines; do not pertain to the Minnesota electric jurisdiction; or we
2		believe are not needed to provide utility service. Based on our past
3		experience, we conducted a manual line and field review to identify these
4		types of expenses, and any transactions identified by the review were flagged
5		for removal. Approximately \$383,000 of flagged SumTotal transactions are
6		included in the Employee Expense Adjustment.
7		
8	Q.	Are expenses for international travel included in the EER
9		SCHEDULES?
10	Α.	Yes, depending on the business purpose. Our Employee Expense Policy
11		recognizes that international travel is sometimes necessary for conducting
12		Company business, for example, to attend industry trainings and vendor
13		supplier meetings; to audit manufacturing processes at vendors' locations;
14		and, to ensure safe operation of our nuclear facilities. These types of
15		legitimate and necessary expenses are included in the EER Schedules and
16		excluded from the Employee Expense Adjustment.
17		
18	Q.	WHAT IS THE TOTAL AMOUNT OF ADJUSTMENT THE COMPANY MADE TO
19		SUMTOTAL TRANSACTIONS?
20	Α.	Based on the review process described above, we made a total adjustment of
21		approximately \$1.465 million to SumTotal employee expense transactions. A
22		summary table of these adjustments is included in Exhibit(GJO-1),
23		Schedule 8, p. 11.
24		

1	Q.	HOW DID THE COMPANY REVIEW EMPLOYEE EXPENSES RECORDED IN OTHER
2		SYSTEMS THAN SUMTOTAL?
3	Α.	As explained in Section III.B above, VIM, Corporate Passport, VIM Nuclear,
4		and TIME applications include some 2018 employee expense transactions. In
5		these applications, the descriptive fields available are less extensive than those
6		provided within SumTotal. We identified employee expenses by looking at
7		accounting codes, vendor name, description, and other available transactional
8		data fields. For the identified employee expense transactions, we conducted a
9		line-by-line review to remove transactions that we believe are non-
10		recoverable, similar to the SumTotal review described above. The process to
11		review VIM, Corporate Passport, VIM Nuclear, and TIME expense data is
12		described in more detail in Exhibit(GJO-1), Schedule 8.
13		
14	Q.	WHAT ADJUSTMENTS DID THE COMPANY MAKE TO VIM, CORPORATE
15		PASSPORT, VIM NUCLEAR, AND TIME TRANSACTIONS?
16	Α.	Based on our review, we made a total adjustment of approximately \$21,000 to
17		VIM and Corporate Passport employee expense transactions. We did not
18		make any adjustments to VIM Nuclear or TIME data.
19		
20	Q.	Do you think the resulting \$1.5 million Employee Expense
21		ADJUSTMENT FOR THE MINNESOTA ELECTRIC JURISDICTION IS REASONABLE?
22	Α.	Yes. Our process to identify employee expense transactions for exclusion was
23		rigorous and consistent with the commitments we have made in past rate
24		cases. While our employees have continued to make progress in complying
25		with our Employee Expense Policy, this adjustment ensures a reasonable and
26		appropriate amount of employee expenses are included in 2020, 2021, and
27		2022.

1	Q.	ARE TRANSACTIONS THAT MAKE UP THE \$1.5 MILLION EMPLOYEE EXPENSE
2		ADJUSTMENT INCLUDED IN THE EER SCHEDULES?
3	Α.	No. The EER Schedules do not include any of the transactions that make up
4		the \$1.5 million Employee Expense Adjustment. Once the expenses
5		comprising the Employee Expense Adjustment were removed, the remaining
6		data - O&M employee expense transactions - was sorted to create the EER
7		Schedules corresponding to the categories set forth in the Employee Expense
8		Statute.
9		
10		B. Details Regarding EER Schedules
11	Q.	PLEASE DESCRIBE THE INFORMATION REPORTED FOR THE TOP TEN HIGHEST
12		PAID EMPLOYEES AND OFFICERS AS REQUIRED BY THE EMPLOYEE EXPENSE
13		STATUTE?
14	Α.	EER Schedules 5A-5J comply with the Employee Expense Statute
15		requirement that we provide itemized employee expense information for the
16		ten highest paid officers and employees for 2018, the most recently completed
17		fiscal year.
18		
19		The Employee Expense Statute also requires that we provide compensation
20		information for the individuals on the top ten compensated list. EER
21		Schedule 5 includes the State of Minnesota electric 2018 actual and 2020-2022
22		budgeted compensation information for the top ten highest paid officers and
23		individuals. Company witness Ms. Ruth K. Lowenthal describes in her Direct
24		Testimony how we propose to recover costs for employee compensation,
25		including any changes to recover Annual Incentive Plan (AIP) and Long-
26		Term Incentive (LTI) costs.

1	Q.	Is the Company requesting recovery of corporate aviation
2		EXPENSES?
3	Α.	No. EER Schedule 8 provides expenses related to corporate aviation, as
4		required by the statute, but we are not requesting recovery for them and they
5		are excluded from the 2020 test year amount. I note that EER Schedule 8 also
6		includes any food, beverage, lodging, and other travel transactions for the
7		corporate aircraft pilots. These aviation expenses are excluded from the test
8		year amount as well.
9		
10	Q.	Is the Company requesting recovery for any lobbying-related
11		EXPENSES?
12	Α.	No, we do not request recovery of any lobbying or lobbying-related expenses
13		and these are excluded from the 2020 test year amount. Consistent with the
14		reporting in our past electric rate cases, transaction data is not included in
15		EER Schedule 9.
16		
17	Q.	What has the Company done to ensure that there are no lobbying
18		OR LOBBYING-RELATED EXPENSES IN THE EER SCHEDULES?
19	Α.	Lobbying-related costs charged to appropriate internal order accounts are
20		recorded as below-the-line expenses and excluded from the EER Schedules.
21		Our key word search also included lobbying-related words (e.g., lobby, legis,
22		political, election, PAC, senat, and repr) to identify any other transactions that
23		might be related to lobbying and capture them in the Employee Expense
24		Adjustment. Additionally, for those employees who lobby from time to time,
25		we reviewed each of their transactions and removed those that appeared to be
26		for lobbying or lobbying-related activities on behalf of the Company.

Q. Are any other categories of employee expenses excluded from the
 EER Schedules?

A. Yes. Spending for life events – such as funerals, weddings, and birthdays – is excluded from the EER Schedules. All expenses charged in 2018 to the Life Event account were included in the Employee Expense Adjustment. In addition, our key word search review of 2018 transactions included life event-related words (e.g., floral, flowers, funeral, bereavement, birthday, wedding, and baby) to identify other transactions that were not recorded to the Life Event account so that these transactions could be included in the Employee Expense Adjustment. Similarly, expenses that were determined to be for career event celebrations – such as meals for retirement, promotion, or anniversary parties – are included in the Employee Expense Adjustment.

Other expense categories that we are not requesting recovery for are alcohol and entertainment expenses. Any alcohol portion of a meal expense must be itemized separately in SumTotal. The key word search also had terms to identify any other expenses that might be alcohol-related. These were all excluded from the EER Schedules. EER Schedule 3 lists all recreation and entertainment expenses, as required by the Employee Expense Statute. These expenses are recorded below-the-line and we are not requesting recovery for them. EER Schedule 7 lists all gift expenses, and some of these are typically recovered from rates (e.g., performance-based and safety recognition) and some are included in the Employee Expense Adjustment (e.g., wedding or birth gift). Finally, mobile device expenses are not subject to the reporting requirements in the Employee Expense Statute and therefore they are excluded from the EER Schedules.

1	Q.	Are certain employee recognition expenses included in the EER
2		SCHEDULES?
3	Α.	Yes. We use a vendor-based recognition program branded as Xcelebrate to
4		administer recognition awards, and these expenses are included in the EER
5		Schedules. The Xcelebrate program is used to recognize excellent work
6		performance and accomplishments. Awards must be approved by leadership,
7		and approval levels vary depending on the award value from manager through
8		Vice President. Xcelebrate awards are received in points, which can be used
9		for merchandise or gift cards through an online catalog. The highest level of
10		award is equivalent to \$200, and this level requires both manager and
11		Director/Vice President approval. A nomination wizard within Xcelebrate is
12		available to help determine the appropriate award level. Xcelebrate awards
13		may also be used to recognize excellent work performance that is related to
14		safety.
15		
16		In addition, the Xcelebrate program is used to recognize years of contribution
17		at five-year intervals as well as retirement. Eligible employees are invited to
18		select a gift from the applicable anniversary/retirement catalog. Transactions
19		administered through the Xcelebrate platform were included in our employee
20		expense review. We continue to believe that employee recognition and
21		appreciation help foster a collegial working environment essential to achieving
22		a high level of productivity.
23		
24	Q.	Are safety-related recognition expenses included in the EER
25		SCHEDULES?
26	Α.	Yes. Safety-related gifts and other incentives are included in the EER
27		Schedules, consistent with past practice. Safety-related accomplishments may

also be recognized outside the Xcelebrate program. For example, Nuclear Operations and other business areas may recognize a group or plant for a specific achievement, such as successful and safe completion of a large project or reaching a major milestone without an injury. All safety-related recognition awards, incentives, meals, and gifts must be approved by a manager and/or a safety committee. Safety recognition expenses were included in our employee expense review. Safety recognition is a necessary and reasonable expense to provide utility service – one of the Company's fundamental goal is to ensure and enhance the safety of our employees and customers.

- Q. EER SCHEDULE 6 LISTS ASSOCIATION DUES ARE THESE INCLUDED IN THE
   EMPLOYEE EXPENSE AMOUNT?
  - A. EER Schedule 6 lists three types of dues: Professional Association Dues, Chamber of Commerce Dues, and Social Services Dues. Professional Association Dues are incurred by our individual employees for memberships in professional organizations in their respective fields. The portion of Professional Association dues that is not considered lobbying is recoverable and included in the test year Employee Expense Amount. Chamber of Commerce Dues are corporate expenses and they are excluded from the Employee Expense Amount. We request recovery for the non-lobbying portion of these dues, which is supported in Mr. Halama's testimony. Social Services Dues are corporate expenses, recorded below-the-line, and excluded from the 2020 test year.

Q. WHAT EMPLOYEE EXPENSE DATA IS INCLUDED IN EER SCHEDULES 10, 11,

2		AND 12?
3	Α.	These schedules contain summary employee expense data from VIM and
4		Corporate Passport (EER Schedule 10), VIM Nuclear (EER Schedule 11),
5		and TIME (EER Schedule 12). Per our commitment in the 2011 rate case, we
6		have provided summary data instead of complete transaction details.
7		
8	Q.	ARE THERE ANY LIMITATIONS IN THE PROCESS USED TO DEVELOP THE EER
9		SCHEDULES OR THE SCHEDULES THEMSELVES?
10	Α.	We believe our EER Schedules comply with the requirements in the
11		Employee Expense Statute. However, I note that the process we use to
12		develop the EER Schedules is almost entirely manual, and requires that our
13		employees analyze and review many thousands of lines of data. SumTotal
14		does not have the functionality to automatically generate reports that comply
15		with the Employee Expense Statute requirements. Therefore, the
16		development of EER Schedules continues to be a manual effort that requires
17		judgment.
18		
19	Q.	Can you reconcile the EER Schedules to the test year 2020
20		REVENUE REQUIREMENT FOR EMPLOYEE EXPENSES?
21	Α.	No. The EER Schedules are based on the actual 2018 employee expense
22		transactions. The test year revenue requirement of approximately \$13.9
23		million is based on the 2020 budgeted expenses by business areas. As a result,
24		a direct reconciliation of the 2018 EER Schedules to the 2020 test year
25		amount is not possible because of the different time periods.
26		

1	Q.	CAN YOU SUM UP THE 2018 EER SCHEDULES SO THAT THEY MATCH THE
2		ACTUAL 2018 EMPLOYEE EXPENSES IN THE COMPANY'S GENERAL LEDGER?
3	Α.	No, for several reasons. For example, the transactions that make up the
4		Employee Expense Adjustment of \$1.5 million are included in the general
5		ledger but excluded from the EER Schedules. Also, several EER Schedules
6		have duplicative employee expenses. For instance, transactions in EER
7		Schedule 1A (Vice President and Above Travel and Meal) are also included in
8		EER Schedule 1 (Travel and Lodging) and EER Schedule 2 (Food and
9		Beverage). Similarly, employee expense transactions in EER Schedules 5A-5J
10		(Top Ten Compensated) are also included in the other EER Schedules.
11		
12		VI. FLEET CAPITAL INVESTMENTS
13		
14	Q.	WHAT IS THE PURPOSE OF THIS SECTION IN YOUR TESTIMONY?
15	Α.	I support the Company's capital budget for the Supply Chain business area's
16		Fleet organization. The Fleet organization is responsible for planning,
17		procuring, maintaining, and retiring the Company's fleet assets.
18		
19	Q.	PLEASE DESCRIBE THE CENTRALIZATION OF FLEET CAPITAL TO SUPPLY
20		CHAIN'S FLEET ORGANIZATION.
21	Α.	Management of the capital fleet budget (Fleet Capital) was mostly centralized
22		within Supply Chain's Fleet organization in November 2018. Prior to this
23		centralization, each operational business area was responsible for budgeting
24		fleet capital investments. The Fleet organization is now responsible for
25		managing the capital fleet budget for all business areas across Xcel Energy's
26		operational companies, including replacement, maintenance, and repairs for
27		existing fleet vehicles and equipment. However, each business area continues

1		to be responsible for budgeting new capital fleet assets when that business
2		area decides to expand its existing fleet.
3		
4	Q.	WHAT ARE THE BENEFITS OF CENTRALIZING FLEET CAPITAL?
5	Α.	Centralizing Fleet Capital management responsibilities to one unit within
6		Supply Chain creates efficiencies, harmonizes long-term planning, and
7		optimizes the purchase and maintenance of the Company's fleet. The Fleet
8		organization works closely with operational business areas to ensure a
9		strategic approach that provides the right mix of safe and reliable Company
10		vehicles and equipment.
11		
12		As a result of Fleet Capital centralization, we have also been able to improve
13		the process to identify aged fleet vehicles and equipment that need
14		replacement. The Fleet organization uses a condition-based assessment
15		strategy to identify those fleet assets that are in most need of replacement -
16		the worst fleet assets based on age, miles, and hours are replaced first. This
17		means that in any year, the most need may be concentrated to a single
18		business area or operational company, and as a result, capital budgets for fleet
19		replacements may fluctuate from year-to-year.
20		
21	Q.	DO THE CHANGES DISCUSSED ABOVE – CENTRALIZATION OF FLEET CAPITAL
22		AND CONDITION-BASED ASSESSMENT — HAVE OTHER IMPACTS?
23	Α.	Yes. Because of the organizational change, it is difficult to analyze cost trends
24		and compare the 2019 forecast and 2020-2022 budgets to past year actual
25		expenses, which were tracked by individual business areas. However, going
26		forward, centralization of Fleet Capital will make it easier to project future
27		costs and to compare them to past actuals because we are using consistent

1		reporting categories and practices. Additionally, the process change to use
2		condition-based assessment means that for one jurisdiction or business area,
3		the budget for fleet replacements may vary from one year to another. We
4		believe this is an improvement on prior practices because we will be making
5		more targeted decisions regarding repairs and replacements for our fleet
6		assets.
7		
8	Q.	PLEASE DESCRIBE THE COMPANY'S FLEET FUNCTIONS WITHIN THE NSPM
9		JURISDICTION.
10	Α.	The Company maintains a fleet of approximately 2,800 vehicles and
11		equipment to support our Distribution, Transmission, Energy Supply, Gas,
12		and Nuclear business areas in the NSPM jurisdiction. These fleet assets
13		include various types of cars, trucks, trailers, and construction equipment. We
14		also maintain 17 garages in the NSPM jurisdiction, where we inspect and
15		repair fleet vehicles and equipment. Additionally, we own and operate 12
16		fueling depots in the NSPM jurisdiction. We operate our own fueling depots
17		to enhance crew efficiencies, to ensure access to diesel fuel for emergency
18		operations, and to accommodate vehicles that cannot use commercial retail
19		fueling stations due to size or other restrictions. The Company could not
20		accomplish our core service - providing electricity to customers - without
21		reliable, high quality utility trucks and other equipment.
22		
23	Q.	How does the Fleet organization categorize capital investments
0.4		

- 23 24 FOR FLEET?
- A. We categorize fleet capital investments into the following groups: 25
- 26 • Fleet Asset Replacements: investments to replace aging and retiring 27 vehicles, trailers, and construction equipment.

- Fleet Repairs: investments to repair existing fleet assets to extend their useful life.
  - *Garage Tools:* investments for tools needed to inspect and repair fleet assets, such as lifts, jacks, oil distribution systems, exhaust systems, and other similar mechanical tools.
  - Fueling Depots: investments for replacing infrastructure at Companyowned fueling stations.

Α.

- Q. What are the Budgeted Capital Costs for the Fleet organization for 2020-2022 (Minnesota Electric Jurisdiction)?
  - Table 3 below shows the actual fleet capital costs by business area for years 2016-2018; forecasted capital costs for 2019; and budgeted capital costs for years 2020-2022. The budgeted capital additions for the Fleet organization total \$16.5 million in 2020, \$19.4 million in 2021, and \$24.7 million in 2022 for the Minnesota electric jurisdiction. The majority of the 2020-2022 fleet capital budget (approximately 80 percent) is associated with the Distribution business area, which is responsible for interconnecting all distributed energy resources (DER) to our system as well as building, maintaining, and repairing our distribution facilities, including service lines to customer premises. These responsibilities require constant travel across the NSPM service area with a variety of trucks and equipment. Also, our ability to swiftly and safely respond to storm and other emergencies hinges on our crews having reliable fleet vehicles and equipment.

1	Table 3
2	Actual and Budgeted Fleet Capital Additions by Business Area (2016-2022),
3	Minnesota Electric Jurisdiction

(im \$ 0002a)	2016	2017	2018	2019	2020	2021	2022
(in \$ 000's)	Actual	Actual	Actual	Forecast	Budget	Budget	Budget
Distribution	3,126	15,537	12,342	6,322	12,819	14,912	20,086
Transmission	5,802	4,825	5,435	3,494	3,400	3,300	3,400
Energy Supply / Nuclear <sup>3</sup>	16	813	384	0	300	1,200	1,200
Total	8,944	21,176	18,161	9,816	16,519	19,412	24,686

Q. Please provide an overview of the major planned capital additions
 for the Fleet organization for 2020-2022.

A. As Table 4 below displays, Fleet Asset Replacements are by far the largest category of capital additions, comprising over 90 percent of the annual budget for 2020-2022 for the Minnesota electric jurisdiction. We are making multi-year capital investments to replace aged fleet assets to decrease maintenance costs and to improve performance. Fueling Depots are our second largest category of capital additions, followed by Fleet Repairs and Garage Tools. Also Exhibit\_\_\_(GJO-1), Schedule 9 provides Fleet capital additions by account for the Minnesota electric jurisdiction.

<sup>&</sup>lt;sup>3</sup> We discovered that the capital additions budgeted for Energy Supply and Nuclear for 2020-2022 did not have closing patterns when it was too late to incorporate these capital additions in the Company's calculation of the Minnesota cost of service. We will include these additions in an adjustment made in Rebuttal Testimony.

Table 4

Actual and Budgeted Fleet Capital Additions by Cost Category (2016-2022),

Minnesota Electric Jurisdiction

	I	ı	ı			ı	
( + 0000 )	2016	2017	2018	2019	2020	2021	2022
(in \$ 000's)	Actual	Actual	Actual	Forecast	Budget	Budget	Budget
Fleet Asset							
Replacements	8,736	20,846	17,567	8,655	15,259	17,912	23,716
Fueling Depots	0	0	0	511	510	750	220
Fleet Repairs	138	240	116	400	400	400	400
Garage Tools	69	89	478	250	350	350	350
Total	8,944	21,176	18,161	9,816	16,519	19,412	24,686

Q. Please describe investments in fleet asset replacements for 2020 2022.

A. We have budgeted \$15.3 million for replacing fleet assets in 2020, \$17.9 million in 2021, and \$23.7 million in 2022 for the Minnesota electric jurisdiction. These budgeted amounts include, for example in 2020, the replacement of 5 passenger cars, 26 light duty trucks, 39 trucks (bucket trucks, digger derricks, crane trucks), 5 medium and heavy duty trucks (chassis trucks with a mounted service body, flatbed, or dump body), 12 trailers, and 25 pieces of power-operated equipment (backhoes, excavators, forklifts, trenchers). Similar capital additions will be made in 2021 and 2022.

As discussed above, the Fleet organization makes decisions on replacing fleet assets across the Company's operational companies based on the age and conditions of the vehicles and equipment. The fleet assets with the worst

conditions – evaluated by age, miles, and hours – are replaced first. This condition-based assessment process means that in one year, the most need for replacing fleet assets may be within one operational company or within one business area. As a result, the annual budget for fleet asset replacements for a Company jurisdiction may fluctuate. For example, during 2019 the Fleet organization made significant efforts to replace aged fleet assets for the gas operations in our Colorado jurisdiction, and less resources were spent for the Minnesota electric jurisdiction.

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10 Q. Please describe investments in New Fueling Station infrastructure 11 for 2020-2022.

> We began to upgrade Company-owned fueling depots in 2018 in the Minnesota jurisdiction and anticipate that this work will be completed in 2022. The underground fuel storage tanks at our fueling depots are 30-50 years old and have reached the end of their useful life both mechanically and environmentally. They will be replaced with above-the-ground storage tanks that minimize environmental risks. We completed four fueling stations in Minnesota by the end of 2018; three additional refueling sites will be finished in 2020, three in 2021, and one in 2022. In addition, we will install new fuel card readers in all fueling depots. For these fueling station investments, we have budgeted \$510,000 for 2020, \$750,000 for 2021, and \$220,000 for 2022. We note that prior to the re-organization of Fleet Capital under Supply Chain, fueling depot infrastructure was not a separate capital cost category, and these costs were included in the garage tools category. The majority of the 2018 actual capital additions for garage tools, in fact, are related to upgrading fueling station infrastructure. Beginning 2019, capital costs related to fueling depot upgrades have been budgeted as a separate category.

- 1 Q. Please describe investments in fleet asset repairs for 2020-2022.
- 2 A. For 2020-2022, we have budgeted \$400,000 per year for fleet asset repairs.
- Repair costs are unpredictable and fluctuate annually, based on the number
- 4 and type of vehicles and equipment that fail in any given year. Actual repair
- 5 costs are higher for larger trucks and more complex work. Because it is
- difficult to predict actual repair costs, we have budgeted a reasonable
- 7 estimate, \$400,000 annually for 2020-2022. As noted above, based on the
- 8 recent organizational change for Fleet Capital, we note that historical actual
- 9 expenses differ from future budgeted additions. We expect, going forward,
- actuals will generally align with budgeted amounts.

11

- 12 Q. Please describe investments in Garage tools for 2020-2022.
- 13 A. We typically budget about \$250,000 annually for maintaining and replacing
- garage lifts, jacks, and other tools. We have budgeted an additional \$100,000
- annually for 2020-2022 to equip our garages with fall restraint equipment to
- meet U.S. Occupational Safety and Health Administration's (OSHA)
- 17 requirements for work conducted more than four feet off the ground (e.g.,
- repairing the bucket of a lift truck). This new fall restraint equipment, which
- includes harnesses, lifts, and related items, is necessary to comply with OSHA
- 20 requirements and to keep our fleet technicians safe. Again, we note that due
- 21 to the organizational change for Fleet Capital, historical actual expenses differ
- from future budgeted additions, but going forward, actuals should align with
- budgeted amounts.

#### 1 VI. COMPLIANCE ITEM ON LOBBYING COMPENSATION

2

3 Q. DO YOU PROVIDE COMPENSATION INFORMATION FOR EMPLOYEES ENGAGED 4 IN LOBBYING?

5 Yes. In Docket No. E002/GR-10-971, the Company agreed to include in its 6

next rate case a report of the total compensation for employees engaged in lobbying, with an explanation of the costs included and excluded in the rate request. This information is provided in Exhibit\_\_\_(GJO-1), Schedule 10.4

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## VII. CONCLUSION

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12 Q. PLEASE SUMMARIZE YOUR TESTIMONY.

throughout the term of the MYRP.

Our EER Schedules contain the employee expense information required by the Employee Expense Statute. We have conducted a rigorous review to ensure that employee expense costs included in the test year are consistent with the Employee Expense Statute, the commitments in our prior rate cases, and the guidelines in our Employee Expense Policy. Our rate case adjustments of \$1.5 million for employee expenses and \$2.1 million for

corporate aviation ensure that reasonable and appropriate costs are included

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<sup>&</sup>lt;sup>4</sup> We discovered that the lobbying labor costs budgeted for State Public Affairs do not align with State Public Affairs' actual forecasted labor costs for purposes of the Company's calculation of the Minnesota cost of service. We have made a change in Interim Rates, and will make an appropriate adjustment in Rebuttal Testimony.

- 1 We have budgeted \$16.5 million in 2020, \$19.4 million in 2021, and \$24.7
- 2 million in 2022 for Fleet capital additions to maintain reliable, high quality
- 3 utility trucks and other equipment.

- 5 Q. Does this conclude your Direct Testimony?
- 6 A. Yes, it does.

# Statement of Qualifications Gary J. O'Hara

# Education:

University of Minnesota

# **Employment:**

Xcel Energy	
2013-Present	Vice President, Supply Chain
2007-2013	General Manager, Supply Chain
2006-2007	General Manager, Operations, Strategy and Development
2003-2006	General Manager, Design, Construction and Maintenance
2000-2003	Director, Contracting and Competitive Resources
1998-2000	Manager, Gas Operational Planning and Development
1997-1998	Manager, Gas Business Development
1995-1997	Manager, Natural Gas Services
1993-1995	Manager, Contractor and Operational Support
1992-1993	Superintendent, Gas Construction
1987-1992	Supervisor, Gas Construction
1987-1987	Coordinator, Gas Maintenance
1984-1987	Quality Assurance Specialist, Gas Engineering
1979-1984	Project Designer, Gas Engineering
1972-1979	Gas Fitter, Gas Construction



# Travel and Employee Expense Reimbursement (Corporate Policy 10.2)

### **Purpose**

Xcel Energy reimburses employees for reasonable travel and business-related expenses, upon leader approval, that the company normally considers to be deductible under the Internal Revenue Code and regulations for deductible business expenses. Employees are expected to use sound business judgment and plan travel and other business-related expenses to minimize costs.

This policy sets forth expectations regarding reimbursement for approved business related expenses.

## **Applicability**

This policy applies to all employees of Xcel Energy Inc.'s subsidiaries and affiliates ("Xcel Energy").

## **Out of Scope**

Consultant travel and business-related expenses should be managed in accordance with a negotiated contract and the Supply Chain guidelines document <a href="Contract Guidelines for Expenses">Contract Guidelines for Expenses</a>. Business related expenses will be reimbursed through Professional Service Agreements established with consultant or consulting firm.

Staff Augmentation Contractor travel and business-related expenses should be invoiced by contracting agency under the terms of its Master Staff Augmentation Services Agreement with Xcel Energy. The Agency is responsible to reimburse the Agency's workers expenses.

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## **Requirements and Responsibilities**

## **Corporate Credit Card**

Employees who incur travel and/or other business expenses for Xcel Energy will be issued, and are required to use, a company-sponsored Corporate Credit Card in accordance with this policy and submit for reimbursement through the Expense Management System. Staff Augmentation Contractors and interns are not allowed to have Corporate Credit Cards; they may seek reimbursement for expenses through contract agency or invoice based on Professional Service Agreement.

Leaders are responsible for assigning transaction limits for employees during the application process. The standard transaction limits of:

- \$1,500 per purchase transaction,
- \$2,500 per travel expense transaction and
- \$5,000 monthly limit

apply unless other limits are requested and approved.

Splitting transactions that are greater than the assigned limits is not allowed. If an employee is required to make a purchase that is greater than the assigned limits, he or she must fill out either a <a href="Mone-Time Authorization Limit Change or a">One-Time Authorization Limit Change or a</a><a href="Permanent Limit Change">Permanent Limit Change</a> request. His or her Leader must forward the approved form via e-mail to <a href="mailto:cardadminsupport@xcelenergy.com">cardadminsupport@xcelenergy.com</a> to execute the request.

Corporate Credit Cards are assigned to individual employees and should be used only by the employee whose name is on the credit card. Any exceptions must be documented as to why someone else signed receipts, etc.

## **Expense Statement Filing Requirements**

Each employee is to include only his or her expenses on an expense reimbursement statement. Leaders may include on their expense statements minor expenses for their employees who do not ordinarily use an expense statement. Employees should submit only one expense report per month within 30 days of the first expense transaction. Employees can choose a day of the month and submit their expenses in the Expense Management System each and every month on that date to maintain the 30 day submission window. Expenses for special meetings, conferences, conventions, seminars, industry meetings, training classes and travel are reimbursable and may be combined with routine expenses on one expense report. Employees may include on their expense statement, expenses for meetings, conferences, meals, etc. where the Leader(s) is in attendance with other staff and charged to a subordinate's Corporate Credit Card.

The company allows the use of proxies in the expense report process. The term "Proxy" applies to an employee who acts (i.e., creates and submits and/or approves expense reports) on behalf of another employee. Proxies may only approve reports if they have been assigned the approver role in the Expense Management System. Only supervisor level and above have the approver role in the Expense Management System. Employees/Proxies and Approvers will be held equally accountable for the accuracy of report information.

Expense reimbursement statements must be submitted within 30 days of the incurred expense. Employees will be notified if expenses are not submitted within 30 days of the incurred expense. Daily notifications will be sent for expenses that are not submitted within 45 days of the incurred expense.

Expense statements not submitted within 60 days will cause the employee's Corporate Credit Card to be suspended until the report is approval complete. Per IRS regulations any employee expenses not claimed within 60 days of when the expense was incurred may be deemed taxable income to the employee.

Expense statements 90 days delinquent will cause the employee's Corporate Credit Card to be closed. Approval from the <u>Director, Supply Chain Process</u> <u>Control</u> will be required to obtain a new credit card.

For Internal Revenue Service (IRS) reporting, proper documentation for expenses is required, including a complete business purpose. Business purposes must adequately describe why the expense was incurred, not what the expense was. For example, an appropriate business purpose for an overtime meal expense while working on a boiler repair would be: "Overtime Meal – Boiler Repair." Oneword descriptions such as "dinner" or "tickets" are not considered adequate. Abbreviations may be used in the business purpose as long as the abbreviation is spelled out on the receipt or in the description field.

Employees must ensure that expenses are allocated to the correct accounting and expense type. Employees should contact their <u>accounting representative</u> for further information.

## **Records and Receipts**

The company requires records and detailed itemized receipts to qualify the employee as having "accounted to his or her employer" for reimbursement of expenses, as defined by the Internal Revenue Code.

The following instances always require a detailed itemized receipt:

- All Cash out-of-pocket expenses require an itemized receipt regardless of amount; exceptions include reasonable tips and tolls. For documenting expenses when a receipt is not available, see <u>Lost Receipts</u>.
- All lodging expenses require an itemized detailed receipt to ensure appropriate accounting for sales and use tax.
- All purchase-type expenses (e.g., materials, subscriptions, tangible goods or anything other than typical travel expenses, etc.) regardless of amount to ensure appropriate accounting for sales and use tax.
- The itinerary showing the amount charged is the required detailed itemized receipt for airline travel and service fees if applicable.
- Costs associated with alcohol purchases are required to be broken into separate expense types.
- Documentation (itemized receipt) for a business meal must include the specific business purpose, first/last name and title of those in attendance, including affiliation/company of non-employees and business relationship, i.e., "employee" or "guest". If meals are for a large group, describe the group in attendance and provide the names/relationship of attendees; consider attaching a sign-in sheet as supporting documentation.
- Meals at or above \$25 require a detailed itemized receipt.
- All Travel type expenses at or above \$25 require a detailed itemized receipt.
- Multi-trip mileage requires use of a <u>Mileage Authorization</u> form Single mileage trip detail (i.e., one-way or round trip) may be entered in the system. Employees must disclose the point of departure, the destination and the total miles for the trip.

Itemized machine-produced detailed itemized receipts are required and must be submitted along with the credit card receipt to support documentation. If the employee's credit card number is displayed on the receipt, black out all but the last four digits to protect sensitive information.

## **Lost Receipts**

If a receipt is lost or not available, the employee must complete the Lost Receipt form, signed by the employee verifying the legitimate travel and/or business expense. This documentation then serves in place of a detailed itemized receipt. If appropriate, employees should add information in the Description section of the

Expense Management System explaining relevant details for expenses incurred that are not self-evident.

## **Expense Approval**

Leaders are required to ensure this policy is followed and use discretion based on business need and approved budget when approving expenses. Leaders and/or Delegates who approve reimbursement for travel and business expenses are ultimately responsible for the overall accuracy and completeness of the expenditures being claimed and must ensure:

- All transactions are adequately documented.
- All transactions are appropriate and all company policies and procedures have been complied with.
- Any exceptions are warranted and properly documented.
- Correct type of cost and expense type have been assigned.
- Necessary detailed itemized receipts have been included.
- Other necessary documentation has been provided.

## **Allowance for Personal Protective Equipment**

For bargaining employees, reimbursement should comply with the collective bargaining agreement. For non-bargaining employees, reimbursement should comply with the <u>Personal Protective and Safety Equipment policy</u>, 12.1.170. Non-bargaining employees must document the frequency of Personal Protective Equipment purchases, in the Expense Management System Description section, if the amount is higher than the per-year allowance.

## **Business Travel Expense**

Before booking any travel arrangements, employees must determine the business need for the trip and consider less costly alternatives, such as teleconferencing or other conferencing options.

Employees should use contracted travel providers when available. Contracted travel providers are available for airlines, hotels and rental car companies and can be accessed through the <u>Travel Management Company</u>. All travel arrangements and reservations should be made through the travel management company to ensure use of negotiated financial benefits. The online booking tool should be used to make travel arrangements and reservations versus using the telephone. This allows employees to take advantage of the reduced costs associated with online travel arrangements.

For employees who travel more frequently, a travel profile should be created to ensure pertinent preferences and frequent travel memberships are used during the reservation process. Employees must notify the contracted <a href="Travel">Travel</a>

Management Company of any profile changes or updates.

## **Frequent Flyer Miles and Points**

Frequent flyer miles and points for hotel stays (or other reward programs) accrued when traveling on company business may be used for upgrades, business or personal travel. Choosing a particular supplier to maximize personal frequent flyer miles or booking through hotel or other Internet Web sites to maximize hotel points; however, is not permitted. Xcel Energy does not reimburse expenses related to frequent traveler programs.

## **Early Arrival or Extended Stay**

Provided the additional stay results in an overall savings to the company, employees may arrive early or extend their stay at a business destination for up to two days for reimbursement purposes. Spousal travel expenses are not reimbursed as part of this program. Savings can frequently be realized by reserving an airline ticket with a Saturday night stay. A travel itinerary provided by the <a href="Travel Management Company">Travel Management Company</a>, substantiating the cost savings, may be required prior to reservation by the approving Leader, Corporate Card Team or Audit Services. Other expenses incurred during the extended stay of a personal nature, such as sightseeing or recreational expenses, will not be reimbursed.

The frequency of return flights for employees traveling on company business for extended time is at management's discretion.

#### Personal Use/Cash out of Pocket

Personal use of the Corporate Credit Card is limited to "incidental use" only. Incidental use is when the personal portion of an expense is less than 50 percent of the combined business and personal expense amount. If the personal expense is greater than the 50 percent of the combined business and personal expense amount, the employee should claim the business expense as "cash out of pocket" on an expense statement. Personal expenses (e.g., movies, toiletry articles, etc.) are not reimbursable.

It is only appropriate to claim 100 percent cash out of pocked for nominal expenses incurred while traveling when credit cards are not accepted or if an employee accidentally uses a personal credit card for business travel or business-related expenses. The employee should claim the business expense as "cash out of pocket" on the expense statement and the approving Leader can approve the expense along with the proper detailed itemized receipt documentation.

Cash out of pocket expenses are monitored to ensure the Corporate Credit Card is used appropriately. Continued use of a personal credit card for travel or business expenses, however, requires the director, Supply Chain Process Control

approval as this is a violation of company policy and should not be happening repeatedly.

### **Meals and Entertainment**

Meal expense reimbursement includes food, non-alcoholic beverages, alcoholic beverages; and associated taxes and tips. The correct expense type must be used for:

- Travel Meals
- Business Meals
- Entertainment Meals
- Recognition Meals

The recommended per-meal guidance is: breakfast \$8-10, lunch \$10-15 and dinner \$20-40. The maximum reimbursement is \$65 per person, per day, including food, non-alcoholic beverages, alcoholic beverages and associated taxes and tips. If an employee exceeds the \$65 per person, per day maximum he or she must submit written approval from their vice president with the receipt(s).

An employee may include on his or her expense statement expenses for larger team meetings, where Leader(s) are in attendance with other staff, and expenses are charged to a subordinate's Corporate Credit Card. Otherwise, when two or more employees are in attendance for a meal meeting for company business, the highest-ranking employee must submit the costs for reimbursement.

Meals related to approved professional organizations, industry or trade associations are reimbursable.

Every effort should be made to use contracted corporate agreements for food and beverages purchased for onsite business meetings.

Employees should consider the appropriateness and the company's liability when serving and/or consuming alcohol. Employees must comply with the company's fitness of duty provisions outlined in corporate policy <u>9.3</u>, <u>Alcohol and Drug-free Workplace</u>.

## **Expenses Ineligible for Reimbursement**

The company will not reimburse expenses that are:

- Socially or personally motivated
- For reciprocal meals or entertainment

### **Travel Meals**

Travel Meals are generally for each individual while traveling on company business. Documentation must include the specific business purpose for the travel and detailed receipts showing all items purchased (itemized receipts).

#### **Business Meals**

Business Meals with employees and non-employees and which principally benefit the company, may be reimbursed if the business cannot be reasonably conducted during regular business hours. Business Meals are generally not associated with travel; however if this meal occurs while traveling, it must be coded as a Business Meal.

Business Meals with only employees present will be reimbursed when the meeting has a valid business purpose and could not have been reasonably conducted during regular business hours. Meals to discuss casual business matters will not be reimbursed.

### **Entertainment Events and Meals**

Entertainment Events and Meals include tickets for sporting events, other ticketed entertainment, recreational events (e.g., golfing, fishing, resort activities, etc.) and associated expenses. Any expenses associated with entertaining employees and/or non-employees are reimbursable only when the principal purpose of the activity benefits the company, such as Company sponsored program events for employees and/or non-employees.

Entertainment that includes employees only should be accounted for as recognition – see Employee Recognition.

## **Recognition Meals**

Refer to the Employee Recognition section.

## **Business Meetings/Events**

Whenever possible, business meetings should be held on company property and limited to business requirements.

Every effort should be made to use existing contracted corporate agreements or contracted hotels for off-site business meetings and events. The <u>Travel</u> <u>Management Company</u> agent will support the identification of contracted meeting spaces.

## Lodging

Every effort should be made to use the company's online booking tool when making lodging arrangements. Using any other source may cause the company to lose valuable management information as well as negotiated financial benefits. Xcel Energy has negotiated with its <a href="Travel Management Company">Travel Management Company</a> certain discounted hotel rates at contracted properties. These hotels should be used whenever possible for overnight accommodations on business trips when the contracted property is close to the employee's final destination. Where negotiated discount rates are not available, the <a href="Travel Management Company">Travel Management Company</a> will recommend good quality, moderately-priced hotels. Service fees for booking hotel reservations are reimbursable.

If your stay is booked with a non-contracted property, you should ask for the lowest available rate at check in because a lower rate may be obtained than was originally quoted. Often hotels will reduce rates based on low occupancy.

Employees may be able to secure lower rates by supplying individual travel club information. Employees should include this information on their travel profile to ensure that the <u>Travel Management Company</u> can access those rates at the time of booking.

Room reservation cancellations must be made according to instructions on trip itineraries to avoid a "no-show" charge. Employees should contact the <u>Travel Management Company</u> to make cancellations. Employees who must cancel a reservation on their own should note the cancellation number and hotel contact person. Xcel Energy will not reimburse "no-show" charges.

Employees who are attending an off-site meeting and reside in the same local area should commute to and from the meeting rather than stay in a local hotel, unless the length of the meeting or commute time represents an undue burden. If an employee feels this is an undue burden, he or she should discuss this with his or her Leader who may approve other arrangements.

For conferences and hotel arrangements, take advantage of the least total cost approach.

## **Ground Transportation**

Employees may select ground transportation, using their personal vehicle over air travel provided the expenses are less than the lowest available round trip air fare that would have been scheduled for the employee, by the company travel agency.

When evaluating costs, you must include expenses associated with the trip
to and from the airport and any costs associated with vehicle rental or
ground transportation at the business destination.

purposes.

 When using a personal vehicle, the standard approved mileage rate for the most direct route to and from the business destination, plus meals and lodging expenses for the travel time, should be included for comparison

Approval for selecting ground transportation over air travel must be obtained in advance from your Business Area Executive Leader. All expenses must be supported with appropriate detailed itemized receipts and documentation, and reimbursement will be for the employee share only.

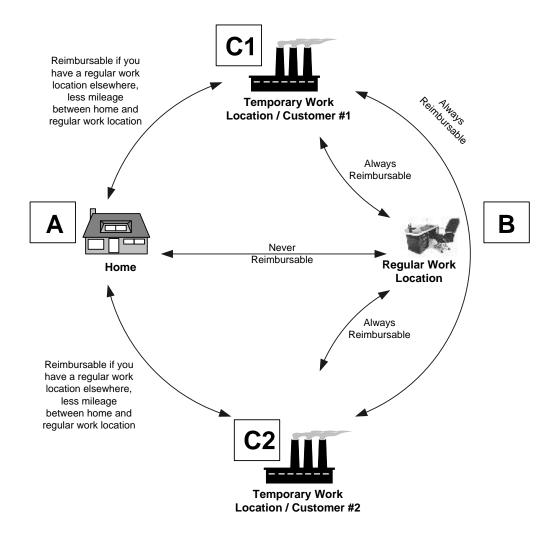
Documentation of the lowest available round-trip air fare provided by the company travel agency must be included with the request for reimbursement.

## Mileage

Personal vehicles driven for Xcel Energy business purposes must be of reasonable value, in good repair and in safe operating condition. Motorcycles shall not be used.

Ground transportation expenses are reimbursable when employees use their own vehicle for required company business and the mileage exceeds the mileage between the employee's home and regular work location(s). For documentation purposes, employees must disclose the point of departure, the destination and the total miles for the trip. Employees should be aware that if mileage is paid, but is not reimbursable under IRS guidelines, that reimbursement to the employee is taxable income per IRS regulations.

The following illustration depicts the rules used to determine if ground transportation expenses are reimbursable.



## Expense reimbursement scenarios:

- Between home (A) and regular work location (B), whether by car or bus, is never reimbursable.
- Between home (A) and temporary work location/customer (C1 or C2), if you have a regular work location elsewhere, is reimbursable less mileage between home and regular work location. If the normal one-way commute (A to B) is 10 miles and the mileage to the temporary work location (A to C1) is 15 miles, then 5 miles are reimbursable.
- Between regular work location (B) and temporary work location/customer (C1 or C2) is always reimbursable.
- Between two or more temporary work locations/customers (C1 and C2) is always reimbursable.

## **Definitions:**

Home	The place where you reside. Transportation expenses between your home and your main or regular work location(s) are personal commuting expenses.
Regular work location(s)	Your principal place(s) of business.
Temporary work location	This is not your regular work location, but another company or off-site location to which you travel to perform work-related activities or to attend meetings or events. Travel to this location is for a year or less.

All of the above rules apply on weekends; therefore, mileage incurred from home (A) to regular work location (B) is NOT reimbursable on the weekend.

#### Vehicle Rental

Employees should rent vehicles only when other transportation is more costly or impractical. Mass transit is available in many cities and may be a less expensive and more efficient mode of transportation than a rental vehicle. Likewise, taxis or hotel shuttles may eliminate the need for rental vehicles if additional ground travel is not expected during the trip. In some cases, a limousine service may be more economical or feasible, depending on the employee's final destination. The employee should make all efforts to be flexible, to select the lowest cost-option that is reasonably convenient and that does not compromise personal safety.

Xcel Energy has contract rates with specific rental car vendors and limousine providers. Those contracted providers should be used to take advantage of negotiated financial benefits. Frequent rental car membership enrollment is available online by accessing the preferred car program on the <a href="Travel - Home">Travel - Home</a> website.

Rental vehicle size should be requested based on business needs. Mid-size cars are standard.

## **Company Vehicles**

Although Fleet vehicles may be checked out for shorter travel, business travel of more than 50 miles per day should be conducted in a company pool car, where available, to minimize costs. Refer to the Fleet Management Group website for

related information. Contact the Fleet Management Group to arrange assignment of a pool vehicle or to add another vehicle to the pool at a specific location.

Refer to corporate policy <u>10.3</u>, <u>Company Vehicle Assignment and Use</u>, for details.

#### Insurance

Employees should not accept additional vehicle insurance for rentals in the United States. Xcel Energy's self-insurance policy and the bank issuing the Corporate Credit Card provide this coverage. When renting a vehicle outside the United States for business, employees should purchase the liability and physical damage insurance coverage.

If the employee rents a vehicle for both business and non-business travel during the same rental period, he or she may wish to purchase the additional insurance coverage for the non-business portion of the trip. Employees will not be reimbursed for this expense.

Employees must have personal insurance on their personal vehicle, carried at the minimum level designated by the state where the vehicle is registered, if the personal vehicle is used for company business.

### **Fuel**

Rental vehicles should be refueled before return to avoid high fuel costs, unless it is a higher cost benefit to refuel at the rental company. If it is known ahead of time that refueling will not be possible and considerable driving is expected, an alternative may be to purchase the gas from the car rental company at time of rental pick-up. Advance purchase of the full tank is generally at local gas station rates.

#### **Accidents**

If an accident occurs while driving a rental vehicle for business, the employee should ensure that a police report is filed after first handling injuries (i.e., calling police, medical assistance, etc.) and taking precautions at the accident scene to minimize harm to others. A copy of the police report and/or the case number is required by the rental car company and should be obtained for Xcel Energy. The employee also should record all pertinent information about the accident, including other drivers' names, addresses, telephone numbers, insurance carriers, make of cars, etc. The employee should report the accident to Xcel Energy Management. Upon return from the business trip, the employee should promptly initiate claim procedures with the Corporate Credit Card provider-Bank of Montreal by calling MasterAssist Travel Accident Insurance 1-866-261-9763.

If an accident occurs while you are driving a company vehicle, the employee should ensure that a police report is filed after first handling injuries (i.e., calling police, medical assistance, etc.) and taking precautions at the accident scene to minimize harm to others. A copy of the police report and/or the case number should be obtained for Xcel Energy. The employee also should record all pertinent information about the accident, including other drivers' names, addresses, telephone numbers, insurance carriers, make of cars, etc. The employee should contact the Security Operations Center (SOC), report the accident to Xcel Energy Management and complete and send the <a href="Initial Report of Motor Vehicle Incident/Damage">Initial Report of Motor Vehicle Incident/Damage</a> form to the Claims Department and Fleet Management Group using the contact information included on the form. For additional information on the reporting guidelines for accidents in a company vehicle see corporate policy 10.3, Company Vehicle Assignment and Use.

If an accident occurs while you are driving a personal vehicle for company business, the employee should promptly initiate claim procedures with their own insurance provider. The employee should also report the accident to Xcel Energy Management.

## **Parking**

The lowest-cost alternative should be selected for parking associated with business-related events, including airport parking.

Parking for a business-related activity is reimbursable only if the amount incurred is from:

- A location other than the employee's normal work location or,
- The employee's normal work location and the parking expense was incurred after the employee paid the initial parking fee. For example, if the employee paid \$10 to park at his or her normal work location, that \$10 is not reimbursable. If the employee left his or her normal work location for business at another location and paid another \$10 to return to his or her normal work location, only the second \$10 parking fee would be reimbursable. Efforts should be made to minimize this type of parking expense.

The following parking expenses are not reimbursable:

- Monthly parking or a portion of monthly parking if incurred at normal work location
- Weekend parking if incurred at normal work location
- Parking tickets or expenses associated with towing a vehicle

## **Executive Travel**

Restrictions on management levels traveling together are intended to ensure continuity and guard against the loss of senior leadership should an accident occur. The following restrictions apply to air travel:

- Xcel Energy's Chief Executive Officer (CEO) shall travel with no more than two of his or her direct reports (SVPs).
- No more than three of the CEO's direct reports (SVPs) shall travel together.
- No more than 50 percent of SVPs direct reports can travel with him or her.

The CEO must approve exceptions to these restrictions prior to travel.

While these travel restrictions focus on executive management levels traveling together, similar provisions should apply to all employee groups.

## **Corporate Aircraft**

The company operates corporate aircraft to efficiently transport employees and business associates throughout the United States and Canada. Corporate aircraft are used to save time and enhance employee productivity.

The priority for use of corporate aircraft is determined by the needs of:

- Executive Committee Members (CEO and members of his or her Executive Committee)
- 2. Vice president level direct report to an Executive Committee Member
- 3. Other employees

The following are authorized to schedule corporate aircraft:

- Executive Committee Members
- Vice president level direct reports to an Executive Committee Member

An Executive Committee Member or vice president level direct report to an Executive Committee Member must be on board each flight.

Commercial travel should be considered first for long distance, single destination trips requested by executives other than the CEO.

Open seats on scheduled flights are available to any employee traveling for business at no charge to the business area. Reservations for open seats are made on a first-come-first-serve basis.

Reserved seat bumping is done only as a last resort to meet the needs of Executive Committee Members or members of the Xcel Energy board of directors. A business unit vice president can bump with seven days notice.

Flights are generally limited to four days per week involving travel between Minneapolis, Denver and Amarillo.

A flight with fewer than five passengers may be subject to cancellation.

<u>Flight Schedules</u> – Aircraft Schedules and Passenger Schedules can be viewed on the Aviation Services website. The Aircraft Schedule shows all scheduled flights for the next 45 days. The Passenger Schedule shows trip reservations and ground travel requirements for each passenger in the same upcoming 45-day period.

To make a reservation on the corporate aircraft, employees must contact the Aviation Services Travel Scheduler. A description of the business reason for the travel must be submitted with reservation requests.

Hazardous materials are not allowed on company-owned or contracted aircraft. Firearms are not allowed on company-owned or contracted aircraft unless approved by the CEO or required by the Transportation Security Administration (TSA) into certain airports.

Passengers must comply with all flight safety rules and procedures. The aircraft pilot-in-command maintains final authority on aircraft operation and safety of flight.

Smoking and alcohol consumption is not permitted on board company aircraft.

A passenger who appears to be intoxicated will not be allowed on board.

Flights on corporate aircraft will not be scheduled for personal use. Limited non-business travel for employees and/or their relatives on corporate aircraft will be permitted on business trips only if seats are available and approval is obtained before the flight from the Director, Aviation Services. In accordance with IRS requirements, personal travel may result in additional imputed personal income and additional income taxes to the employee benefiting from the personal travel, based upon published U.S. Department of Transportation Standard Industry Fare Level (SIFL) rates.

Non-employee passengers whose flights are supporting Xcel Energy business must have their transport on corporate aircraft pre-approved by an employee at or above the vice president level.

Approval must be obtained from the CEO prior to transport on corporate aircraft of candidates for public office or elected/appointed public officials. Two general rules follow:

- Local, state or federal candidates or their representatives should not be transported during an election campaign in which they are candidates.
- Avoid situations where the transport of any candidate or public official could be construed as an attempt to influence the outcome of an election or any pending or proposed legislation that is of interest to the company.

### **Charter Air Services**

Employees may use charter air services when corporate aircraft are not available and travel by commercial airline is not a feasible alternative, provided that Aviation Services screens and approves charter air services prior to use to ensure the charter operator's compliance with safety procedures, crew qualifications, aircraft airworthiness and adequate insurance coverage. Xcel Energy Aviation Services schedules such charters so that their use can be documented for possible Federal Aviation Administration or legal inquiries and to monitor the quality of service provided.

## **Travel on Non-Xcel Energy Business Aircraft**

The Director, Aviation Services, should provide approval to employees before they travel on another company's private aircraft to ensure compliance with standards established for corporate aircraft operations or charter contractors.

## **Personal Aircraft**

Due to liability and insurance coverage concerns, employees are not permitted to travel on behalf of the company in personal aircraft or aircraft not flown by professional pilots. Personal aircraft refers to aircraft owned, rented or operated by individuals whose primary job function is not that of a pilot.

#### **Commercial Air Travel**

book first-class or business-class air travel and related expenses are not reimbursable.

Contact the <u>Travel Management Company</u> to negotiate discounted rates for group travel of 10 or more traveling together. Avoid penalty fares and refundable tickets.

In general, a non-refundable ticket is less expensive than a fully refundable ticket. Non-refundable tickets must be purchased whenever available. Every attempt must be made to book travel at least 14 days in advance of the trip. If plans change and a future trip is anticipated, the ticket can still be used.

Tickets for air travel will be issued as electronic tickets whenever possible and will be e-mailed, along with an invoice/itinerary, directly to the e-mail address in the employee's profile. Paper tickets will be issued only for airlines that do not offer electronic tickets. Service fees for booking airline reservations are reimbursable.

Last-minute arrangements, changes and/or cancellations should be avoided whenever possible as they substantially increase travel costs and frequently result in penalties.

Employees are responsible for canceling reservations. Employees are responsible for notifying an agent at the <u>Travel Management Company</u> of the unused ticket so the credit information is properly recorded and applied to the next ticket purchased. A change fee and any increase in the non-refundable fare at the time of the change will apply; however, the additional charges are generally still less than the cost of a full coach fare. Submit a copy of the original itinerary and documentation of additional charges (if any) with your expenses.

#### International Travel

Periodically international travel may be required. Business Area Executive Leaders must approve all international travel, excluding Canada. Employees are expected to book travel according to the air travel practices listed above with the following additions:

- Contact the Legal Services department at 612-215-5207 or 612-215-4587 before making international travel arrangements to discuss export control compliance.
- If travel is to a potentially questionable international location, contact the Security Operations Center at 612-330-7842 to prepare a Foreign Travel Threat Assessment. The assessment could include the following information:

- Security systems and physical security issues at the choice of lodging,
- Air travel warnings from the State Department,
- o Transportation issues within the country,
- o Special medical needs, and/or
- Registering the trip with the State Department in case of emergency.
- It also is advisable for the employee to call <u>Corporate Credit Card</u> <u>customer service at 303-628-2896</u> to inform them of the upcoming international trip. This helps ensure that the employee's card is not inactivated for unusual activity.
- If any one particular leg of the flight is greater than six hours in duration and/or crosses an ocean, it is permissible to consider upgrading to business class. Final approval to upgrade to business class must be obtained from the employee's Business Area Executive Leader or higher before booking.

#### **Combined Business and Personal Travel**

When combining personal and company business travel, the business trip portion must be booked through the <u>Travel Management Company</u>. The personal travel portion also may be booked with the travel management company; however, all personal travel costs must be paid for separately.

Employees may arrive early or extend their stay at a business destination. For more information on early or extended stay, refer to the <u>"Early Arrival or Extended Stay"</u> section.

### **Non-reimbursable Travel Expenses**

Non-reimbursable expenses include:

- Incremental expenses incurred as a result of personal stopovers, weekend side trips or other personal travel scheduled within or around the business itinerary.
- Excess baggage charges for personal items (excluding bag fees required by the airline, such as for the first checked bag), personal grooming, laundry services, health-related expenses (except for emergencies not covered by the employee's medical insurance program), late payment fees associated with reimbursement for use of personal credit cards, personal travel insurance, loss of cash advance money or personal funds, dependent care expenses and household expenses incurred during an

employee's travel.

- Purchase of luggage, clothing or other personal items is not reimbursable.
   If items are lost in transit, employees should replace items, attempt reimbursement through airlines (or other vendors), then via homeowners insurance.
- Traffic/parking fines, towing, court costs, airline club memberships, class upgrade charges for airline (excluding premium seat upgrades), personal entertainment expenses, personal gifts, personal reading materials, airline headset rental, etc.

## **Spousal Expenses**

The company will generally not reimburse a spouse's expenses. All expense reports requesting the company pay for spousal travel must include appropriate documentation. This should be approved in advance and include a brief explanation as to why the spouse's attendance is required. Should a business activity require the employee's spouse to attend a particular business event, and the employee wants to be reimbursed for his/her spouse's expenses, the following must be satisfactorily met:

- In determining if the employee's spouse or any other person accompanying the employee has a bona fide business purpose, a relevant question is whether the spouse's presence is necessary to the conduct of business, not whether it is helpful. The performance of some incidental service by a spouse does not meet the bona fide purpose rule.
- There is a bona fide business purpose for the spouse's travel expenses
  where his or her presence helped the employee promote the public image
  of the company, conduct a business transaction, enhance the morale of
  company representatives, and/or cultivate business relationships. The
  company may require a spouse of an executive to accompany the
  executive on company-sponsored trips. For reimbursement, the spouse
  must attend social functions, other meetings as appropriate and assist the
  employee.
- There is not a bona fide business purpose when the spouse attends a convention, seminar, industry meeting, training class, etc., with the employee.

### **Mobile Devices**

Mobile Devices are indispensable tools for our workforce. Mobile devices are capable of email, Internet browsing, document storage and remote access to Xcel Energy Information Systems.

Xcel Energy business conducted through a Mobile Devices must be done in a secure manner to reduce information security risks that can result in a negative impact on the company.

Xcel Energy permits two types of reimbursable accounts for Mobile Devices: Corporate Responsible Account and Personal Responsible Account.

## **Corporate Responsible Account**

A Corporate Responsible Account is in Xcel Energy's name and Xcel Energy bears payment responsibility to the communication service provider using the Corporate Credit Card. Corporate Responsible Accounts may only be used by:

- Bargaining unit employees
- Non-bargaining employees that share Mobile Devices or pooledminute plans with other employees

## **Personal Responsible Account**

A Personal Responsible Account is in an employee's name and the employee bears payment responsibility to the communication service provider using personal credit card or funds. Employees may use a Mobile Device to conduct company business under a Personal Responsible Account if the employee:

- Is required to be on-call after normal working hours
- Works in the field or a plant location and it is necessary to be in communication with other employees
- Works in a corporate office but frequently travels and it is necessary to be in communication with other employees
- Is in a leadership role and it is advantageous to Xcel Energy to conduct business when not in the office

The acquisition of, use of and reimbursement of charges associated with Mobile Devices must be in accordance with the <u>Mobile Device Standard</u>.

Xcel Energy has negotiated discounts with several communications service providers that apply to both Corporate Responsible Accounts and Personal Responsible Accounts. Information on these providers can be found at the <a href="Cell-Phone Service">Cell-Phone Service</a> webpage. The corporate negotiated discounts are available to all employees, including use that is intended for personal purposes only, and employees are encouraged to take advantage of corporate discounts and special promotions for free or low cost Mobile Devices from communications service providers.

## **Telephone Charges While Traveling**

Employees traveling should make business-related telephone calls from company locations whenever possible, and/or use a calling card or Mobile Device to avoid direct-call fees from hotels or other public locations that charge high rates. While traveling, reimbursement of personal telephone calls of a reasonable duration and frequency is permitted provided the employee uses the most economical means available.

Non-bargaining employees who use their Mobile Device for incidental business or personal telephone calls while traveling, and who do not have a Personal Responsible Account, may request reimbursement as outlined in the Mobile Device Standard.

## **Employee Recognition**

The company recognition program rewards behaviors that demonstrate our company values, years of contribution and dedication, retirements, outstanding efforts and results, and going above and beyond the call of duty. Employee Recognition is subject to area Vice President, Director or Manager discretion and budget constraints. Employee Recognition expenses need to be reasonable in amount, have a business purpose and comply with the <a href="Code of Conduct">Code of Conduct</a>.

**Only** regular, benefited employees, both part-time and full-time, are eligible. Non-employees are not eligible.

#### **XCelebrate Recognition**

Refer to the Xcelebrate recognition website when recognizing benefited employees for outstanding efforts and results, going above and beyond the call of duty, or demonstrating our company values. The website includes details of the Xcelebrate recognition program. This program should be used for all recognition expenses funded by the corporate recognition budget.

#### **Additional Recognition Opportunities**

Additional opportunities are available to recognize one or more benefited employee for work related accomplishments and/or engagement. Expenses are charged to business area budget and should be paid for using a Corporate Credit Card and must be submitted and reconciled through the Expense Management System.

- Career Event Food/gift provided to acknowledge career-related achievements, including receiving certification, years of service, retirement; graduation or promotion.
- Life Event Gift for a Life Event, which is defined as funeral or major medical situation, the birth or adoption of a child, should not exceed \$70 per person, per event and should be limited to benefited employees and immediate family members.
- **Employee Engagement -** Employee Engagement and team building activities, plant tours, incentives/campaigns based on specific department goals, etc., meals, gifts/awards and other associated expenses.

## **Employee Recognition – Entertainment**

Employee Recognition-Entertainment includes entertainment expenses such as tickets for sporting events, other ticketed entertainment and recreational events (e.g., golfing, fishing, resort activities, etc.), and associated meals.

Gift amount should not exceed \$70 per event. See the Meals and Entertainment section for the recommended per meal guidance and maximum reimbursement, Expenses are subject to area Vice President, Director or Manager discretion and budget constraints. Expenses need to be reasonable in amount, have a business purpose and comply with the <u>Code of Conduct</u>.

Employees are encouraged to recognize other events, such as graduations, birthdays, weddings, showers, etc., during breaks and/or lunch hours with business area approval. The company will **not** reimburse associated expenses for such gifts or catering. Gifts given from one employee to another employee are not reimbursable.

**Safety Recognition** - Safety recognition is addressed through the safety program.

## Candidates for Office and Elected or Appointed Public Officials

Contact the Manager, Political Compliance and Engagement, before incurring expenses related to candidates for office and elected or appointed public officials.

## **Foreign Currency Transactions**

For expenses incurred when traveling to a foreign country (e.g., Canada), the expenditures recorded on the expense report must be in U.S. dollars, reflecting the proper exchange rate.

Where cash expenses are incurred in foreign currency, it is the employee's responsibility to obtain the most favorable official currency conversion rate.

## **Expense Advances**

Cash advances for travel expenses or reimbursement of travel expenses prior to the filing of an expense reimbursement statement are not allowed. Employees are expected to obtain and use the corporate credit card for all expenses related to meals and/or business travel.

#### **Per Diems**

A per diem is a daily allowance given to bargaining unit employees to cover expenses related to meals and/or business travel, as opposed to a reimbursement of actual expenses. Depending on certain circumstances a per diem payment can be either taxable or non-taxable and must be reported on an employee's W-2 Form in either case. In order to facilitate proper tracking and reporting, all per diem payments need to be processed through the time entry system. Per diems shall not be entered in the Expense Management System.

## Other Reimbursable Travel and Business Expenses

Employees should seek prior approval by the appropriate Business Area Executive Leader for reimbursement of charges associated with club or organization dues and account for these expenses in the appropriate type of cost and expense type.

At the discretion of Xcel Energy's CEO, full or partial reimbursement of capital assessments associated with country club memberships or other social organizations may be permitted upon prior approval of Xcel Energy's CEO. Generally, such reimbursement authorization will be afforded only to Xcel Energy board-appointed officers, based on sound business-related rationale and will require separate type of cost and expense type.

Unless addressed earlier in this policy, all other reimbursable expenses are to be paid directly by the employee and will be reimbursed if reasonable and appropriate.

#### **Tips and Gratuities**

Tips and gratuities should be reasonable in relation to the locale visited and commensurate with the service performed.

## **Capital Charges with a Corporate Credit Card**

Capital purchases on Corporate Credit Cards are permissible with prior business unit management approval and completion and submittal of the Authorization Form located in the <u>Capital Charges with Corporate Credit Card policy</u>. Prior to use of a Corporate Credit Card for Capital purchases, the business unit is responsible to review and adhere to the <u>Capital Charges with a Corporate Credit Card policy</u>.

## **Consequences for Violations**

Travel and business expenses are monitored and compliance with this policy is enforced. All company-related travel or business expenses are subject to audit before and/or after reimbursement.

Failure to comply with this policy or falsification of expense-reimbursement documents is considered theft and may result in denial of reimbursement for claimed expenses, disciplinary action, termination and/or prosecution.

### **Definitions**

<b>Business Area</b>	
Executive Leader	

Employees with a job grade of V or higher.

## **Business Meal**

This is a meal that principally benefits the company, including catered meals. Business meals may include employees and/or non-employees. Business meals are generally not associated with travel; however, if this meal occurs while traveling, it must be coded as a business meal.

## Corporate Responsible Account

The type of account for purchasing Mobile Data Services, Mobile Voice Services and/or Mobile Devices that is in Xcel Energy's name and for which Xcel Energy bears payment responsibility to the communication service provider.

## **Employee**

Legal definition of an employee, not a person who is contracted through an outside agency to perform work for Xcel Energy.

## **Employee Recognition**

An expense incurred to recognize an employee for work-related accomplishments, which may consist of meals, gifts or entertainment.

#### **Entertainment Event**

This is a ticketed sporting event, other ticketed entertainment or recreational event (e.g., golfing, fishing, resort activities, etc.) and other associated expenses. Any expenses associated with entertaining employees or non-employees are reimbursable only when the principal purpose of the activity benefits the company.

#### **Entertainment Meal**

A meal associated with an Entertainment Event.

# Executive Committee

The CEO and members of his or her Executive Committee.

# **Expense Management System**

The expense reporting system the company uses to reconcile employee expenses. It includes all Corporate Credit Card transactions for travel, purchase and cash out-of-pocket expenses.

#### Leader

An employee who supervises other employees (supervisors, managers, directors, vice presidents, executive offices, etc.)

#### Life Event

A major event in an employee's life, defined as a funeral or major medical situation, for which expense reimbursement is permitted for a gift such as flowers or a donation.

#### Meal

Food, non-alcoholic beverages, alcoholic beverages and associated taxes and tips.

### **Mobile Data Service**

Services purchased from a communications service provider that provides Internet access and email/calendar access which are accessible via a Mobile Device.

#### **Mobile Device**

Consumer-level Mobile Device such as smart phones (including BlackBerries, iPhones and Android phones), tablets (such as iPads and Android devices), and PDAs.

## **Mobile Eligible User**

An employee using Mobile Data Services and/or Mobile Voice Services that is authorized to either 1) use a Corporate Responsible Account; 2) submit reimbursement requests for a Personal Responsible Account.

### **Mobile Voice Service**

Services purchased from a communications service provider that provides telephone service and which are accessible via a Mobile Device.

#### Per Diem

A daily allowance given to bargaining employees to cover expenses related to meals and/or business travel, as opposed to a reimbursement of actual expenses.

## Personal Responsible Account

The type of account for acquiring Mobile Data Services, Mobile Voice Services and/or Mobile Devices that is in the employee's name and for which the employee bears payment responsibility to the communication service provider.

# Proper Supporting Documentation

An original or official paper, such as a detailed itemized receipt, showing all items purchased, and/or explanation with relevant details for expenses incurred that are not self-evident, signed by both employee and approving Leader.

#### **Proxy**

An employee who creates and submits and/or approves expense reports on behalf of another employee.

## **Recognition Meal**

A meal to recognize one or more employees for work-related accomplishments.

# Staff Augmentation Contractor

A person supplementing the company's work force who is employed by a staffing agency. The person is an employee of the contracted agency and receives wages or salary and benefits from that employer and not Xcel Energy. Xcel Energy pays the agency based on the contracted terms and conditions for the person's services. The use of 'Staff Augmentation Contractor' is synonymous with 'contingent workers or contract workers'.

## Stipend

A fixed amount paid to an employee on a regular basis (typically monthly) for a particular business purpose expense.

# Travel Management Company

Contracted travel provider utilized for commercial airfare, rental cars, and hotel reservations when planning travel.

Travel Meal A meal incurred for self while traveling for business.

**Type of Cost** An accounting classification used to categorize costs

by separate object accounts. This categorization drives internal reporting and financial statement

placement.

**Xcel Energy** Xcel Energy Inc.'s subsidiaries and affiliates. The

use of "we," "ours," or "the Company" is synonymous

with Xcel Energy.

#### References

Read and follow other corporate policies:

3.1, Code of Conduct

9.3, Alcohol and Drug-free Workplace

10.3, Company Vehicle Assignment and Use

Also read and follow the:

Mobile Device Standard

12.1.170, Personal Protective & Safety Equipment Policy

Purchasing Guidelines (Matrix)

XCelebrate website

Any questions concerning interpretation of, or compliance with, this policy should be referred to the <u>Director, Supply Chain Process Control</u>. Interpretations will be made in consideration of the Internal Revenue Code and regulations.

## **History of Revisions**

December 17, 2016 December 9, 2015 December 19, 2013 March 18, 2013 October 5, 2012 May 4, 2011 January 21, 2011 June 9, 2010 February 5, 2010 August 19, 2009 March 6, 2009

## **Approval**

Docket No. E002/GR-19-564
Exhibit\_\_\_(GJO-1), Schedule 2
Expense Reimbursement (Policy 10.2)
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Northern States Power Company Employee Expense Policy

Travel and Employee Expense Reimbursement (Policy 10.2)
Page 30 of 30

This policy was approved by Gary O'Hara, vice president, Supply Chain and Marvin E. McDaniel Jr., executive vice president, group president – utilities and chief administrative officer.

## Xcel Energy Corporate Policy Changes – Travel and Employee Expense Reimbursement (Policy 10.2) Changes Since November 2015

Several changes were made in December 2015 and in December 2016 to the Travel and Employee Expense Reimbursement Policy 10.2 to ensure a consistent process for submitting and approving eligible employee expenses.

Date	Summary of Content Changes	Reasons for the Changes
12/09/2015	<ul> <li>Added the requirement for leaders to ensure employee expense reimbursement aligns with policy and budget when approving expenses.</li> <li>Clarified how consultant and contractor expenses should be managed.</li> <li>Removed the requirement for approving leader's signature when submitting the Lost Receipt form.</li> <li>Added guidance for cash out of pocket expenses when traveling.</li> <li>Clarified that business meals are not usually associated with travel.</li> <li>Updated primary cities for corporate aircraft travel.</li> <li>Revised published Aircraft and Passenger Schedule time frame from 90 to 45 days.</li> <li>Updated Employee Recognition content to reflect new Xcelebrate online tool and other recognition opportunities.</li> </ul>	<ul> <li>Emphasize the expectations that proper expense reimbursement process is necessary for the recovery of expenses as a component in rate filings.</li> <li>Update the changes in aviation as a result of the relocation to Minneapolis and changes in the scheduling process.</li> <li>Clarify that employee recognition is a priority for the Company and the new recognition tool offers more recognition options.</li> </ul>
12/17/ 2016	<ul> <li>Strengthened outline of appropriate business purposes.</li> <li>Better defined receipt requirement for all cash-out-of-pocket transactions.</li> <li>Added clarification of company sponsored program events for</li> </ul>	Increase employee     understanding on eligible     business expenses and     expense reporting.

## Xcel Energy Corporate Policy Changes – Travel and Employee Expense Reimbursement (Policy 10.2) Changes Since November 2015

employees and/or non-employees being applicable for entertainment events and meals.

- Clarified that rental vehicle refueling should be at the highest cost benefit to the company.
- Aligned with Company Vehicle Assignment policy (10.3) on accident reporting for company vehicles and personal or rental vehicles when driving for business.
- Clarified that only benefited employees are eligible for employee recognition program rewards.
- Updated Expense Advances section to indicate cash advances for travel are not allowed.
- Added Capital Charges with a Corporate Card section to outline and link to the existing Capital Asset Accounting policy and guidelines.
- Updated definitions, including addition of Employee and Staff Augmentation and removal of Expense Reimbursement Statement.

Docket No. E002/GR-19-564 Exhibit\_\_\_(GJO-1), Schedule 4 Page 1 of 6

## **Employee Expense Commitments**

Source	Commitment	Where Addressed in TY 2020 Rate Case
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Provide direct testimony in future rate cases which explains all employee expense data in the Company's technical systems.	O'Hara Direct, Section III, Employee Expense Reporting, and O'Hara Direct, Section V, Employee Expense Review and Development of EER Schedules, discuss employee expense data in SumTotal, SAP, Corporate PassPort, and TIME applications.  EER Schedules 10, 11 and 12 provide a summary of employee expenses processed in systems other than SumTotal. Provided on compact disk, Required Information Vol. 3.
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Provide direct testimony in future rate cases which explains the process used by the Company to create the EER Schedules, including any limitations.	O'Hara Direct, Section V, Employee Expense Review and Development of EER Schedules, discusses the process used to develop the EER Schedules and limitations of this process.  O'Hara Direct, Schedule 8 provides the details of the process used to develop the EER Schedules.

Docket 1	No. E002/GR-19-564
Exhibit_	_(GJO-1), Schedule 4
	Page 2 of 6

TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Provide direct testimony in future rate cases which explains the types of employee expenses the Company is not seeking to recover in rates.	O'Hara Direct, Section V, Employee Expense Review and Development of EER Schedules, describes the types of transactions that the Company is not seeking to recover in rates. This Section also describes what expenses are included in the Employee Expense Adjustment.  O'Hara Direct, Schedule 8 provides process details for what is included in and excluded from the EER Schedules as well as the development of the Employee Expense Adjustment.
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Provide direct testimony in future rate cases which explains the progress made to improve the reporting of employee expenses and compliance with the Employee Expense Policy.	O'Hara Direct, Section III A, SumTotal, discusses SumTotal characteristics and training. O'Hara Direct, Section III C, Internal Controls and Monitoring, describes how the Company is monitoring compliance with the Employee Expense Policy and appropriate reporting of employee expenses.
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Provide direct testimony in future rate cases which explains the findings of any recent internal audits regarding employee expenses.	O'Hara Direct, Section III C, Internal Controls and Monitoring, discusses the Company's 2018 internal audit of employee expense reporting.
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Provide EER Schedules in a manner that facilitates review and quantification of categories.	EER Schedules are provided in Volume 3, Required Information, Section IV Other Required Information, Tab 2. Concurrent with this rate case filing, we are providing the OAG and the Department of Commerce live Excel spreadsheets of the EER Schedules to facilitate their review.

		rage 3 01 0
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Update the OAG and the Department of Commerce of changes the Company intends to make to the Employee Expense Policy, employee expense reporting systems, or other changes that will affect the Company's future reporting under the Expense Statute.	Since we implemented the significantly revised Employee Expense Policy and SumTotal in October 2012, there have not been major plans to change the Policy or employee expense reporting systems.  O'Hara Direct, Section III A, SumTotal, discusses current SumTotal features and any planned improvements.  The Company made some changes to the Employee Expense Policy in December 2015 and December 2016. O'Hara Direct, Schedule 2 provides the current Employee Expense Policy and Schedule 3 presents a summary of the changes.
TY 2011 Electric Rate Case (GR-10-971) O'Hara Surrebuttal	Meet with the OAG prior to filing future rate cases to discuss how to streamline regulatory review of employee expenses.	Met with the OAG shortly before filing this rate case.
February 22, 2012 ALJ Findings of Fact (GR-10-971)	Include a report of the total compensation for employees engaged in lobbying, with an explanation of the costs included and excluded in the rate request.	O'Hara Direct, Section VI, Compliance Item on Lobbying Compensation, discusses compensation for employees engaged in lobbying.  O'Hara Direct, Schedule 9 provides the total compensation for employees engaged in lobbying, with an explanation of the costs included and excluded in the rate request.
June 20, 2012 Meeting with OAG	Provide direct testimony describing how we will implement SumTotal, including safeguards which are in place so no bulk information is missing, whether all fields will map similar to Concur, and whether we will have problems updating data.	SumTotal has been in place since October 2012, and the Company has discussed its roll out and initial implementation in three prior rate cases. O'Hara Direct, Section III A, SumTotal, discusses the characteristics of SumTotal.

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Exhibit	_(GJO-1), Schedule 4
	Page 4 of 6

June 20, 2012 Meeting with OAG	Provide direct testimony describing how we will preserve data from Concur after SumTotal is in place.	While we have preserved old Concur data (prior to October 2012 implementation of SumTotal), it was not used for preparing this rate case.
June 20, 2012 Meeting with OAG	Provide direct testimony comparing budget to actual data and trending data for employee expenses.	O'Hara Direct, Section IV, Employee Expense Amount, Employee Expense Adjustment, and EER Schedules, provides 2014-2018 budget to actual data and trending data for employee expenses.  O'Hara Direct, Schedule 6 provides the budgeted and actual employee expense data by expense category for 2016-2022.
June 20, 2012 Meeting with OAG	Provide direct testimony describing whether Concur has been used increasingly to track employee expenses and whether other Company systems are processing fewer employee expense transactions as a result.	O'Hara Direct, Section III B, Other Systems, discusses employee expenses in other systems than SumTotal, which replaced Concur in October 2012.  EER Schedules 10, 11 and 12 provide a summary of employee expenses processed in other systems than SumTotal.
June 20, 2012 Meeting with OAG	Provide direct testimony addressing improvements made in reporting to show compliance.	O'Hara Direct, Section III A, SumTotal, discusses SumTotal features. O'Hara Direct, Section III C, Internal Controls and Monitoring, describes how the Company is monitoring compliance with the Employee Expense Policy and appropriate reporting of employee expenses.

Docket	No. E002/GR-19-564
Exhibit_	(GJO-1), Schedule 4
	Page 5 of 6

June 20, 2012 Meeting with OAG	Provide direct testimony regarding training to address entry of meal expenses in SumTotal.	O'Hara Direct, Section III A, SumTotal, discusses SumTotal training and other resources provided to our employees to accurately document and approve employee expense transactions in SumTotal.  O'Hara Direct, Schedules 5A, 5B, and 5C provide copies of SumTotal training materials and job aid manuals, which also address entry of meal expenses.
June 20, 2012 Meeting with OAG	Provide direct testimony regarding how recognition issues (including gift cards) are handled.	O'Hara Direct, Section V, Employee Expense Review and Development of EER Schedules, page 34-35, discusses employee recognition expenses.
June 20, 2012 Meeting with OAG	Prior to the next rate case filing, check with the OAG to confirm best way to present EER Schedules.	Met with the OAG shortly before filing this rate case.
June 20, 2012 Meeting with OAG	EER Schedules to contain the gross amount as well as the NSPM company amount.	O'Hara Direct, Schedule 8 provides details of the data and process used to develop the EER Schedules. The EER Schedules contain the gross amount as well as the NSPM company amount.
September 3, 2013 Commission Order (GR-12-961), (superseded by the May 8, 2015 Commission Order)	Provide flight data reports for the most recent 12-month operational period, including charged employee, each employee passenger and their assigned operating company, other passengers and their reason for use, and primary purpose for using the flight.	O'Hara Direct, Section I, Introduction, states that the Company is not requesting recovery of any corporate aviation expenses in this rate case.  O'Hara Direct, Section II, Definition and Governance of Employee Expenses, states that because the Company is not requesting recovery for any corporate aviation expenses in this rate case, we have not provided the flight log information.

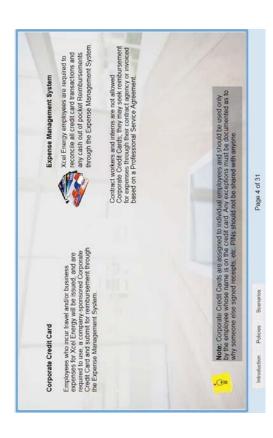
Docket No. 1	E002/GR-19-564
Exhibit(G	JO-1), Schedule 4
	Page 6 of 6

September 3, 2013	Provide information for the calculation of the	O'Hara Direct, Section II, Definition and
Commission Order (GR-	requested recovery amount of corporate aviation.	Governance of Employee Expenses, states that
12-961)		although the Company is not requesting recovery of
		any corporate aviation costs in this rate case, EER
		Schedule 8 provides expense data related to
		corporate aviation to ensure completeness.
May 8, 2015	In future rate cases seeking recovery of corporate	The Company is not requesting recovery of any
Commission Order (GR-	aviation, provide more detailed, accurate records of	aviation expenses in this rate case and consequently,
13-868)	the actual business purpose for flights that are	is not providing more detailed records of the actual
	scheduled, rather than reducing all flights to a	business purpose for flights.
	generic "code."	

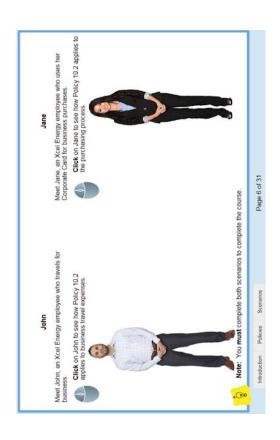


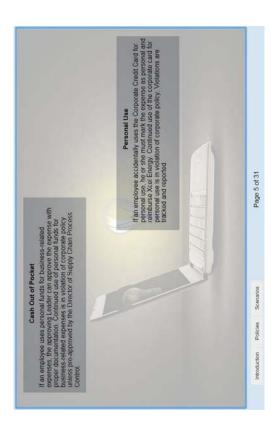
Updated 1/1/2019



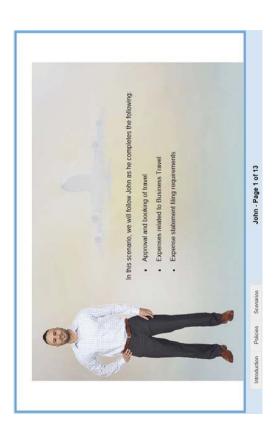


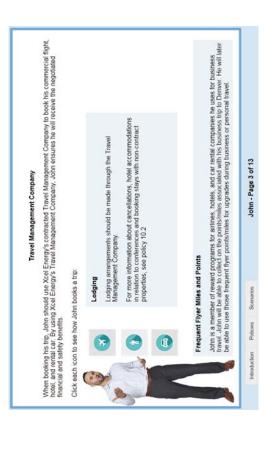












When booking his trip, John should use Xcel Energy's contracted Travel Management Company to book his commercial flight, trotiel, and retails car By Laring Xcel Energy's Travel Management Company, John ensures he will receive the negotiated financial and safety benefits.

Click each icon to see how John books a trip.

Air Travel

Travel Management Company

Commercial lights are the most common type of air travel used by Xcol Energy employees when traveling for business. Policy 10.2 outlines the guidelines around the other types of air travel including use of the corporate aircraft.

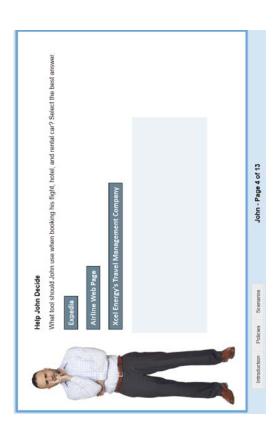
John is a member of reward programs for airlines, hotels, and car rental companies he uses for business travel. John will be able to collect on the points/miles associated with his business trip to Deriver. He will later be able to use those frequent flyer points/miles for upgrades during business or personal travel.

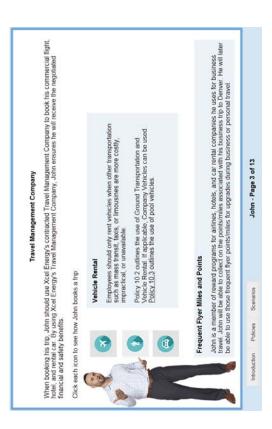
Frequent Flyer Miles and Points

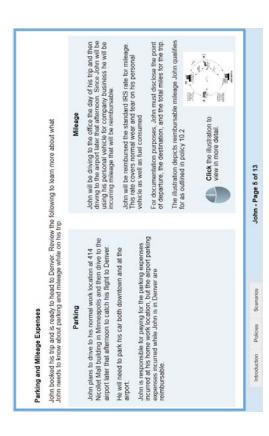
John - Page 3 of 13

Scenarios

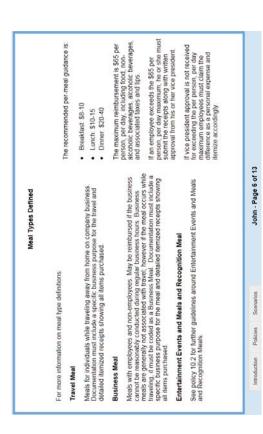
Policies

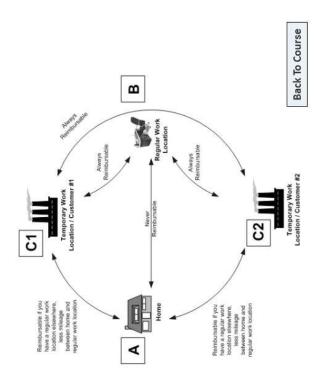


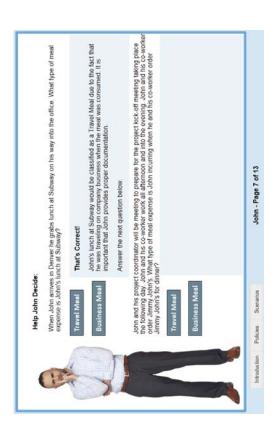
















The Jimmy John's meal is classified as a Business Meal. The Intent of the meal of what changes the classification from fixed meal to business meal. The intent of the meal would be for John and his co-worker to continue working through of the meal would be for John and nis co-worker to continue working fittough frough meant to ensure and all preparations are combined princip in most days project kick-off mealing. Due to the 1ght Innelines it makes the most series to order a documentation, and controlling working. It is important that John provides proper documentation.

John - Page 7 of 13

Click the Next arrow to continue.

John and his project coordinator will be meeting to prepare for the project kick-off meeting taking place the following day, John and his co-worker work all affernoon and into the evening, John and his co-work order. Limmy John's What type of meal expense is John incurring when he and his co-worker order fillimmy John's Vinta type of meal expense is John incurring when he and his co-worker order fillimmy John's for dimeet?

That's right!

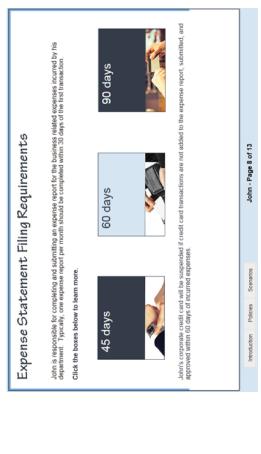
Answer the next question below

John's lunch at Subway would be classified as a Travel Meal due to the fact that he was treveling on company business when the meal was consumed. It is important that John provides proper documentation.

When John arrives in Denver he grabs lunch at Subway on his way into the office. What type of meal expense is John's lunch at Subway?

Help John Decide:

That's Correct!



nent system daily if credit card transactions are not added to the expense report

John will be notified by the Expense Man within 45 days of the incurred expenses.

John is responsible for completing and submitting an expense report for the business related expenses incurred by his department. Typically, one expense report per month should be completed within 30 days of the first transaction.

Click the boxes below to learn more.

Expense Statement Filing Requirements

90 days

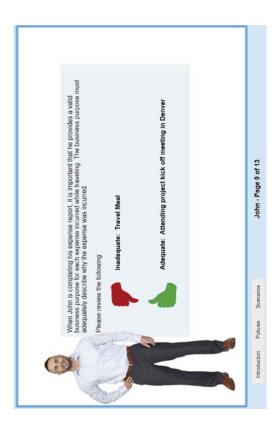
60 days

45 days

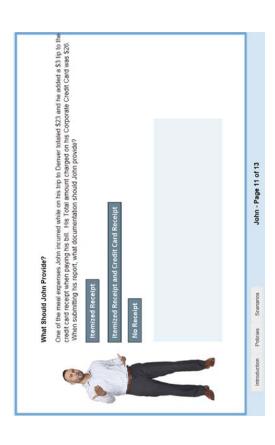
Delinquency notifications are sent to notify the spender and their leader of expense report(s) with transactions that are more than 45 days after the credit card transaction(s) posting date.

John - Page 8 of 13

Policies

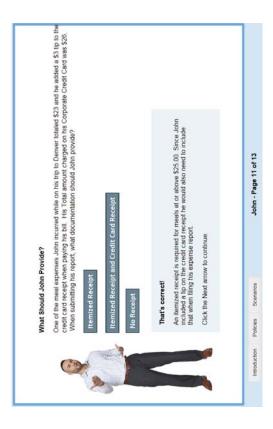






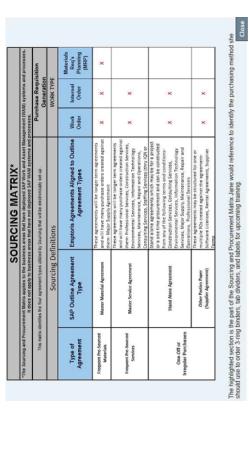












One of Jane's coworkers has asked Jane to order 3-ting binders, tab dividers, and labels for upcoming training.

Jane references the Sourcing and Procurement Matrix to identify the purchasing materials.

Type of Purchase

Olick on thumbnail to learn

Purchasing Author

Purchasing Method

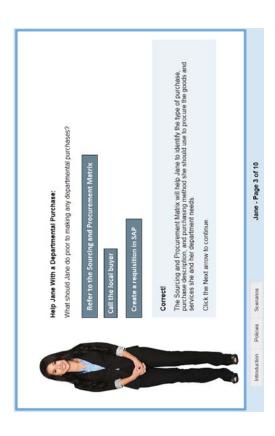
Procurement Matrix.

Jane has dentified she can use her Corporate Credit Card to purchase the Sourcing and Procurement Matrix.

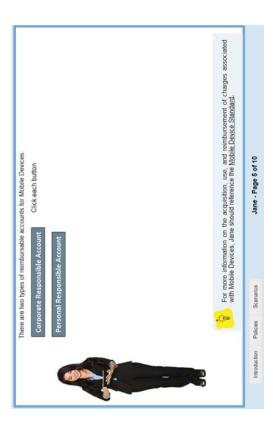
It is important for Jane to reference the Sourcing and department.

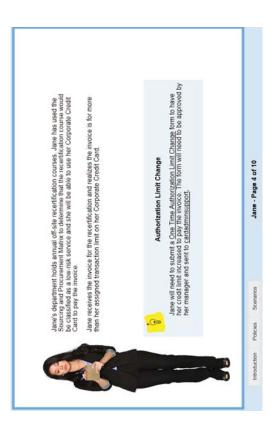
Purchasing Method

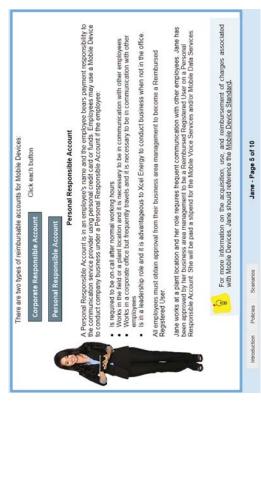
Jane Pass Sourcing and Procurement Matrix when making purchases for her department.

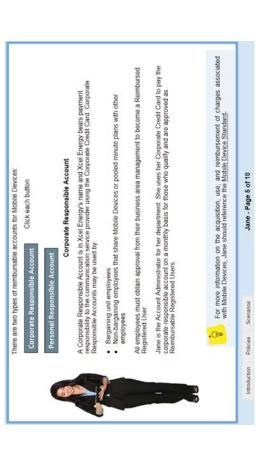


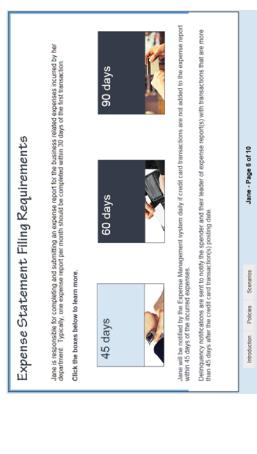












Jane is responsible for completing and submitting an expense report for the business related expenses incurred by her department. Typically, one expense report per month should be completed within 30 days of the first transaction.

Click the boxes below to learn more.

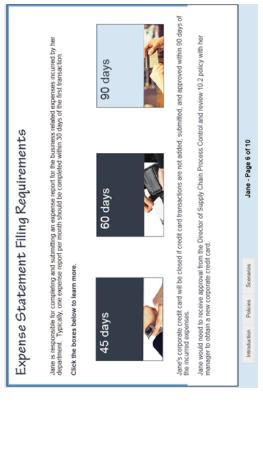
Expense Statement Filing Requirements

90 days

60 days

45 days

Jane - Page 6 of 10



Jane's corporate credit card will be suspended if credit card transactions are not added to the expense report, submitted, and approved within 60 days of incurred expenses.

Jane - Page 6 of 10

Jane is responsible for completing and submitting an expense report for the business related expenses incurred by her department. Typically, one expense report per month should be completed within 30 days of the first transaction.

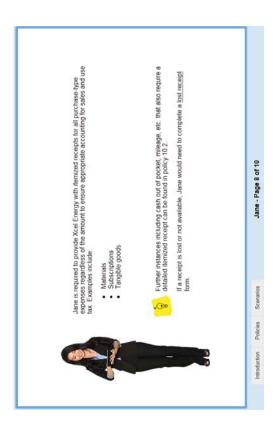
Click the boxes below to learn more.

Expense Statement Filing Requirements

90 days

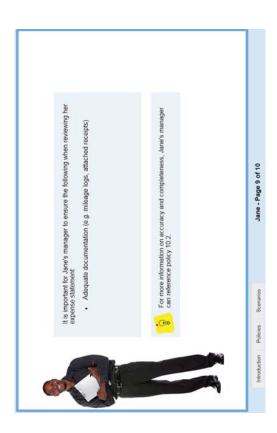
60 days

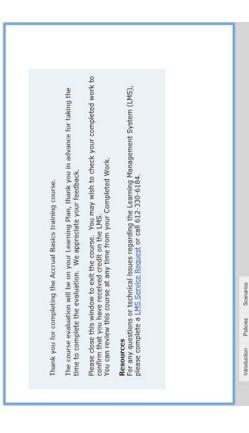
45 days











Page 30 of 31

Reminder: For more information about related policies, documents, and forms, please check out the Resources page.

You learned about the travel and purchasing guidelines of the Corporate Policy 10.2, Travel and Expense Reimbursement to be utilized in your daily job.

Thank you for completing the Travel and Employee Expense Reimbursement training.

The Learning Management System (LMS) offers more specific training reparding process and how to create and submit expense reports. While on the catalog site, search for the word "expense."

If you have unanswered questions or concerns, please send an email to the <u>Suppy Chain Hotling</u>.

For a more in depth training course see 'Creating and Submitting an Expense Report — LPN B5300C-002.



# <Corporate Card Department >

<b>Procedure Name:</b>	<sumtotal reconciliation—<="" th=""></sumtotal>	
	Creating and Submitting Expense Reports >	

**Responsibility:** 

Primary:	< Card Holders>	
Backup:	<sumtotal admins=""></sumtotal>	

<b>Frequency / Due Date:</b>	<monthly, 30="" days="" every=""></monthly,>
------------------------------	--

# **Summary / Background:**

A detailed process of how to create and submit an expense report, for expenses incurred on the BMO Purchase Card and Fleet Cards. Also, a detailed process of how to get reimbursed and how to pay back the company for Personal Expenses.

<b>Required Tools and System Access:</b>
--

(1) SumTotal			
(2) XpressNet			
(3)			

# **Contacts:**

Name	E-Mail Address	Phone	Department /
Name	E-Mail Address	Number	Title
Amanda Ornelas	Amanda.L.Andrews@xcelenergy.com	303-439-5834	Corp Card Depart
Karolyn Hedquist	Karolyn.T.Hedquist@xcelenergy.com	303-628-2648	Corp Card Depart
Vanessa Villa	Vanessa.Villa@xcelenergy.com	303-439-5801	Supervisor

#### **Procedure:**

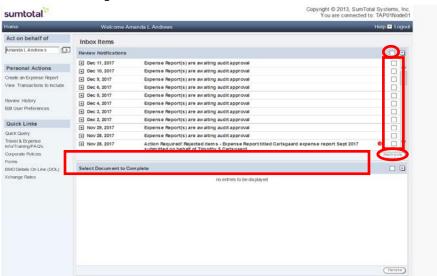
### **Detailed Process**

# Step One-- Log Into SumTotal

1. From XpressNet, click on Expenses from the Main Menu



- Your SumTotal password will automatically be changed every time you change your network password.
- 2. SumTotal Home Page-



- To remove notifications, select the check box to the right of the notification, or to select all, click the check box on the title bar and click **Remove**.
- This will clear all of the notifications.

3. To Log Out of SumTotal, user will click on the Logout button in the top right corner of the screen.



4. System will close and access to SumTotal will require a password to get back in.

#### **Step Two- Create and Expense Report**

1. Under the Personal Actions list, select Create an Expense Report.



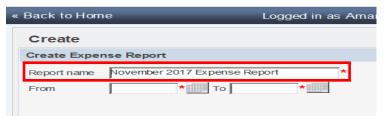
- Employees will submit one expense report per month.
- Credit card transactions must be reconciled every 30 days. Pick a day to always complete your expense reports and do so every 30 days. A 15 day grace period exists before notifications will be sent regarding delinquency of transactions based upon transaction posting date. Day 46 spender and manager will receive delinquency notifications daily until the transaction is included in an expense report. 60 day delinquencies will cause card to be suspended and 90 days, card will be closed.
- Example: If the spender picks the 15<sup>th</sup> of each month to prepare expense report on that expense report the spender should include all transactions prior to the 15th of that respective month to be included in the expense report. The spender will get a 15 day courtesy notice to complete an expense report based upon transaction date.
- Employees who are on Short Term Disability (STD) or Long Term Disability (LTD) will not be able to use their company BMO card. Managers should notify Supply Chain Hotline to temporarily suspend card until further notice.
- For more information on the policy please access the 10.2 here:
   10.2 Travel and Employee Expense Reimbursement

### **Step Three- Create a Report Header**

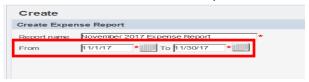
1. Expense Report Header Screen-



2. **Report Name**- Include Month/Year of expenses (i.e. July 2017 Expense Report). - The name should be descriptive of time period of expenses included in report.

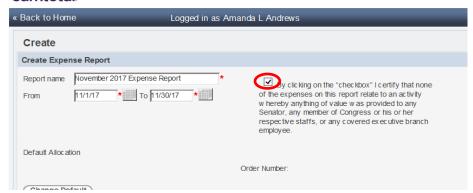


3. **From**- The first date will be the first date of expense items on your report and the second date will be the last date of expense items. To select a date, click on the calendar icon and click on the specific date.

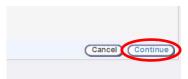


- If your expenses do not fall within that date range, it will flag the report as being not policy compliant. This will make the report go to audit after manager approval.
- Once the report has been submitted, the user cannot change the date range even if it has been rejected back to the employee.

4. **Certify Compliance**- Click the empty box next to the compliance message to check mark that you have read and understand the compliance message. **sumtotal** 



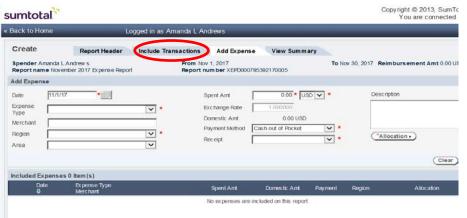
- Managers will reject expense report(s) if compliance checkbox is not checked.
- 5. Verify all fields with a red (\*) are filled out completely and efficiently, then click on the **Continue Button**.



- This will take the user to the Add Expenses Screen.

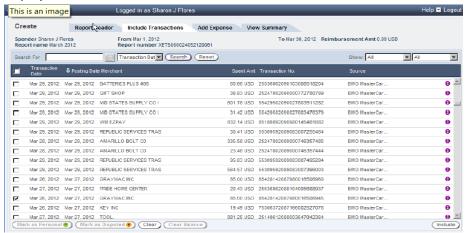
#### Step Four- Add Credit Card Transaction(s) to Expense Report

1. Click on the Include Transactions tab.



If the expense(s) have not came through to your include transactions, do
not go to the add expense tab and do them as Cash Out Of Pocket. Wait
until the expenses show up in the include transactions and then include
them in your expense report.

2. A list of all credit card transactions to be included in an expense report will be displayed.



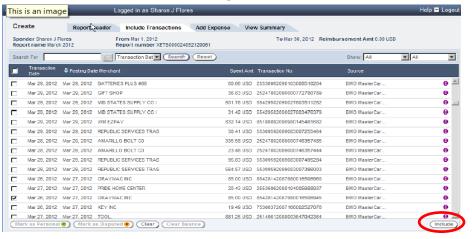
3. To add a **SINGLE** transaction to the expense report, click on the box next to the individual transaction in the list and then click on include.



4. To add **ALL** of the transactions listed in the include transactions tab, click the check box on the title bar.



5. Once the transactions have been selected that need to be included, click on the **Include** button towards the bottom right.



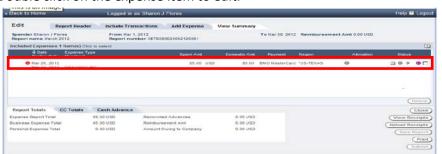
- If disputing fraudulent charges contact BMO directly. You will dispute the charges and BMO will do an investigation, and if they deem them as truly Fraudulent they will send a credit to your card.
- 6. The selected transaction(s) have moved to the **Included Expenses** section on the **Edit Expense Report** in the **View Summary tab**.



- The **Red** icon to the left of expense indicates the expense is missing required information.



7. Double click on the expense item to edit.



8. System displays transaction information on the **Edit Expense View** pane.



- 9. Bank transaction information populated in gray (user **cannot** edit):
  - **Date**-The Date the expense incurred from merchant.
  - Posting Date-The Date that the transaction(s) are received from MasterCard.
  - **Merchants Name**-The name of the merchant where the expense was incurred.

- Spent Amt.-Credit Card Transaction Amount.
- **Currency** USD, SEK, CAD, etc.
- Payment Method-BMO MasterCard, Cash Out of Pocket, etc.
- 10. The populated fields that can be edited and the information that's required to be populated are the fields with a red (\*) next to them.



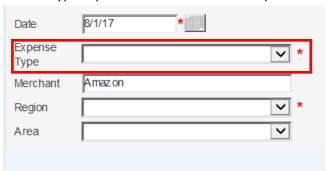
- **Expense Type** Select the correct expense type from the drop down options.
- **Region** State where the expense was incurred.
- **Area** City where the expense was incurred.
- Receipt- Select Not required, Receipt Included, Lost or VAT Receipt Included.
  - Receipt field will default based on expense type selected. Per 10.2
     Policy- Itemized Receipts are required for all expense types except:
    - √ T- Taxi/Bus/Other
    - √ T- Parking
    - ✓ T- Tips/Tolls
  - These will default to Not Required, however a receipt is required for all expense(s) equal to \$25 and over, therefore in these circumstances a basic receipt with the amount will need to be provided and the Receipt field will need to be changed to Receipt included.
  - Itemized receipts are required to substantiate expense reimbursements.
     An Itemized receipt details items and amounts, sales tax paid and total amount. The Credit Card Slip that is signed for MasterCard is NOT an itemized receipt.
  - Users can scan the credit card receipts along with the itemized receipt. However the Itemized receipt is the required documentation.
    - ✓ If the tip amount is not included on the itemized receipt then the credit card receipt with the tip amount and total amount is required along with the itemized receipt.
  - Users and approving managers are required to ensure itemized receipts are provided with expense report(s). If receipt is lost, user is required to mark the Receipt field as "Lost" and fill out the "Lost Receipt Form", then scan and upload with expense report.
  - PII = Personal Identifiable Information- review the receipt if the full credit card number is legible, black it out so that it cannot be seen prior to scanning. Also if you owe money to Xcel and you scan a check in, please make sure you black out the acct. number, routing number and

address.

 Cross out credit card number on receipt if more than 4-digits are showing.

### Step Five- Select Purchase Expense Type and Fill in Required Fields

1. Purchase type expense is reconciled at the expense level (not itemized).



- Expense Types are grouped by "M" (Meals), "P" (Purchase) and "T" (Travel) categories.
- All Meal type expenses require itemization at line item level to identify meal vs. alcohol portion of the expense.
- T-Hotel requires itemization to break down; room rate, tax, etc
- All other expense types are reconciled at expense level.
- 2. Click on down arrow in Expense Type field and Select a purchase expense type (preceded by "P").



3. Enter Business Purpose



- The business purpose is a detailed description of the business reason for the expense item. It must adequately describe why the expense was incurred.
- Users will enter a business purpose for each expense added to an expense report.
  - The Business Purpose should include detailed information about why the expense was incurred. Meal/Training is not valid.
  - The Description field (box) can be used for further explanation for

expense if required.

Examples- Fork Lift Training in Denver SAP Users Training in Denver

- When using expense types **Other Purchase** and **Other Travel** a description is required.
- 4. Click on **TAX INFO** tab to open Tax panel to enter sales tax information.



## Step Six- Enter Sales Tax for Purchase Expense Type

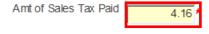
1.Merchants should charge tax on all credit card transactions. Sales tax amount will be populated for credit card transactions if merchant sends data in the following fields:



- Sales Tax Paid- Yes or No
- Amt. of Sales Tax Paid- this will be the amount of tax paid to vendor.
- Facility Code- Should automatically populate.
- 2.Click on **Sales Tax Paid** drop down arrow and Select Yes if sales tax was paid per receipt.



3.Click in Amt. of Sales Tax Paid Enter amount of sales tax paid from the itemized receipt.



- 4. Change Facility Code, if applicable.
- Facility Code defaults facility from user's profile. Facility Code is used to identify where you took possession of item(s) purchased or expects to use. Select appropriate facility code, if material was shipped/used at a location different than the users' facility.

- All facility codes are loaded. You may need to scroll down and/or select the Next button for additional facilities.
- 5. Some Expense Types that do not require tax are:

P-Charitable	P-Dues - Gas Utility	P-License/Fees/Permits	
Contribution	Assoc		
P-Civic & Political	P-Dues - Professional Assoc	P-Mail/ Frt/ Postage	
P-Community Sponsorships	P-Dues - Social Service	P-Permits/Fees - Environ	
P-Directors Fees	P-Dues - Utility Assoc	P-Permits-Temporary Cap Construction	
P-Dues - Chamber of	D. Joh Bootings	P-Personal Communication-	
Commerce	P-Job Postings	Service	
P-Dues - Elect Utility Assoc	P-Lawn Care		

- Expense types that do not require tax will not have the tax tab.
- 6.If no sales tax was paid click on the **Sales Tax Paid** drop down arrow and select no.



7. The amount of sales tax will automatically be set at 0.00.



- 8. Change Facility Code, if applicable.
- 9. Select Exempt Code that describes why tax wasn't paid from the drop down menu.



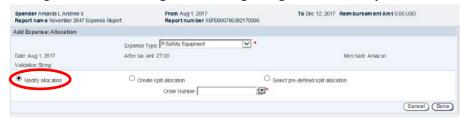
- If sales tax should have been paid but was not, select reason code "XXX-NOT EXEMPT-USE TAX OWED." This code informs the Tax Department to accrue and pay tax.
- 10. Click **TAX INFO** tab, a second time, to exit tax panel.
- 11. Once all tax information is added, allocate expense to the appropriate accounting.

12. Click **Allocation** button to navigate to Allocation pane.

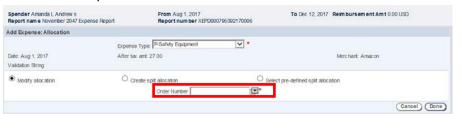


# Step Seven- Allocate Expense to Single Accounting String

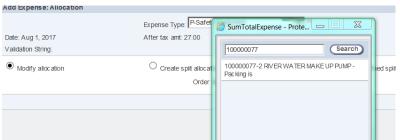
- 1. There are 3 ways to allocate an expense:
- Allocate Single Acct
- Split Allocations
- Add Split Allocation to Preferences
- Pre-Define Split Allocation
- 2. To begin allocation to single accounting string click on Modify Allocation.



3. Click on the drop down arrow next to **Order Number**.



4. Either select the correct order number from the drop down options or type in the order number in the search box and click search.



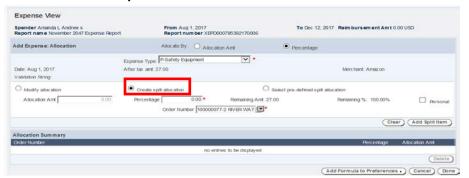
5. Click on the correct options and it will populate in the Order Number field.



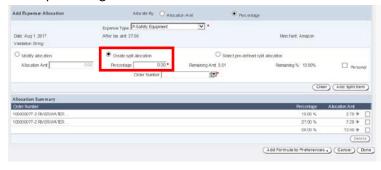
- User can use wild card (\*) to narrow search results. Enter first 2 or 3 digits of account segment (Business Unit, Sub ledger, etc.) and add (\*) then click search.
- If IO number or allocation is unknown reach out to your manager.
- 6. Users have the ability to define and save split allocations to preferences.



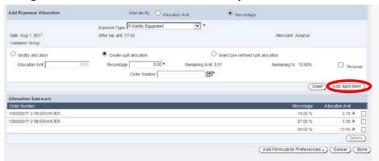
7. Click on the **Create Split Allocation** radial.



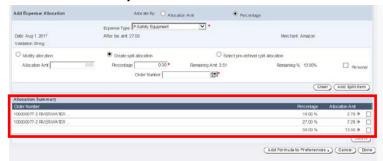
8. Put in the percentage that you want to go to that **Allocation Order Number** in the percentage field.



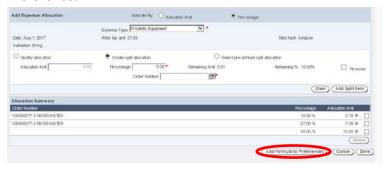
9. Make sure your Order Number is correct for where you want this to be charged to, and then click on the **Add Split Item** button.



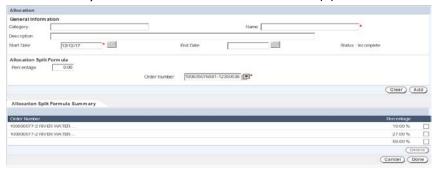
10. This will bring the **percentage** and the **Allocation amount** under the **Allocation Summary**.



11. To Save the formula to your preferences click on **Add Formula to**Preferences.



12. In this screen you will fill out all the fields with a red (\*).



- Name- Name of the Preference
- **Start Date-** When you want this preference to start.
- Order Number-The Order number you want to charge to.

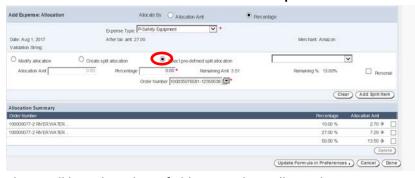
13. Once you have filled in all the required fields, click done.



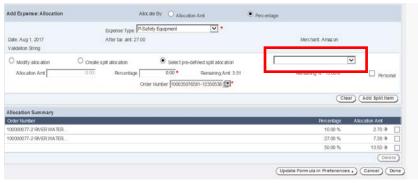
- 14. **Pre-Defined Split Allocation Option** is a saved option that has been saved from a previous report.
- 15. To Delete Split Allocations, click on the box next to the specific split allocation that needs to be deleted.



- 16. Click on the **Delete** Button.
- 17. Click on the radial next to **Select Pre-Defined Split Allocation**.



18. There will be a drop down field option that will populate.

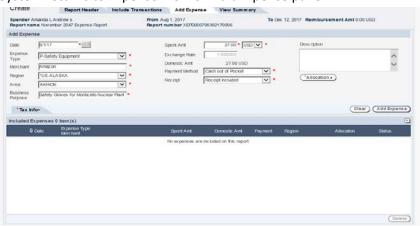


19. Click on the drop down arrow and select one of the pre-defined options to use.

- 20. This will automatically populate the percentages and the order numbers that need to be used.
- 21. After allocating click done.



22. System returns to Expense View on Edit Expense panel.



23. Click the Save Changes button or all your information will be lost.



24. System displays View Summary tab on Edit screen with expense added to Included Expenses section.

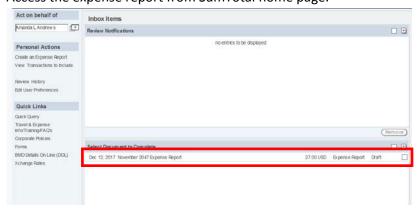


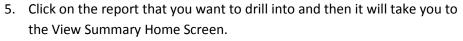
- 25. Hover over the Green Diamond and it will say External Validation Successful.
- The system will perform the accounting validations and display a green icon and hover over message that states "External Validation Successful" at the expense report line level (main expense)
- 26. Click on the Save Report button to save report in draft status.



# **Step Eight- How to Scan and Upload Receipts**

- PII = Personal Identifiable Information- review the receipt if the full credit card number is legible, black it out so that it cannot be seen prior to scanning or if a check is being uploaded to receipts. Black out the banking information at the bottom of the check.
- 2. The PDF image below provides step-by-step instructions on how to login and use the Global Scan feature for the Ricoh devices is located:
- Scanning Receipts
- 3. Copies of receipts are reviewed during audits. Ensure that the receipts are legible and that you upload the correct receipts as these become a permanent record of each expense report.
- 4. Access the expense report from SumTotal home page.







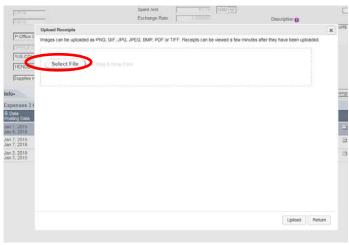
6. Click on the Expense Line.



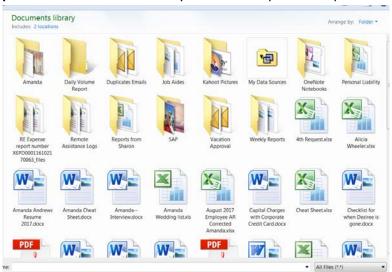
7. Click on Upload Receipts.



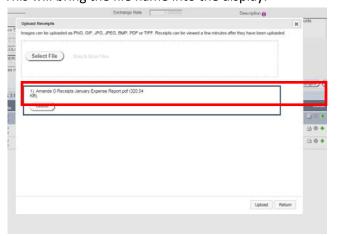
8. Click on Select File.



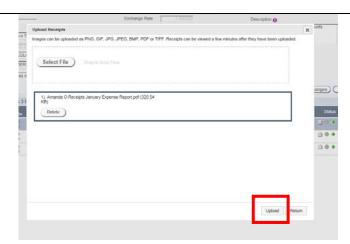
9. Find the document that you have scanned into your documents to upload. Please keep in mind that the system will only allow you to upload 2MB per file. If it's more than that you'll have to split them up.



- If the receipt are coming through blank, prin out the receipt, scan ther receipt to your home folder, and then upload.
- Do not try to upload more than 20 pages at one time, otherwise the user could experience an error.
  - 10. Once the file has been located, click on Open.
  - 11. This will bring the file name into the display.



- User can browse and upload multiple documents by continuing to click Select File and selecting the applicable document to upload.
- Standard upload amount is 20 pages. If more than 20 then break down into two separate scanning groups
- 12. Click Upload.

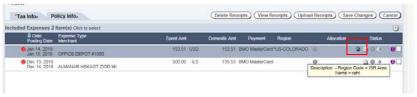


13. User will get a "Successful" page, if the receipts were uploaded correctly:



File uploaded successfully. Receipt can be viewed a few minutes after it has been uploaded.

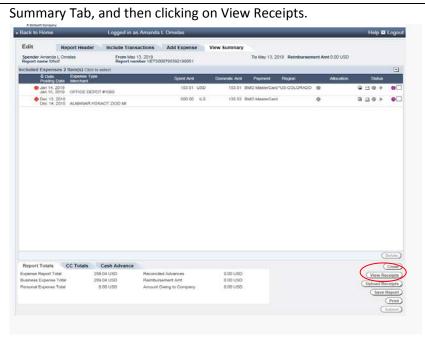
- 14. Click on Return and it will take the user back to the Expense View page.
- 15. This will upload the selected receipts to this specific expense line.



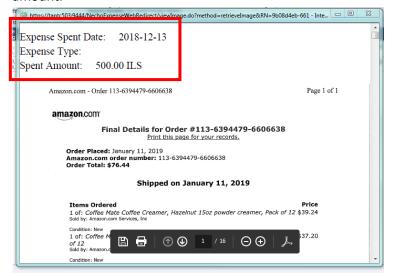
- If unsuccessful the system will advise that the files were not uploaded. Proceed to make the files smaller and upload more than one file.
- 16. Click on View Receipts button to ensure you have attached all required receipts by line.



- It may take up to 5-10 minutes for the file to be viewed. Please wait a few moments and try again.
- The Corporate Expense system will retain all records in accordance with the Corporate Record Retention policy guidelines.
- 17. User can also view receipts on the receipts by clicking on the View

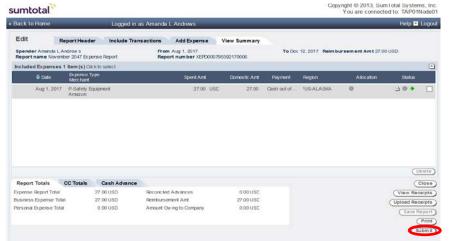


18. In this view, it will put a time stamp on the expense receipt and the amount.



# **Step Nine- Submit Expense Report**

1. After receipts have been successfully scanned and uploaded to expense report, Click **Submit**.



- The system validates the accounting string at the time of Submittal, once again, to ensure the validation is still successful and/or indicates if you have additional transactions.
- Users may receive warnings if there are additional transactions that are ready for inclusion. Select **continue** if you don't want to add more transactions to your current expense report.



2. System will display a Confirmation window.



- 3. Click **OK** and then **Done**.
- 4. Expense report is now submitted for MA Approval (Management Approval).

# **Specific Details**

### **Add Meal Expense Type**

1. Click on down arrow in Expense Type field and Select a Meal expense type (preceded by "M").

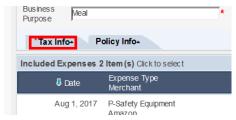


- There are 2 Business Meal Expense Types and 1 Travel Meal Expense Type.
  - Business Meal Employee Only- This expense type is to be used if business cannot be reasonably conducted during regular business hours, and only Xcel Energy Employees are in attendance.
  - Business Meal Non-Employee-This expense type is to be used if business cannot be reasonably conducted during regular business hours and there are guests. (Contractors, Interns, Business Partners, etc.) Even if there is only 1 guest, Business Meal Non-Employee needs to be used.
  - **Travel Meal** Travel Meals are generally for each individual while traveling on company business.
- 2. SumTotal provides the ability to flag an expense based on 10.2 Employee Expense Reimbursement policies.

- 3. The expense will be flagged with a yellow icon to the left of an expense when Expense Type exceeds policy spend/cap:
  - System will flag a meal type expense when total amount of all meals per day expensed by spender exceeds \$65 Daily Meal Allowance.
- 4. Users will enter a business purpose for each expense added to an expense report.
- The Description field can be used for further explanation for expense, if required.
- 5. Enter the Number of Persons that attended the meal.



- Make sure that the number of persons matches how many attendees are listed in the attendee tab (20 attendees and under) or on your uploaded attendee sheet (over 20 attendees).
- System will calculate **Unit Amt**. for each person
- 6. Enter any other required information, if not populated.
- 7. Click on the **Tax Info** Tab.



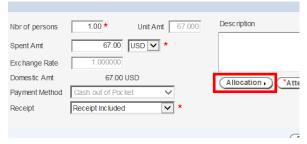
8. Click on Sales Tax Paid drop down arrow and select yes.



9. Click in **Amt. of Sales Tax Paid** field, highlight the zeros and delete. Then enter amount of sales tax.



- 10. Click on TAX INFO tab to close tax screen
- 11. To Allocate Expense Line, user can allocate at the expense level or at the expense line (sub expense) level.
- 12. Click the **Allocation** button to allocate the expense line.



- 13. System displays Add Expense: Allocation on Expense View screen.
- 14. There are 3 ways to allocate an expense: Please see **Step 7** for Allocation instructions.
- 15. When allocation is completed, click **done**.
- 16. System returns to Edit Expense pane on Expense View screen.
- 17. Next, click the Attendee button.



# Add Attendees from Global Xcel Employee List

1. System displays Add Attendees on Expense View screen.



- System defaults user as attendee
- 2. Click Add Attendee.



3. Click on prompt arrow next to blank Attendee name field.

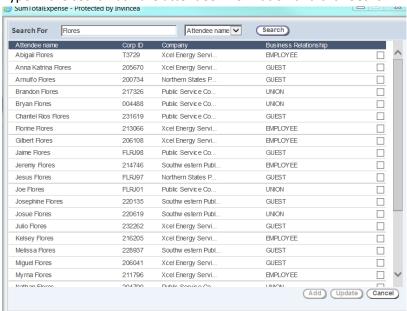


- If your attendee list is 20 and under you must enter them in the attendee
  tab and if your attendee list is over 20, you can upload an attendee sheet
  into your receipts. (If you have multiple meals with attendees over 20,
  please make sure you label the sheet to whatever meal it belongs to so we
  know which list goes with the correct meal.)
- 4. System displays global list of all employees.



- User can search by the Following Criteria:

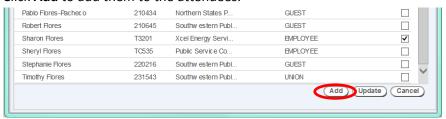
- Attendee Name-Employees Name
- CORP ID-Employees ID
- Company
- Change the Drop Down option to match what you are searching by.
- 5. Type in the search box the attendee information and click **Search**.



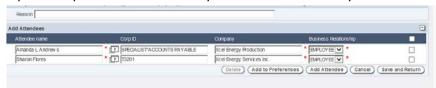
- This will bring up all Employees within that search criteria.
- 6. Select the Attendee by clicking in the check box next to the employee name.



7. Click **Add** to add them to the attendees.



Repeat this process to add as many attendees as necessary.



- All your added attendees will be listed here.

- 8. Click Save and Return once all the attendees have been added.
- 9. To Add Non-Employee Attendees, click on the add Attendee button.



10. Enter in Attendees Name.



11. Enter "XXX" in Corp ID Field.



12. Click Business Relationship drop down arrow and select Guest.



13. In the **Company field** enter the company that they work for.



- 14. Click Save and Return if no Preferences needed.
- 15. Adding Attendees to Preferences creates a preferred list of attendees for easy selection on future expenses.
- 16. Select employee listed under Add Attendees by clicking check box to the right of name(s).



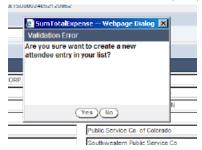
17. Click Add to Preferences.



 You can select all on list by clicking on the check box on header section of screen



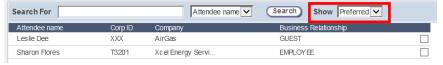
18. System displays pop up window with message "Are you sure you want to create a new attendee entry in your list?"



- 19. Click Yes.
- 20. System saves selected employees to your Attendees-Preferences list.
- 21. Click Save and Return.
- 22. View Preferred Attendees list by Clicking Add Attendee, and Click on prompt arrow next to Attendee Name field.



23. System displays preferred list of all employees added to Preferences by clicking on the drop down arrow next to Show and select **Preferred**.



- 24. Select the Employees and add them to your attendee list.
- 25. Click Save and Return button.

#### **Itemizing Expenses**

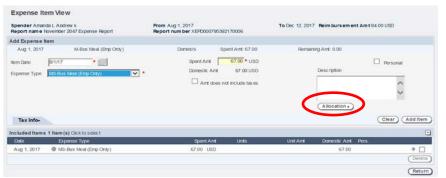
- 1. Users are required to itemize all meal type expense(s).
- 2. Click on the Itemize Button.



- All Meal type expenses require itemization at line item level (sub expense) to identify meal vs. alcohol portion.
  - 3. Xcel Energy must identify meal vs. alcohol portion when applicable and account for expenses appropriately.
  - 4. System displays Add Expense Item on the Expense Item View panel.
  - 5. Spent Amount will display from expense

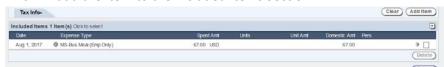


- 6. Click on down arrow in Expense Type field to display a list of Sub Expense types.
- 7. Select the Correct Meal Expense type- Business Meal Employee Only, Non-Employee or Travel Meal.
- 8. If amount is meal only Enter entire amount in Spent Amt. field.
- 9. Click on the Allocation Button.



10. Refer to **Step 7** for Allocation process.

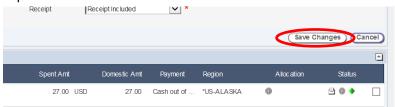
- 11. Once Allocation is complete, click **Add Item**.
- The system displays a "Grey" validation icon with a hover over message stating "Allocations haven't been externally validated" as the sub expenses have not been added to Included Items yet.
  - 12. This will add the item to the Included Items Section.



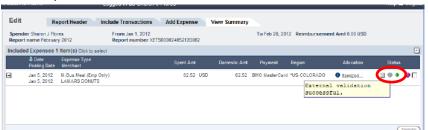
13. Click on the Return Button.



 Click on Save Changes button to save the information added to the expense.



15. If no validation errors occur, the system displays a green icon to the right of the expense line.



16. Click "+" to the left of expense to expand and view sub expense(s).



17. System will display a hover over message that states "External Validation Successful" at the expense report line (sub-expense)





# **Editing/Viewing Attendee Preferences**

1. To access your Attendee preferences, go to your Expenses Home Page.



2. Click on Edit User Preferences.



3. Click on Preferences tab.



- System displays list of attendees added to preferences.
- User can add additional non-employees on this panel.
  - 4. Click Add Attendee button.



- 5. Enter attendee name, title and company
- 6. Select Guest from drop down arrow of Business Relationship field.
- 7. Click Save button



8. To Remove Attendees from the Preference Tab, click on checkbox next to attendee you wish to delete and click **delete**.



- You can select all by clicking on the check box above the list

9. System displays pop up window with message "Delete the selected attendee(s)?"



- 10. Click YES.
- 11. Attendee is removed from Preferences
- 12. Click Save button to save changes.



13. Click Close button to return to SumTotal home page

#### Adding Proxy Submitter's and Approver's

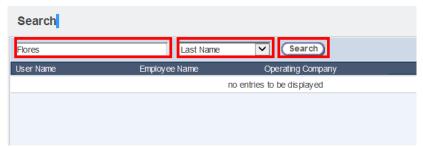
- 1. Proxies are added to create and submit expense reports on behalf of a user.
- To Add a Proxy Submitter, click on the **Proxies** tab under Manage User Profile.



3. Click the prompt arrow next to the Submitter Field.



- 4. System displays list of all active SumTotal Users.
- 5. Search for the employee.
- Easiest way to search is by the employee last name. Type in the employee last name in the search box, click on the drop down arrow, select **Last Name** and then click on **Search**.



6. This will display all employees within that search criteria.



- 7. Click on desired employee to add as Proxy Submitter.
- 8. Selection is added to Proxy Submitter list.



9. Click on the calendar next to the Start Date Field to select Proxy submitter Start Date, which will display in this field once identified.



- Enter End Date if proxy submitter will only be a proxy for a limited time.
- Leave End Date blank if proxy is indefinite.
  - 10. User can have multiple Proxy Submitters.
  - 11. When manager assigns a Proxy Approver, they will include the start and end date for the duration.
  - 12. Expense reports submitted for approval will be sent to the proxy approver only, once one is assigned.
  - 13. To add a proxy approver click on the prompt arrow next to the Approver field.



- 14. Follow same steps for searching for an employee.
- 15. Click on desired employee to add as proxy approver.
- 16. Selection is added to proxy approver.



- 17. Click on calendar to select proxy approver Start Date.
- 18. Enter End Date the proxy approver will no longer need to approve expense reports on your behalf.

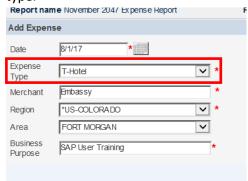


- All expense reports submitted for approval will be sent to the proxy approver: (based on Start and End Date)
- Be sure to always enter End Date for proxy approver. If no End Date is entered all expense reports submitted will continue to be sent to proxy approver until End Date is entered.
- User can have only one proxy approver during a given time

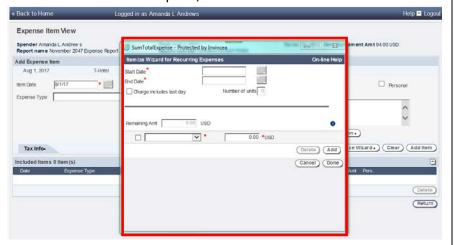


#### **Adding Hotel Expense Allocation and Itemization**

- 1. Expense types which require pre-approval documentation to be obtained and provided with receipts are:
- Spousal Travel
- International Travel
  - 2. Users will enter a business purpose for each expense added to an expense report, and The Description field can be used for further explanation for expense if required.
  - 3. Click on down arrow in Expense Type field and select T-Hotel expense type.

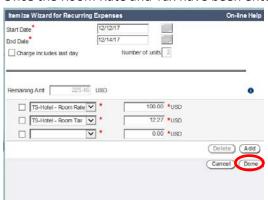


- 4. Enter Business Purpose- Must adequately describe why the expense(s) was incurred.
- 5. Click Allocation button- Refer to **Step 7** for allocation process.
- 6. Once the Allocation is complete, click the **Itemize** button.



- 7. System displays **Itemization Wizard** for Recurring Expenses.
- 8. The Wizard should only be used for reoccurring charges (room rate, taxes, etc.)

9. Enter Start Date (first night) and Enter End Date (last night), by clicking on the calendar next to each field. Item ize Wizard for Recurring Expenses 12/12/17 Start Date 12/15/17 End Date\* Charge includes last day Number of unit System will calculate Number of days 10. Click drop down arrow to select TS-Hotel-Room Rate Sub Expense 0.00 USD Remaining Amt 0.00 \*USD om Rate 🗸 11. Enter the Room Rate Amount and click on add. 100.00 \*USD ☐ TS-Hotel - Room Rate ✓ \* Cancel Done 12. System displays fields for additional items to be selected. ☐ TS-Hotel - Room Rate ✓ \* 100.00 \*USD 12.27 \*USD TS-Hotel - Room Tax 0.00 \*USD 13. Select TS- HOTEL- Room Tax and enter the amount. 100.00 \*USD ☐ TS-Hotel - Room Rate ✓ TS-Hotel - Room Tax 12.27 \*USD 0.00 \*USD 14. Remaining Amt. field will display remaining amount that needs to be itemized, if all is itemized correctly the remaining amount should be 0.00. Remaining Amt USD ☐ TS-Hotel - Room Rate ✓ 100.00 \*USD 12.27 \*USD TS-Hotel - Room Tax 0.00 \*USD Delete Add Hotel must be itemized out by Room Rate and Tax, per day/night of stay.



15. Once the Room Rate and Tax have been entered, click the **done** button.

16. Expense will show itemization by day in the included Items section.



- The system adds a "Grey" validation icon with a hover over message that states "Allocations haven't been externally validated" as the sub expenses have not been saved to "Add Expense" yet.
  - 17. Click Return button
  - 18. Click Save Changes button
  - 19. If no validation errors occur, the system displays a **green icon** to the right of the expense line



- 20. System will display a hover over message that states "External Validation Successful" at the expense report line (sub-expense) level.
- 21. Click Save Report button

#### **Credit Card Transaction Marked Personal**

- 1. Personal use of the corporate card is limited to incidental use only.
- 2. Incidental use is when the personal portion of an expense is **less than** 50 percent of the combined business and personal expense amount.
- 3. If the personal expense is **greater than** the 50 percent of the total expense amount, the Employee should claim the business expense as "cash out of pocket" on an expense statement.
- 4. Personal expenses (e.g., movies, toiletry articles, etc.) are not reimbursable.

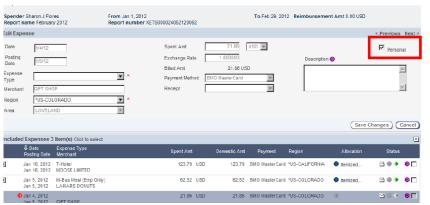
- 5. If an Employee accidentally uses a personal credit card for business travel or business-related expenses, the approving Leader can approve the expense along with the proper supporting original itemized receipt documentation.
- 6. In instances where the Corporate Credit Card is not accepted, the employee should claim the business expense as "cash out of pocket" on the expense report and the approving Leader can approve the expense along with the proper original itemized receipt documentation. A description as to why this happened must be put in the description box; i.e. Company Doesn't accept card, Card machine not working, etc..
- 7. Cash out of pocket expenses are monitored to ensure the Corporate Credit Card is used appropriately.

#### **Indicating Entire Expense Personal**

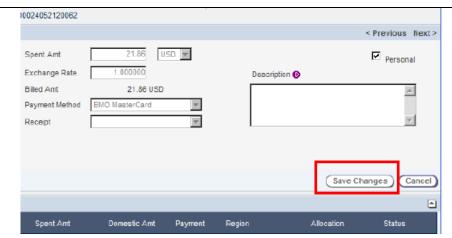
1. From the View Summary Screen, click on the transaction/expense that needs to be marked personal.



- All credit card transactions that have been included on a report will have a
  "Grey" icon and hover over message that states "Allocations haven't been
  externally validated" until the validation has taken place after saving the
  expense line to the expense report
  - 2. Select Personal check box.



- 3. When the personal box has been checked the expense type, business purpose, allocation and Itemize fields are no longer required.
- 4. These do not need to be filled in if the whole transaction will be marked personal.
- 5. Click **Save Changes** button.



- 6. The system returns the user to the **View Summary** screen.
- 7. Expense is added to Included Expenses sections.
- 8. System displays a "Grey" icon with a hover over message stating "Allocations haven't been externally validated".
- The diamond will stay grey when an entire purchase is marked as personal.
  - 9. Click **Save Report** button to save report in Draft status.
  - 10. Amount Owing to Company in Report Totals.



- This is the amount that the employee owes the company.
  - 11. When your report is complete the Amount Owing to Company will be the amount that the user will have to reimburse the company.
  - 12. A check or money order will need to be sent in for the **EXACT** amount along with the follow <u>Amount Owing Xcel Energy Check Submittal</u> Form.
  - 13. The form can also be found by clicking on **Forms** under Quick Links on SumTotal home page.



- 14. This form is required to be completed and sent with check/money order payable to Xcel Energy.
- 15. The object account is the liability account where expenses that are marked as personal in Expense Report are booked to GL. This liability is cleared when check/money order is received and processed by

Customer Receivables. Object Acct field is pre- populated for this reason.

- 16. Enter Operating Co. #. This is the company you reside in.
- 17. 10 = NSP-MN
  - 11 = NSP-WI
  - 12 = PSCO
  - 13 = SPS
  - 50 = XLS
- 18. Click on Print Form button.
- 19. Attached check/money order for amount owed, payable to Xcel Energy.
- 20. Mail completed form with check to Customer Receivables-3115 Centre Point, Roseville, MN 2nd Floor

#### Indicating a portion of Expense as Personal

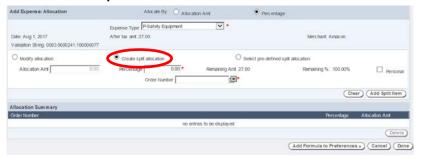
1. Click on the transaction that will have a portion marked personal.



- 2. Enter Expense Type and other required information.
- 3. Click on Allocation button.



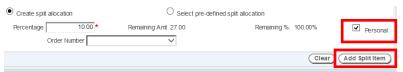
4. Click on Create Split Allocation radio button.



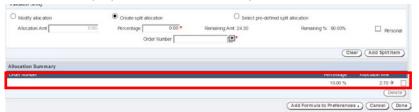
5. Click in the percentage field and do the percentage that is to be marked personal.



6. Click on the Personal check box and then click on the Add Split Item button.



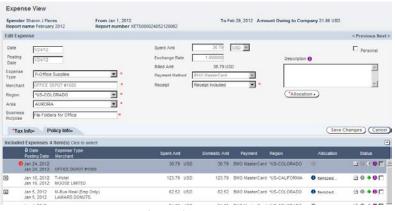
- Once the "Personal" checkbox is selected the system removes the allocation details.
  - 7. Allocations display in Allocation Summary section of screen.



- The system displays personal item with no account element data displayed.
- This item is not associated with a Business Unit cost. There will be no order number, only the percentage and the Allocation Amount will display. The diamond next to the Allocation Amt. should be grey.
  - 8. Click done button.

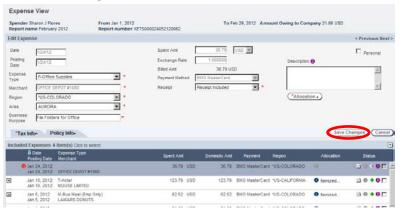


9. System displays Edit Expense on Expense View screen.

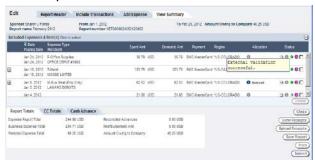


10. Continue with the Tax Info. Refer to Step 6.

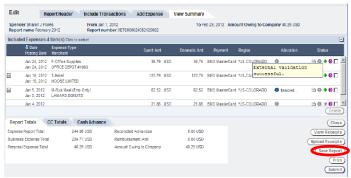
11. Click Save Changes button.



12. Expense is added to the included expenses section in the View Summary Screen.



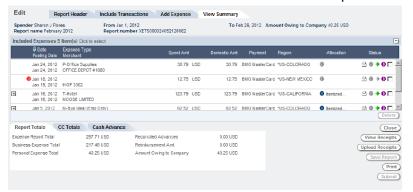
- 13. The system will perform the accounting validations and display a green icon and hover over message that states "External Validation Successful" at the expense report line level (main expense).
- 14. Click **Save Report** button to save report in Draft status.



- Report remains in draft status until submitted for approval.

### Transaction with Expense Line Item (sub-expense) Marked Personal

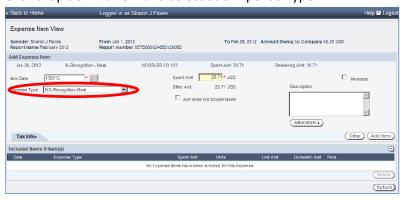
1. Click on transaction added that needs to be itemized as personal.



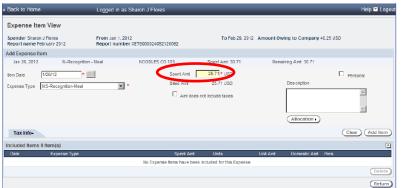
- 2. Select Expense Type that requires itemization (sub-Expenses); (e.g. M-Meal, M- Recognition, etc.).
- 3. Enter required information.
- 4. Click on Attendee button.
- Enter Attendees. Refer to Step Add Attendees from Global Xcel Employee List.
- 6. Click Itemize button.



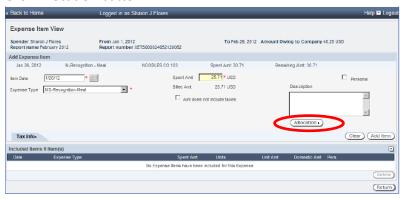
7. Click drop down arrow and select Sub Expense Type.







9. Click Allocation button.



- 10. Refer to **Step 7** for Allocation instructions.
- 11. Click Add Item button



- 12. System saves and displays sub expense in Included Item on the Expense Item View screen.
- 13. Spent Amt. displays with remaining amount to expense.



- 14. Enter Spent Amt. for personal portion remaining.
- 15. Click on Personal checkbox.



- Allocation button is removed
  - 16. Click Add Item.



- 17. System returns to Edit Expense Item pane on Expense Item View screen.
- 18. Expense Item is added to Included Items pane and is marked Personal.



- Check remaining Amt. equals zero when sub expenses are added.
  - 19. Click **Return** button.

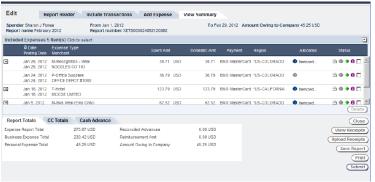


20. Click **Save Changes** button.

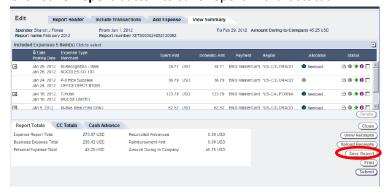


- 21. Expense is added to Included Expenses sections.
- 22. The system will perform the accounting validations and display a

green icon and hover over message that states "External Validation Successful" at the expense report line level (main expense).

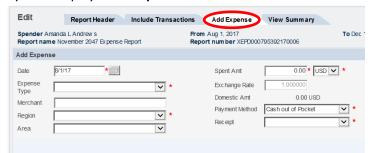


23. Click **Save Report** button to save report in draft status.

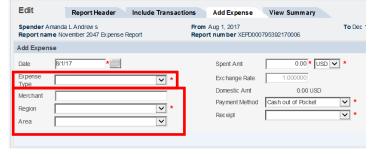


#### **Enter Cash Out of Pocket Expense**

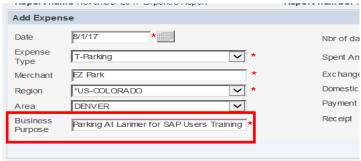
- 1. Per policy, employees are required to use the Corporate Credit card for business related expenses. Cash out of pocket expenses should be limited to mileage reimbursements and other items when card is not accepted or practical (Tips/Tolls, parking meters, etc.).
- 2. Cash out of pocket expenses are entered on Add Expense Tab. All subsequent screens will refer to Add Expense.
- 3. System displays **Add Expense** tab on Edit screen.



- 4. Click on down arrow in Expense Type field and Select the correct expense type.
- 5. Enter Information in all required fields.



6. Enter Business Purpose for the expense.



- 7. Click Allocation button.
- 8. Make sure that the Payment Method is Cash out of Pocket.



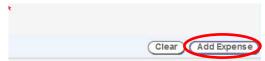
9. Enter in the Spent Amount.



10. The receipt field will always say Receipt Included because All Cash out-of-pocket expenses require an itemized receipt regardless of amount; exceptions include reasonable tips and tolls.



- 11. Click on the **Allocation** Tab. Refer to **Step 7** for the 3 Ways to Allocate.
- 12. Once Allocation is complete, Click **Add Expense** button.



13. System displays Add Expense on Add Expense tab.

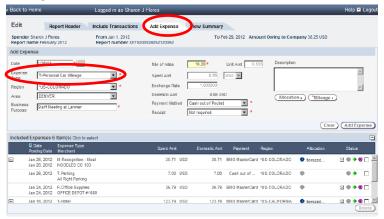
14. Added expense is displayed in Included Expenses section.



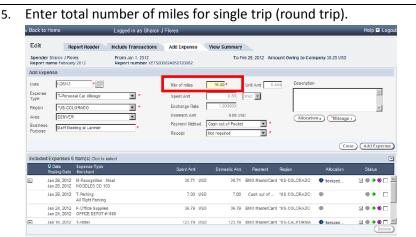
- If no errors occur, system displays green icon (right of the expense line) with hover over message, stating "External Validation Successful".
  - 15. Click **Save Report** button to save report in draft status.

#### Add Mileage expense

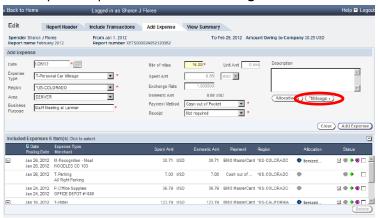
- of personal vehicle for company business. Xcel does not reimburse gasoline as additional expense; gasoline. There are 2 expense types for mileage reimburses; T-Personal Car Mileage This expense type is selected when single round trip (i.e. MDC to 1800 Larimer and back to MDC); T-Multi-Trip Mileage This is used when traveling to multiple locations for business related activities. T-Multi-Trip Mileage requires a Mileage Log be attached as a receipt to substantiate the mileage claimed
- 2. Single Trip mileage.
- 3. From the Add Expense tab select Expense Type (T-Personal Car Mileage).



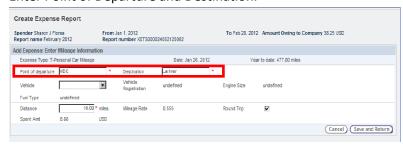
4. Enter Required Information.



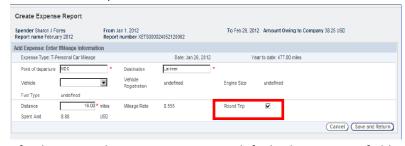
- System calculates the number of miles entered times the mileage rate stored within the system.
  - 6. To complete required data click on Mileage button.



7. Enter Point of Departure and Destination.

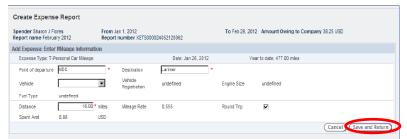


8. Select Round Trip check box.



Number of miles entered in previous screen is defaulted in Distance field.

9. Click on Save and Return button.



- 10. Refer to **Step 7** for Allocation Instructions.
- 11. Click Add Expense button.



- 12. If no errors occur, system displays a green icon (to the right of the expense line). If the user hovers over the "Allocation" the system will display a hover over message that states "External Validation Successful".
- 13. Expense is added to Included Expenses.



- 14. Click Save Report button to save report in draft status.
- 15. Mileage Multi-Trip.
- 16. From the Add expense Tab, select Expense type T-Mileage- Multi-Trip Expense Type.

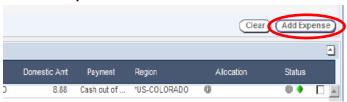


17. Enter Required Information. They will all have red (\*) next to the required information.

18. Enter total number of miles for multi-trip.



- System calculates the number of miles entered times the mileage rate stored within the system.
  - 19. Refer to **Step 7** for Allocation Instructions.
  - 20. Mileage button is not required. The mileage log is required documentation and will be used as the receipt. Scan the mileage log and upload to expense report with all receipts.
  - 21. Click Add Expense.



22. Expense is added to Included Expenses.



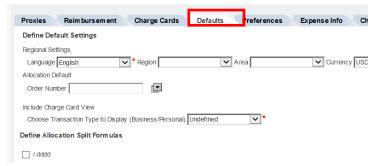
- 23. If no errors occur, the system displays a green icon to the right of the expense line. If the user hovers over the "Allocation" the system will display a hover over message that states "External Validation Successful"
- 24. Click **Save Report** button to save report in draft status.

### **Removing Pre-Defined Allocations**

1. From SumTotal home page, Click on Edit User Preferences link under Personal Actions.



2. Click on **Defaults** tab.



3. Click Delete button.



- 4. System removes defined allocation selected.
- 5. Click Save button.



#### **Review Policy Info Tab**

- 1. SumTotal provides the ability to flag an expense based on <u>10.2</u> <u>Travel and Employee Expense Reimbursement</u>.
- 2. The expense will be flagged with a yellow icon to the left of an expense when Expense Type exceeds policy spend/cap:
- System will flag Life Event expense type when amount per person is greater than \$70.
- System will Flag Holiday/Celebration expense type greater than \$35 dollars per person.
- Other Expense Types are flagged to ensure appropriate use.

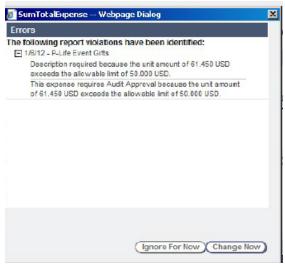
- Other Purchase
- Other Travel
- The System will also flag Meal expenses that are over the \$65 daily meal allowance.
  - 3. All expense reports with flagged expense(s) will be sent for back office audit review. Non-compliance is monitored and reported on a monthly basis.
  - 4. The system will display policy tab on expense which includes policy details of the flagged expense.



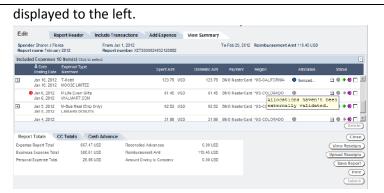
5. The Policy Info tab will explain why the expense is a violation of policy.



6. Once all of the required information has been entered and user clicks on Save Changes. The following message will pop up.



- 7. System displays error regarding policy violations and required action to be taken.
- 8. Description is required Enter explanation of why amount exceeds policy limit
- 9. User has option to either Ignore for Now or Change Now.
- 10. Expense is added to Included Expense section with red icon



- 11. Grey Icon and hover over message Allocations haven't been externally validated.
- 12. Double click on expense to open.
- 13. Enter explanation in the Description box as to why amount exceeded policy limit.



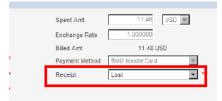
- 14. Click Save Changes button.
- 15. Expense is added to Included Expenses section with yellow icon displayed to the left of expense.



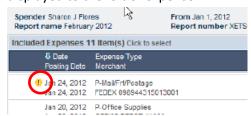
- 16. The system will perform the accounting validations and display a green icon and hover over message that states "External Validation Successful".
- 17. Click Save Report button to save in Draft Status.
- 18. This will still be sent to Audit for Second Approval.

### Lost Receipt

1. Click in Receipt field and in drop down arrow, select Lost.



- 2. Click on Save Changes button.
- 3. System displays View Summary tab.
- 4. Expense is added to Included Expenses section with yellow icon displayed to the left of expense.



- The system will perform the accounting validations and display a green icon and hover over message, stating "External Validation Successful".
- 6. Double click on expense to open.
- 7. Click on **POLICY INFO** tab to review Policy violation message for clarification.



8. POLICY INFO tab opens with message regarding next steps that system will take – expense items submitted with yellow icons will be sent to Audit for second-level review and approval.



- 9. Click on **POLICY INFO** tab to close window.
- 10. Click Save Report to save in draft status.

11. Click **Back to Home** to return to SumTotal Home Page.



12. Click on Forms under Quick Links on SumTotal home page.



- 13. Click on Lost Form link.
- 14. Or it can be found here: Lost Receipt Form.
- 15. Fill out all fields on form.
- 16. Click on Print Form button to PDF the form.
- 17. This form must be signed by spender and approving Manager.
- 18. Scan with other receipts and upload signed version with all receipts.

Docket No. E002/GR-19-564 Exhibit\_\_\_(GJO-1), Schedule 5B Page 59 of 59

Electronic File	http://xpressteams.xcelen	argy com/sc/rafaranca	home/default acry	
Location:	nttp://xpressteams.xceten	ergy.com/sc/reference_	HOHIE/UELAUH.ASDX	
Changes to Procedure:				
<b>Changes to Procedur</b>	re:			
Changes to Procedure  Date of Change	Reason for Change	What Changed?	Updated By:	
		What Changed?		
Date of Change		What Changed?		
	Reason for Change	What Changed?		
Resource Appendix: Post Additional Resource Sample output	Reason for Change	What Changed?		
Resource Appendix: Post Additional Resource	Reason for Change	What Changed?		

**Xcel** Energy

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#### SUPPLYCHAIN

Approving an Expense Report

#### **SUMTOTAL – APPROVING AN EXPENSE REPORT**

This document outlines how an approver of the employee can approve or reject and expense report or an expense item in SumTotal.

### **High Level Process Summary**

Step 1 - Log into SumTotal	2
Step 2 – Review Home Page	3
Step 3 – Open Expense Report	
Step 4 – Open & Review Receipt Packet	8
Step 5 – Review Meal Type Expense	8
Step 6 – Review Purchase Type Expense	13
Step 7 – Review Hotel Type Expense	16
Step 8 – Review Personal Car Mileage (Single round Trip)	18
Step 9 – Review Mileage Multi-Trip	20
Step 10 – Reject an Expense	22
Step 11 - Approving an Expense Report	24

SUPPLYCHAIN

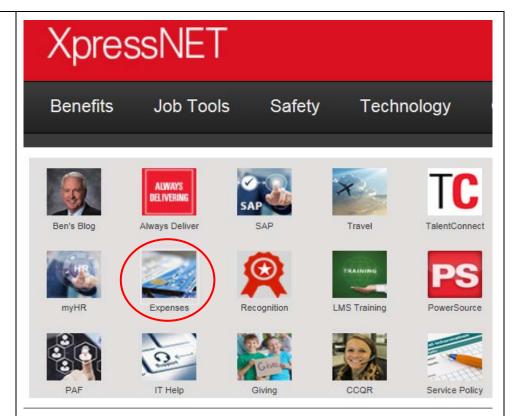
Approving an Expense Report

#### **SUMTOTAL – APPROVING AN EXPENSE REPORT**

#### **Detailed Process**

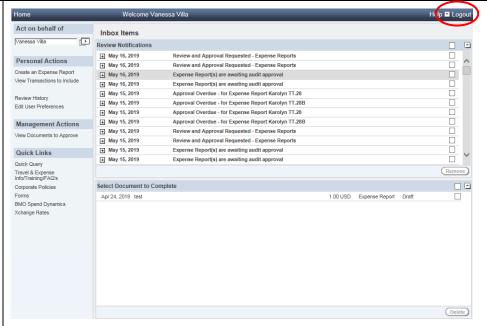
#### Step 1 - Log into SumTotal

- From XpressNet, click on Job Tools from the main menu
- Select Travel and Expenses
- Select Employee Expense
- Select SumTotal (Expense Reporting System)



# System displays **SumTotal** home page

- To Logout of the application, click on Logout link in the top right corner of the screen
- System closes





#### SUPPLYCHAIN

to top

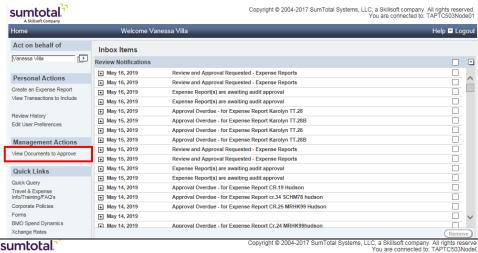
#### Approving an Expense Report

#### Step 2 - Review Home Page

The approver can view the expense report(s)

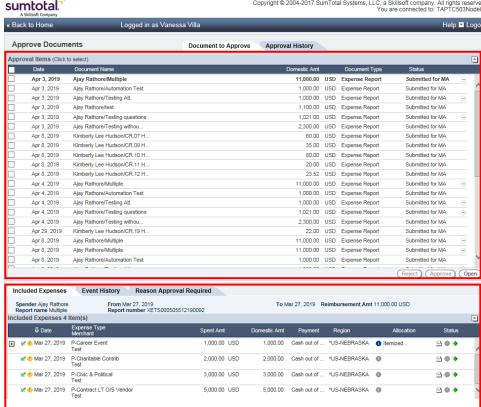
Click the View
 Documents to Approve under Management
 Action list and it will navigate you to all
 Approval Items

Approvers will receive an e-mail notification when an expense report has been submitted for review and approval. This notification is also sent to the inbox on the SumTotal home page. If your email notifications are going to Junk Mail select the link for instructions.



The top section, **Approval Items**, displays a list of expense reports that have been submitted for approval.

The lower section under the **Included Expenses** tab displays a quick view of all expense(s) included in the above selected report.



### **OXCEL**ENORGY\* RESPONSIBLE BY NATURE

#### SUPPLYCHAIN

<u>Back</u>

to top

#### Approving an Expense Report

The expense(s) with the "+" to the left, indicates the expense has been itemized to include expense line items (sub expenses)

Click the "+" to display expense line items

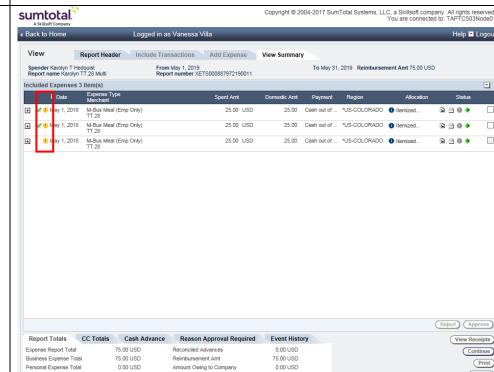


Approver must review all expenses to ensure compliance.

The approver can approve or reject an expense item or the entire report.

**Note:** A yellow icon to the left of expense report indicates expense(s) within the report that have been flagged as nonpolicy compliant. Select policy link to review:

10.2 Travel and Employee Expense Reimbursement



#### SUPPLYCHAIN

Approving an Expense Report



Approvers are required to review all expenses within an expense report to ensure they are appropriate and compliant with the 10.2 Travel and Employee Expense Reimbursement. Once the approver determines if each expense is or is not an appropriate business expense, the approver can approve or reject accordingly.

If an expense is inappropriate or is non-policy compliant the approver will review and decide to approve or reject. Rejected expense(s) will be sent back to the spender (employee) to adjust and/or mark as personal. Expense(s) marked personal will be offset by any cash out of pocket expense(s) in expense report. Any remaining amount will be reimbursed to employee or owed Xcel Energy. Employee must write a personal check/money order payable to Xcel Energy and submit with the Money Owed Xcel form and send to Corporate Card Department - 9500 Interstate 76, Henderson, CO 80640.

The system will display the policy tab indicating which policy details of the flagged expense are non-compliant.

All expense reports with flagged expense(s) will be sent for back office audit review. Non-compliance is monitored and reported on a monthly basis. Personal use of the Corporate Card is limited to incidental expenses only.

Managers will ensure employees follow the guidelines for Personal items on expense reports:

- Incidental use is when the personal portion of an expense is less than 50 percent of the combined business and personal expense amount
- If the personal expense is greater than 50 percent of the total expense amount, the Employee should claim the business expense as cash out of pocket on an expense report
- Personal expenses (e.g., movies, toiletry articles, etc.) are not reimbursable
- If an Employee accidentally uses a personal credit card for business travel or business-related expenses, the approving Leader can approve the expense along with the proper supporting original itemized receipt documentation
- In instances where the corporate credit card is not accepted, the Employee should claim the business expense as cash out of pocket on the expense report and the approving Leader can approve the expense along with the proper original itemized receipt documentation

Cash out of pocket expenses are monitored to ensure the Corporate Credit Card is used appropriately.

Employees are required to reconcile credit card transactions within 30 days from the posting date and Managers must ensure employees are meeting this requirement.

- All Credit card transactions are monitored monthly to ensure timely reconciliation
- Reminder notification is sent to spender 15 days from transaction(s) posting date
- If the transaction(s) remain unreconciled, delinquency notification will be sent to spender and spender's manager on day 46 and every day thereafter until transaction(s) have been reconciled and submitted for approval
- Credit card accounts are suspended at 60 days
- Credit card accounts are closed at 90 days
- If credit card account is closed due to 90 day delinquency, employee will be required to obtain approval from Director of Supply Chain Process Control to apply for new credit card.

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Approving an Expense Report

#### Delinquency is tracked based on the "posting date" of the credit card transaction(s).

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We have 5 different notifications in SumTotal. They are set up as follows:

- Notify Spender: Stale CC Transactions This notification is sent to the spender 15 days after Credit Card transaction(s) posting date. This is a reminder that they have CC transactions that have not yet been added to expense report and that transactions must be added to expense report within 30 days of incurred transaction.
- 2. Notify Spender and Supervisor: Stale CC Transactions This notification is sent to the spender and Level 1 approver 45 days after credit card transaction(s) posting date. This email states that spender has cc transactions over 30 days that have not been added to expense report. They must reconcile and submit expenses within 15 days from the date of first notifications (this notification will be sent daily until transactions are added to expense report.
- 3. **Notify Spender: Document awaiting to be submitted -** This notification is sent to the spender has expense report with credit card transactions that are **45** days from CC Transaction(s) posting date. They must submit expense report within 15 days from the date of the first notification (This notification will be sent daily until expense report is submitted for approval)
- 4. Notify Approver: Document approval is overdue This notification is sent to Approver when they have expense report(s) awaiting their approval for over 15 days (This notification will be sent 15 days from date expense report was submitted for approval and again 15 day later, if not approved within 15 day from 2nd notification expense report will skip to level 2 approver)
- 5. **Notify Approver: Approval level has been skipped** This notifies Level 1 approver that approval has been skipped and expense report has been sent to level 2 approver for approval. This notification is sent 30 days from date expense report was submitted to level 1 for approval

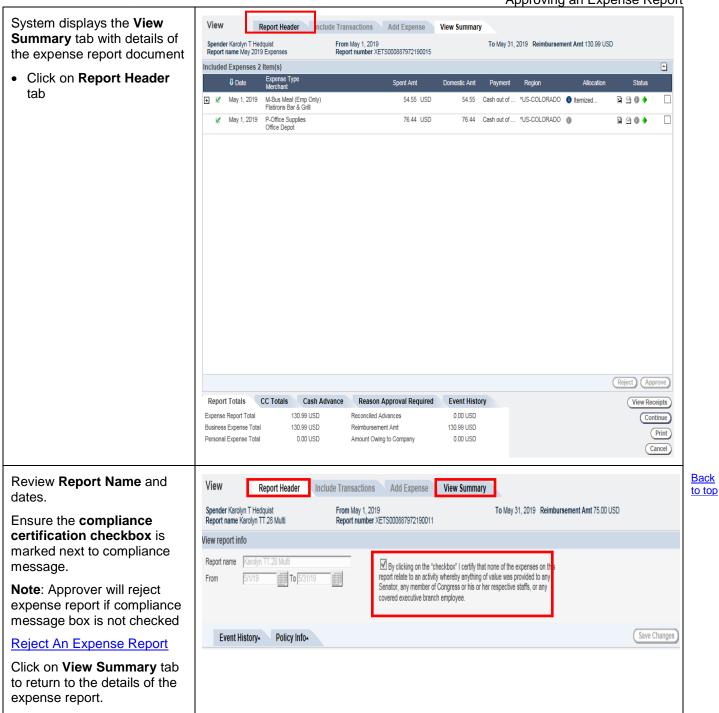
#### Approve Documents Step 3 – Open Expense Document to Approve Approval History Approval Items (Click to select Report Date Document N Apr 8, 2019 11,000.00 USD Expense Report Ajay Rathore/Multiple Submitted for MA Approver will select the 1,000.00 USD Expense Report appropriate expense report. Ajay Rathore/Testing Att. 1.000.00 USD Expense Report Apr 8, 2019 Submitted for MA 1,021.00 USD Expense Report Apr 8, 2019 Ajay Rathore/Testing questions Submitted for MA Ajay Rathore/Testing withou. Apr 8, 2019 2,300.00 USD Expense Report Submitted for MA Click on and highlight the Apr 9, 2019 report Apr 11, 2019 Aiay Rathore/Multiple 11.000.00 USD Expense Report Submitted for MA Apr 11, 2019 Aiay Rathore/Automation Test 1,000.00 USD Expense Report Submitted for MA Karolyn T Hedquist/TEST Apr 12, 2019 0.00 USD Expense Report Submitted for MA Click Open button Kari Ann Moorhouse/Cr.24 MR 280.46 USD Expense Report Apr 29, 2019 Kari Ann Moorhouse/CR.25 MR 564.78 USD Expense Report Submitted for MA Apr 29, 2019 4.42 USD Expense Report Kari Ann Moorhouse/cr.26 MR. Submitted for MA 32.84 USD Expense Report Apr 29, 2019 Kari Ann Moorhouse/cr.29 MR. Submitted for MA Apr 29, 2019 Martin C Schuchard/cr.33 SC. 55.49 USD Expense Report Submitted for MA 340.53 USD Expense Report Apr 29, 2019 Martin C Schuchard/cr.34 SC. Submitted for MA Martin C Schuchard/cr.35 SC Apr 30, 2019 500.00 USD Expense Report Karolyn T Hedguist/Karolyn Submitted for MA May 6, 2019 Karolyn T Hedquist/Karolyn 75.00 USD Expense Report



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Approving an Expense Report





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#### SUPPLYCHAIN

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From the **View Summary** tab a list of expense(s) included in report to be reviewed will be displayed.

## Step 4 – Open & Review Receipt Packet

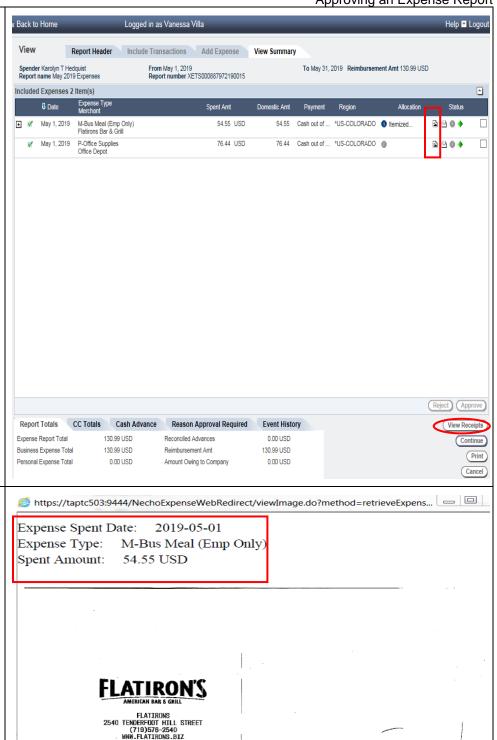
The receipt images will be reviewed and compared to each expense item on report.

To view the full receipt packet:

 Click the View Receipts button (circled in the red)

<u>Or</u> to review the receipt on an individual line item:

 Click the Paper with Folded Corner on each line item (in the red rectangle)



FLATIRONS

(719)576-2540 01/24/2019 17:11:22 pm

The system will display a scanned image of uploaded documentation

At the top of each receipt the Expense Spend Date,
Expense Type and Spent
Amount will appear (this is generated systematically based on the the expense line item)

There could be multiple images make sure to scroll to view all or click on each item to view all receipts

Review and validate appropriate for expense item

Table # 57 Covers 2

Server Time Date 98 12:02:10 PM 01/24/2019



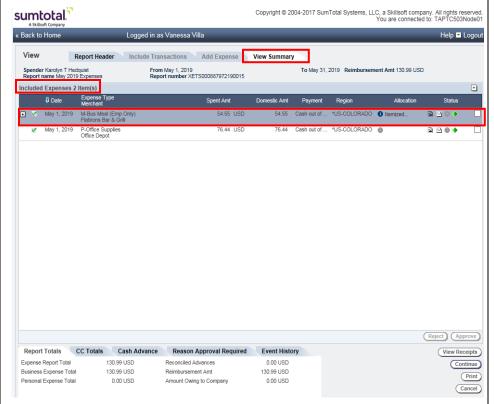
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#### Approving an Expense Report

From the View Summary panel, under the Included Expenses section

 Click on the expense line to open and review



# **Step 5 – Review Meal Type Expense**

Expense types are grouped by "**M**" (Meals), "**P**" (Purchase) and "**T**" (Travel) categories.

- All meal type expenses require itemization at line item level to identify meal vs. alcohol portion
- All meal type expenses require number and list of attendees

Approver reviews the information entered by the Employee. Specific things approver should look at when reviewing **Meal type** expenses include:

- Ensure Expense Type is accurate for expense
- Ensure Business Purpose is adequately documented to clearly describe business reason for expense
- Ensure Number of Persons is correct
- Ensure expense line item(s) is **allocated** to the correct accounting string
- Ensure List of **Attendees** is included
- Ensure meals are itemized and meal vs. alcohol portion identified when applicable
- Ensure tax information is entered as expected
- Ensure expense does not exceed **Daily Meal Allowance per person/per day**

**Note:** The system will flag all meal type expense(s) when total amount exceeds corporate policy.

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## Xcel Energy\*

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Region

Area

Tax Info Event History

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Approving an Expense Report The Expense View screen Expense View displays the expense details To May 31, 2019 Reimbursement Amt 130.99 USD Spender Karolyn T Hedquist Report name May 2019 Expenses From May 1, 2019 Report number XETS000887972190015 under the View Expense View Expense < Previous Next > section Date Description Unit Amt 54.550 Apprentice Training at MDC Spent Amt Review and ensure the Merchant Domestic Amt 54.55 USD above listed items are Region (Allocation ) Attendee Itemize I HENDERSON Payment Method Area entered correctly (i.e. Receipt Expense Type, Business Purpose, Nbr of person View Receipts Reject Approve Done Tax Info etc.) Included Expenses 2 Item(s) Date 54.55 USD 54.55 Cash out of ... \*US-COLORADO 1 Itemized B 9 0 • 76.44 USD 76.44 Cash out of ... \*US-COLORADO (I) May 1, 2019 P-Office Supplies Office Depot □ □ □ • · Review and ensure **Expense View** Expense Type selected is Spender Karolyn T Hedquist Report name May 2019 Expenses From May 1, 2019 Report number XETS000887972190015 To May 31, 2019 Reimbursement Amt 130.99 USD accurate for expense View Expense < Previous Next > Review Business Description Unit Amt 54.55 Nbr of persons Purpose to ensure it Apprentice Training at MDC USD 🗸 Туре provides and adequately Exchange Rate documents the business ٧ Domestic Amt 54.55 USD Allocation > Attendee I Itemize reason for the expense Payment Method Cash out of Pocket Area Edit Comment > Review and ensure Number of persons is View Receipts Tax Info. Event History. Reject ) ( Approve ) ( Done accurate Included Expenses 2 Item(s) □ Date • Spent Amt, if a receipt is Spent Amt Status required, verify that the + May 1, 2019 M-Bus Meal (Emp Only) 54.55 USD 54.55 Cash out of ... \*US-COLORADO (1) Itemized... □ □ 0 ◆ report amount equals the 76.44 USD 76.44 Cash out of ... \*US-COLORADO (1) itemized receipt amount Meals less that \$25.00 do not require a receipt and the field must be changed • View Receipt, if a receipt to show Not Required. is required, you need to verify that the receipt(s) matches all of the expense submitted Click on **Allocation** button Expense View to review accounting Spender Karolyn T Hedquist Report name May 2019 Expenses From May 1, 2019 Report number XETS000887972190015 allocation(s) are correct View Expense < Previous Next > Nbr of persons Unit Amt 54.550 Description Apprentice Training at MDC Expense USD 🗸 M-Bus Meal (Emp Only) Spent Amt Exchange Rate

Domestic Amt

Payment Method Cash out of Pocket

54.55 USD

Allocation • Attendee • Itemize •

View Receipts Reject Approve Done

Edit Comment >

#### SUPPLYCHAIN

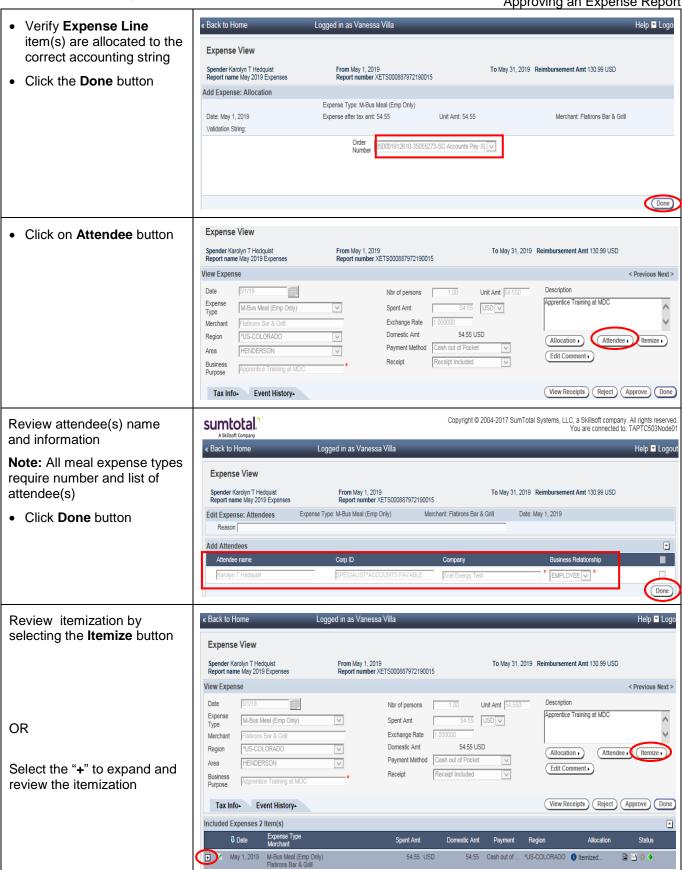
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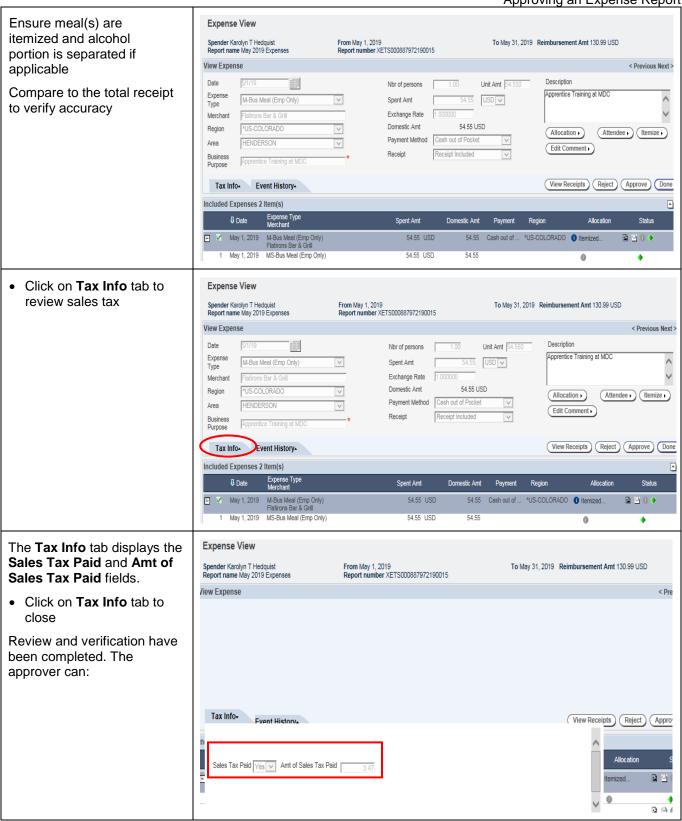


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## Xcel Energy\*

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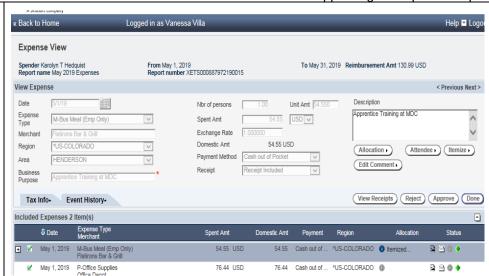
 Repeat steps to continue reviewing additional expense items

OR

 Approve An Expense Report

OR

Reject An Expense Report



## Step 6 – Review Purchase Type Expense

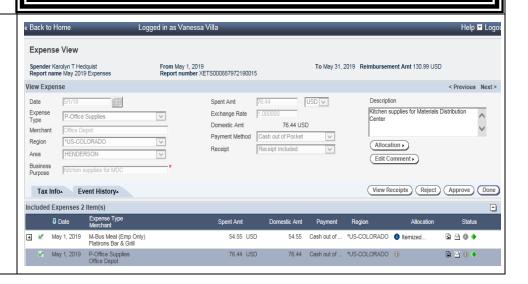
Expense Types are grouped by "**M**" (Meals), "**P**" (Purchase) and "**T**" (Travel) categories.

Approver reviews the information entered by the Employee. Specific things approvers should look at when reviewing **Purchase Type** expenses include:

- Ensure Expense Type is accurate for expense
- Ensure Business Purpose is adequately documented to clearly describe business reason for expense
- Expense Line item(s) are allocated to the correct accounting string
- Ensure List of Attendees is included, if applicable
- Purchase expense types that require number and list of attendees/recipients include:
  - P-Recognition-Entertainment
  - o P-Recognition-Safety
  - o P-Recognition-Gifts
  - P-Entertainment-Tickets
  - P-Life Event-Gifts
- Ensure tax information is entered as expected
- · Ensure correct Facility Code is selected

The Expense View screen displays the expense details under the View Expenses section

 Review and ensure the above listed items are entered correctly (i.e. Expense Type, Business Purpose, Nbr of person etc.)

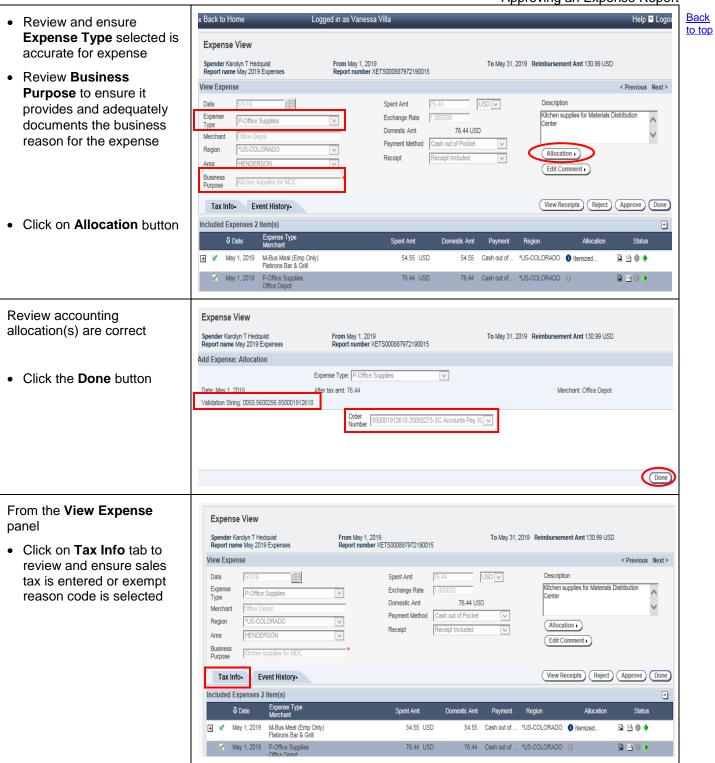


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### Approving an Expense Report



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The Tax Info tab displays the Sales Tax Paid and Amt of Sales Tax Paid fields.

Review and ensure Sales Tax Paid is Yes and Amt of Sales Tax Paid is entered

If Sales Tax Paid field is marked No and amount is zero, check to ensure correct exempt code was selected.

If tax is owed, but was not charged; ensure the exempt code XXX-NOT EXEMPT-**USE TAX OWED** has been selected. This code informs the tax department to accrue and pay the tax to the appropriate taxing authorities.

- · Check and ensure appropriate Facility Code is selected
- Click on Tax Info tab to close window

Review and verification have been completed. The approver can:

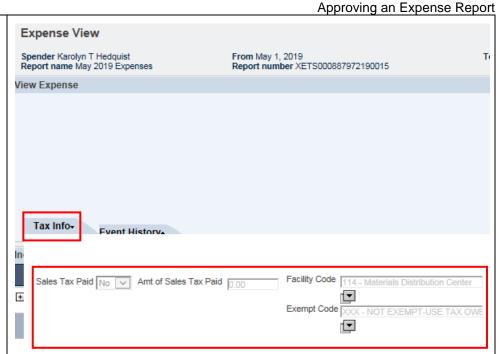
 Repeat steps to continue reviewing additional expense items

OR

Approve An Expense Report

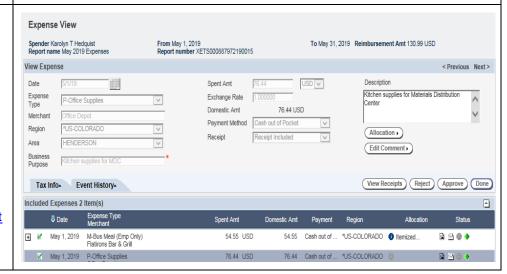
OR

• Reject An Expense Report



Facility Code defaults the facility from user's profile. Facility Code is used to identify where we took possession of item(s) purchased.

Ensure appropriate facility code is entered for where material was shipped/used



#### SUPPLYCHAIN

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Approving an Expense Report

## Xcel Energy\*

## Step 7 – Review Hotel Type Expense

Expense Types are grouped by "**M**" (Meals), "**P**" (Purchase) and "**T**" (Travel) categories.

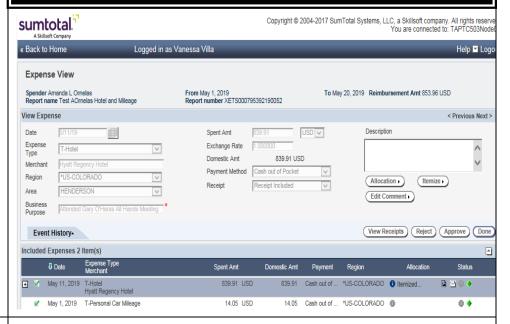
Approver reviews the information entered by the Employee. Specific things approver should look at when reviewing **Hotel** type expenses include:

- Ensure Expense Type is accurate for expense
- Ensure Business purpose is adequately documented to clearly describe business reason for expense
- Ensure expense line item(s) are allocated to the correct accounting string
- Ensure Hotel expense is itemized to break out room rate, room tax for each night and any other expense included on hotel receipt.
- Ensure tax information is entered as expected
- Ensure expense meets Xcel's policy guidelines

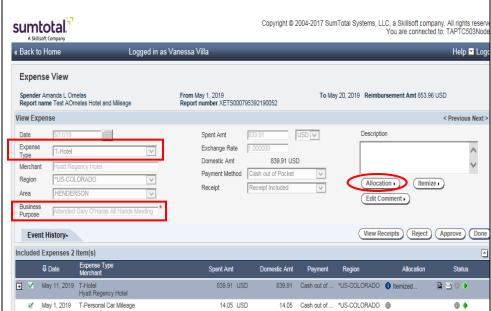
System will flag Hotel expense type when room rate greater than the corporate policy per night

The Expense View screen displays the expense details under the View Expenses section

 Review and ensure the above listed items are entered correctly (i.e. Expense Type, Business Purpose, etc.)



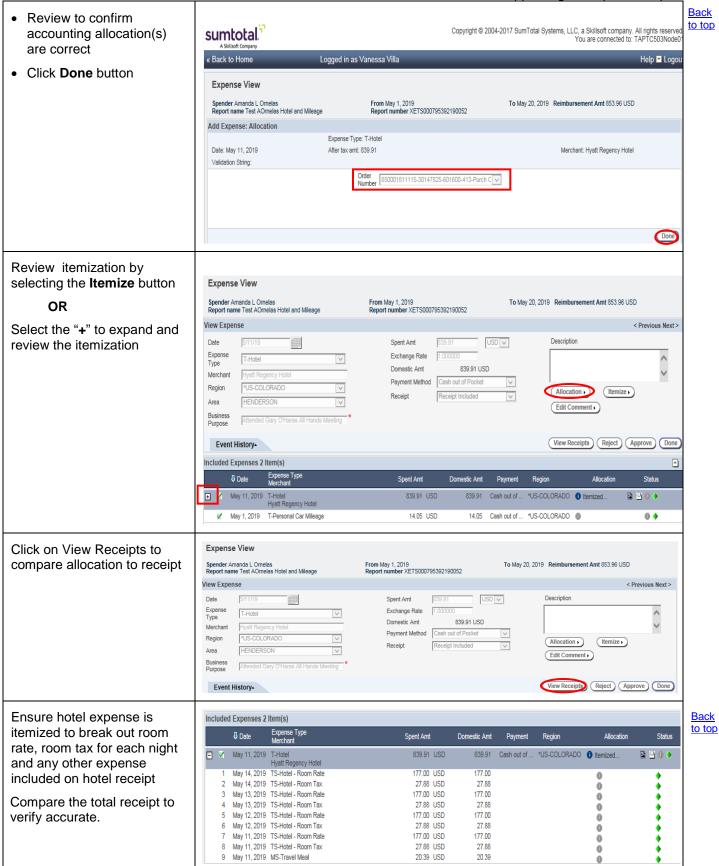
- Review and ensure Expense Type selected is accurate for expense
- Review Business
   Purpose to ensure it provides and adequately documents the business reason for the expense
- Click on Allocation button



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### Approving an Expense Report



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Xcel Energy<sup>e</sup>

Approving an Expense Report

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View Expense screen displays

Once review and verification have been completed, the approver can:

 Repeat steps to continue reviewing additional expense items

#### OR

Approve An Expense Report

#### OR

Reject An Expense Report



### Step 8 – Review Personal Car Mileage (Single round Trip)

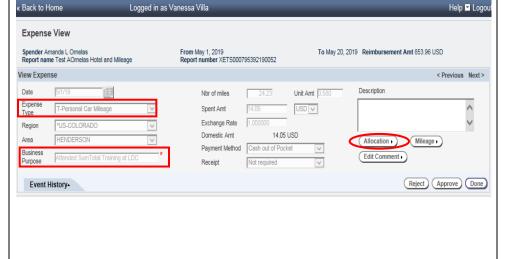
Per Policy Xcel Energy only reimburses mileage for use of personal vehicle for company business. Xcel Energy does not reimburse gasoline as additional expense.

The required documentation (Departure/Destination and number of miles) is entered in system for Personal Car Mileage

- · Review and ensure **Expense Type T-**Personal Car Mileage is selected for expense
- Review Business Purpose to ensure it provides and adequately documents the business reason for the expense
- Click on Allocation button

## There are 2 expense types for mileage reimbursements

- o T-Personal Car Mileage This expense type is selected when there is a single round trip (i.e. MDC to 1800 Larimer and back to MDC)
- o T-Multi-Trip Mileage This is used when traveling to multiple locations for business related activities. T-Multi-Trip Mileage requires a mileage log to be attached to the expense report.



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Approving an Expense Report

Review to confirm « Back to Home Logged in as Vanessa Villa accounting allocation(s) **Expense View** are correct Spender Amanda L Ornelas Report name Test AOrnelas Hotel and Mileage From May 1, 2019 Report number XETS000795392190052 To May 20, 2019 Reimbursement Amt 853.96 USD Click Done Add Expense: Allocation Expense Type: T-Personal Car Mileage Date: May 1, 2019 After tax amt: 14.05 Merchant: Validation String: 0050.5600206.850001811115 Order Number | 8500018111115-30147825-601600-413-Purch C | V Done Logged in as Vanessa Villa Click on Mileage button « Back to Home Help 🗹 Logoi **Expense View** Spender Amanda L Ornelas Report name Test AOrnelas Hotel and Mileage From May 1, 2019 Report number XETS000795392190052 To May 20, 2019 Reimbursement Amt 853,96 USD View Expense < Previous Next > Date Description Nbr of miles Unit Amt 0.58 Expense Spent Amt Exchange Rate Region **V** V Area Allocation Mileage ) Payment Method Cash out of Pocket Business Edit Comment > Purpose Event History-Reject Approve Done Review and ensure correct « Back to Home Logged in as Vanessa Villa Help 
Logou Point of Departure and **Destination** are entered Create Expense Report Review number of miles Spender Amanda L Ornelas From May 1, 2019 To May 20, 2019 Reimbursement Amt 853.96 USD are entered accurately Report name Test AOrnelas Hotel and Mileage Report number XETS000795392190052 Edit Expense: Enter Mileage Information • Click Save and Return Expense Type: T-Personal Car Mileage Date: May 1, 2019 Year to date: 24.23 miles button to return to Point of departure MDC- Material Distribution Destination **Expense View** Vehicle Vehicle undefined Engine Size undefined Registration Personal Mileage (single trip) Fuel Type undefined expense does not require Distance 4.23 miles Mileage Rate 0.580 Round Trip **√** receipts as all documentation Spent Amt 14.05 USD is entered in the Mileage button Save and Retu

accounting allocation(s)

are correct

Click Done

■ Date

May 1, 2019 T-Mileage-Multi-Ti

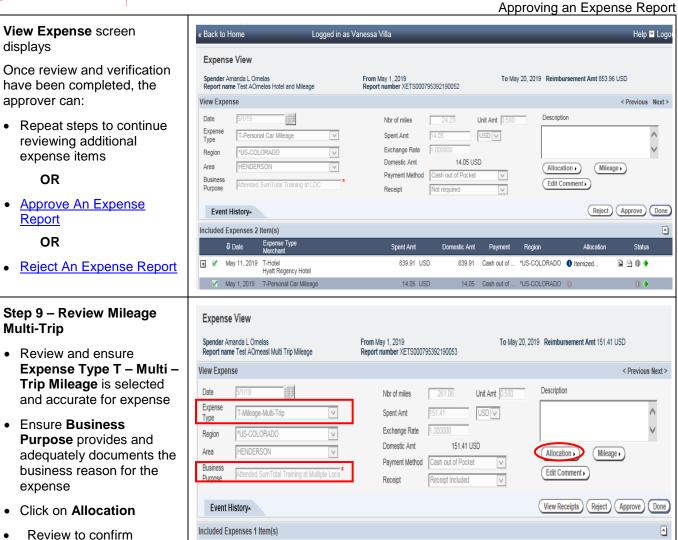
SUPPLYCHAIN

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Spent Amt

151.41 USD

Domestic Amt

Payment

151.41 Cash out of ... \*US-COLORADO

Status

□ □ 0 ◆



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**Mileage** button is not required for multi trip; instead the mileage log is used as the required documentation

Employee must scan the mileage log and upload to the expense report

Expense View screen displays

Review and verification have been completed. The approver can:

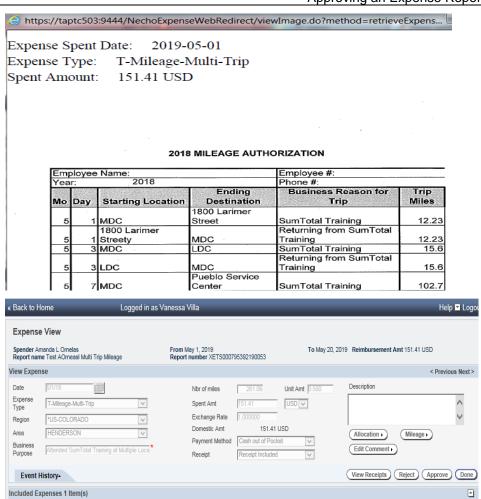
 Repeat steps to continue reviewing additional expense items

#### OR

 Approve An Expense Report

#### OR

Reject An Expense Report



Spent Amt



#### SUPPLYCHAIN

### Approving an Expense Report

# Step 10 – Reject an Expense

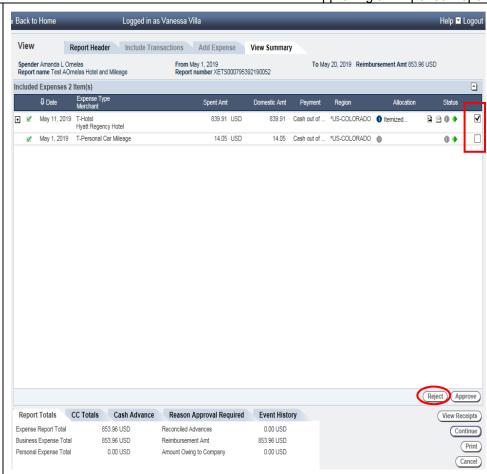
Approvers have the ability to reject a single expense or all expenses on an expense report.

If expense is non-compliant the approver must either:

 Approve the expense report/item knowing that it is non-compliant

#### OR

 Select the item(s) to reject and click Reject

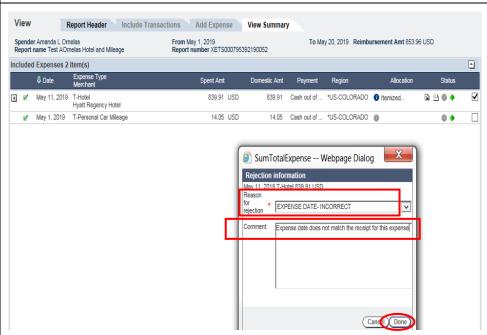


## The **Rejection Information** box displays

- Click on drop down arrow and select correct Reason for rejection code
- Enter information in Comment section

Make sure to include enough information to allow the spender to make corrections and resubmit the expense.

Click **Done** button

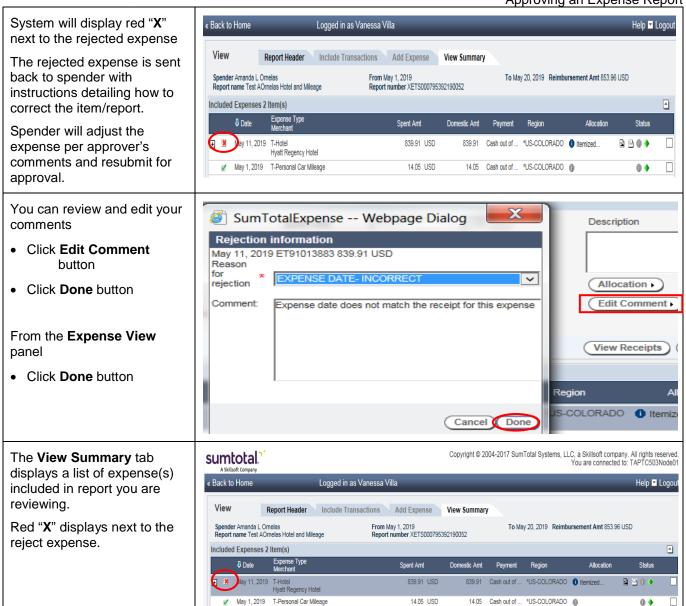


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#### SUPPLYCHAIN

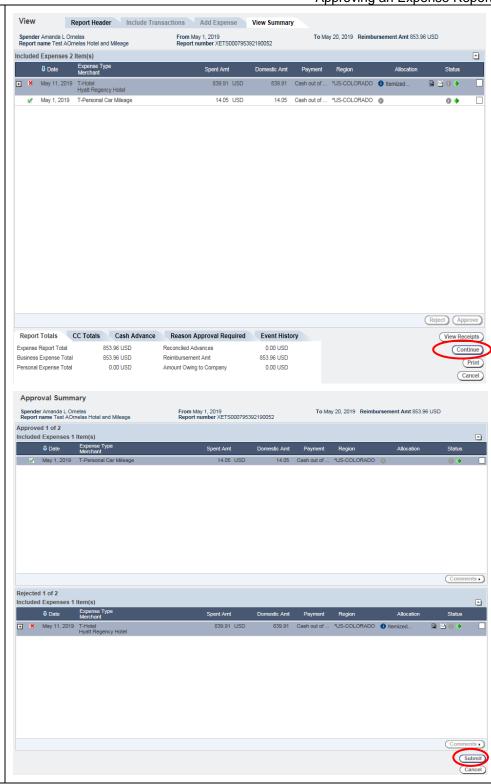
### Approving an Expense Report

# Step 11 - Approving an Expense Report

After the review and validation process is completed:

- Click the **X** on the receipt viewer to close
- Click Continue button
- Click Submit to save the report in Approval
   Complete status

The expense report will be retained in the Corporate Expense system in accordance with the Record Retention policy.





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### Approving an Expense Report

The system will navigate to the **Document to Approve** tab on the **Approve Documents** panel

Click the **Approval History** tab



Approval History displays all reports and status of approver action (approval complete, rejected or partially approved, Submitted for MA, Submitted for Audit)

The expense report will be retained in the Corporate Expense System in accordance with the Record Retention policy

Sort by **Status** to review. Status options include: Approved, Rejected or Partially Approved.



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#### **Employee Expense Budget and Actual**

#### Table I – Employee Expense State of Minnesota Electric Jurisdiction

(\$ 000's)	2016	2017	2018	2019	2020	2020	2020	2021	2021	2021	2022	2022	2022
	Actual	Actual	Actual	Forecast	Budget	TY Adj	Test Year	Plan Year	Plan Yean	Plan Year	Plan Year	Plan Year	Plan Year
								Budget	TY Adj	Test Year	Budget	TY Adj	Test Year
Travel Expense	4,174	3,579	4,062	3,864	4,329	(236)	4,092	4,397	(239)	4,158	4,391	(231)	4,160
Lodging Expense	2,032	2,058	2,402	1,930	1,835	(158)	1,677	1,845	(160)	1,684	1,841	(155)	1,686
Meals Expense	1,049	1,742	2,088	1,495	1,319	(737)	581	1,313	(747)	566	1,320	(722)	598
Misc. Travel Expense (1)	4,368	4,033	4,166	4,196	4,522	(212)	4,310	4,689	(215)	4,475	4,169	(208)	3,962
Travel Expense Subtotal	11,623	11,412	12,719	11,485	12,005	(1,344)	10,661	12,244	(1,361)	10,882	11,722	(1,316)	10,406
Dues & Memberships	673	551	431	797	951	(33)	918	930	(33)	897	892	(32)	860
Gifts & Recognition	987	934	1,058	1,428	1,124	(64)	1,060	1,109	(65)	1,044	1,144	(63)	1,081
Board of Directors	954	1,025	1,048	1,110	1,298	(45)	1,253	1,298	(46)	1,252	1,298	(44)	1,254
Total	14,237	13,922	15,256	14,819	15,378	(1,486)	13,892	15,580	(1,505)	14,075	15,056	(1,455)	13,601

<sup>1.</sup> Changes are driven largely by employee relocation expenses and per diem expenses. This category also includes conference expenses.

### Table II – Employee Expense Actual vs. Budget Comparisons State of Minnesota Electric Jurisdiction

(\$ 000's)	2016	2016	2016	2017	2017	2017	2018	2018	2018	2019	2019	2019
	Actual	Adjusted	Variance	Actual	Adjusted	Adjusted	Actual	Adjusted	Adjusted	Forecast	Budget	Variance
		Budget			Budget	Variance		Budget	Variance			
Travel Expense	4,174	4,421	-248	3,579	4,203	-624	4,062	3,348	714	3,864	4,207	-343
Lodging Expense	2,032	1,903	129	2,058	1,761	297	2,402	1,860	542	1,930	1,819	111
Meals Expense	1,049	901	148	1,742	727	1,015	2,088	790	1,298	1,495	1,206	289
Misc. Travel Expense (1)	4,368	5,405	-1,037	4,033	4,592	-560	4,166	4,026	140	4,196	5,376	-1,180
Travel Expense Subtotal	11,623	12,630	-1,007	11,412	11,283	129	12,719	10,024	2,695	11,485	12,608	-1,123
Dues & Memberships	673	582	91	551	662	-111	431	605	-174	797	897	-100
Gifts & Recognition	987	939	48	934	679	255	1,058	1,248	-190	1,428	1,136	291
Board of Directors	954	889	64	1,025	902	122	1,048	1,008	40	1,110	972	138
Total	14,237	15,041	-804	13,922	13,527	395	15,256	12,884	2,372	14,819	15,613	-794

- 1. Changes are driven largely by employee relocation expenses and per diem expenses. This category also includes conference expenses.
- 2. Adjusted budget means the employee expense amount minus the employee expense adjustment as was proposed by Xcel Energy in our previous rate case Docket No. E002/GR-15-826.

Northern States Power Company
List of EER Schedules

## Docket No. E002/GR-19-564 Exhibit\_\_\_(GJO-1), Schedule 7 Page 1 of 2

EER - Schedule 1	Travel Expenses
EER - Schedule 1A	VP and Above
EER - Schedule 2	Meal Expenses
EER - Schedule 3	Entertainment Expenses
EER - Schedule 4	Board of Directors Compensation and Expenses
EER - Schedule 5	Top Ten Compensation
EER - Schedule 5A	Top Ten Expenses - Benjamin G. Fowke III
EER - Schedule 5B	Top Ten Expenses - Brett C. Carter Sr.
EER – Schedule 5C	Top Ten Expenses - Robert Frenzel
EER - Schedule 5D	Top Ten Expenses - Kent T. Larson
EER - Schedule 5E	Top Ten Expenses - Scott M. Wilensky
EER - Schedule 5F	Top Ten Expenses - Timothy J. O'Connor
EER - Schedule 5G	Top Ten Expenses - Darla Figoli
EER - Schedule 5H	Top Ten Expenses - David L. Eves
EER - Schedule 5I	Top Ten Expenses - Judy M. Poferl
EER - Schedule 5J	Top Ten Expenses - Christopher B. Clark
EER - Schedule 6	Dues
EER - Schedule 7	Gifts
EER - Schedule 8	Aviation
EER - Schedule 9	Lobbying
EER - Schedule 10	SAP-VIM and Corporate PassPort Transactions
EER - Schedule 11	SAP-VIM Nuclear and Nuclear PassPort Transactions
EER - Schedule 12	TIME Transactions

Northern States Power Company
List of EER Schedules

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EER - Summary Report 1	2020 Test Year
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EER - Summary Report 2 2021 Plan Year

EER - Summary Report 3 2022 Plan Year

## Employee Expense Reporting Report Preparation, Rate Case Adjustment Summary, and Analysis Overview

This schedule describes the detailed steps taken to develop the EER Schedules, and the efforts taken by the Company to analyze and review transactions processed within SumTotal, PassPort, Vendor Invoice Management (VIM) and TIME in order to provide a summary of employee expenses found in those technical systems. The Company's proposed test year adjustment for employee expenses is also summarized in this schedule.

### Creation of EER Schedules

The Company took the following steps to create the EER Schedules provided in Volume 3, Required Information, Section IV Other Required Information, Tab 2.

- 1. The Supply Chain organization provided employee expense information for 2018 corporate credit card transactions, as well as reimbursements for other expenses, such as mileage, that were processed within the Company's primary expense reporting system, SumTotal. The data included transactions that were incurred by employees of the 1) Xcel Energy Service Company (XES), and 2) the Northern States Power Minnesota Operating Company (NSPM). The raw data file contained the transaction lines assigned to employee-related expense accounts that were required in the analysis. While SumTotal has many fields, only those fields that would (1) determine whether the transaction was allocable to Minnesota electric ratepayers, and (2) determine whether the transaction was within the scope of the Employee Expense Statute were included.
- 2. Transactions were sorted based on the Company's accounting general ledger "Systems, Applications and Products in Data Processing" (SAP) software's "Internal Order" account field to limit the size of the raw data set to be analyzed to approximately 274,000 transactions by including only those costs that were either direct assigned, or that were allocated in part as operating expense to the NSPM Operating Company. Specifically, transactions assigned to Company Code "10" (NSPM) and Company Code "50" (XES) were retained due to the likelihood the entire transaction cost, or a portion of the cost, could be allocated to NSPM. All other transactions, directly assigned to other Xcel Energy legal entities, were eliminated as being outside of the scope of analysis related to rate cases and reporting required for jurisdictions residing within NSPM.
- 3. Several columns were added to facilitate analysis of the data and creation of the EER Reports. Examples of these analysis fields include: "EER Summary Cost Element" (Employee Expense Report), "EER Report #", "File Line Ref. #", "Required EER Report Transaction", "Year", "International Travel", "Above / Below the Line", "Board of Directors", "VP & Above", "Employee's Company", "Compensation Level", "Ten Highest Paid Employees", "Executive + Assistant's Transactions", "Executive / Assistant", "Key Word Search", "Keyword", "Vague Business Purpose Desc.", "Meals > \$65 per Attendee", "Life Events", "Business Meals Employee Only", "Flagged Transaction", and "Rate Case Adj. Transaction".
- 4. Data fields (columns) were also added to the file to manually calculate the amount of each transaction's total that was allocated to the NSPM Company, NSPM Company Electric Utility and to the State of Minnesota Electric Retail jurisdiction. The allocations were derived by matching the accounting used for the SumTotal transaction against tables of the Company's SAP general ledger accounting system data and then assigning the

- associated allocation factors through the use of Microsoft Excel VLookup functions. The analysis was then restricted to approximately 201,000 transactions which ultimately allocated above-the-line expense to the State of Minnesota Electric Retail jurisdiction, or as a below-the-line expense to the NSPM Company.
- 5. Of this data set, the Company's employees who were Vice Presidents and above and their executive assistants during 2018 were identified.
- 6. Employee expense transactions for our employees with a title of Vice President, or higher were identified. For each transaction of a Vice President or higher employee title, the field "VP & Above" was populated as "Yes". This field was coded as "No" for other employees' transactions. The "Executive / Assistant" field was then populated as "Executive" for executive (having a title of Vice President, or higher) employees' transactions.
- 7. The executives' Executive Assistants' transactions were identified and coded with their respective executive's name within the "Executive + Assistant's Transactions" field. The "Executive / Assistant" field was then populated as "Executive Assistant" for the Executive Assistants' transactions. The other employees' transactions were populated as "No".
- 8. Transactions of the ten highest compensated employees were identified. These transactions were coded with the employee's full name within the "EER Report #'s (5A 5J) Ten Highest Paid Employees" field. This field was left blank for other employees' transactions.
- 9. Transactions of the top (ten) highest compensated employees were identified as "Ten Highest Paid Employees" within the "Compensation Level" field. Other employees' transactions were labeled as "Not in 10 Highest Paid Group" within this field.
- 10. Xcel Energy Board of Director-related transactions were identified through the SAP "Internal Order" account field. Transactions coded to "850000043036 CSES Board of Director 114" were identified to be Board of Director related. In addition, a few other Board of Director-related transactions were coded to the SAP cost element account "5600656 Fees Directors". These transactions were coded as "4 Board of Directors Compensation and Expenses" within the "EER Report #4 Board of Directors" field. Other transactions were coded as "No" within this field.
- 11. Aviation and Travel Services transactions were identified through the SAP "Internal Order" account field. Transactions coded to "850001904397-35000127-Cessna Sovereign MN", "850001904398-35000128-Cessna Sovereign 680-0266 CO" and "850000007001-30144783-Ops 110-110- Executive (Corp)" were identified to be related to corporate aviation. These transactions were coded as "EER Schedule 8 Aviation" within the "EER Report # 8 Aviation" field. Other transactions were coded as "No" within this field.
- 12. Company employees who lobby on behalf of NSPM and Xcel Energy were identified. Their transactions were coded "9 Lobbyist Employees" within the "Employees Who Lobby From Time to Time" field.
- 13. Employee expense transactions incurred by employees who lobby from time to time on behalf of NSPM or Xcel Energy were identified, and coded as "Lobby from time-to-time" within the "Employees Who Lobby From Time to Time" field. This field was coded as "No" for other employees' transactions.
- 14. The "Posting GL Acct Desc" field was reviewed for the SAP "Cost Element" account codes identified in Table 1 to this Schedule "EER Cost Element Accounts (SAP)". Whenever a transaction was found with a matching code, the "EER Summary Account"

- field was populated with a "Yes". Transactions coded to all other accounts required for the EER reporting were identified as "No" within this field.
- 15. For all transactions identified (in Step 14 above), we populated the "Required EER Report Transaction" field as "Yes". In addition, all other transactions required for the Top Ten Compensated Employees, Board of Directors, Corporate Aviation and Lobbyist Employees were coded as "Yes" in the "Required EER Report Transaction" field. Other transactions not required to be included on the employee expense reports were coded as a "No." The "Required EER Report Transaction" field would be used at the end of the process to help develop the EER Reports. This field was used to sort-out only those transactions that would ultimately be included on the various EER Schedules.
- 16. Transactions coded to "Below-the-Line" FERC accounts based on the SAP "Cost Element" accounts (5600286 Non-Recoverable Recognition, 5600606 Dues Lobbying, 5600626 Contributions Charitable, 5600631 Contributions Community Sponsorships, 5600641 Contributions Economical Development, 5600636 Contributions Civic and Political, 5600616 Dues Chamber of Commerce, 5600621 Dues Social Service, 5600696 Deductions Corporate Tickets, and 5600701 Deductions Other) were identified. These transactions were coded as "Below" within the "Above / Below the Line" field. For all other transactions, their respective FERC account assignment determined whether they were coded as "Above" or "Below" within this field.
- 17. Lobbyists' transactions coded to "Below-the-Line" FERC accounts based on the SAP "Internal Order" accounts 200000038008-30150979-OpCoNSPM-CS-Cser-811002-9951, 200002061708-Mapping-628005-995101, 200002061710-Mapping-628105-995101 were identified. These transactions were coded as "Below" within the "Above / Below the Line" field.
- 18. Based on the SAP "Cost Element" accounts included on the Company's EER reports, the combined total number of SumTotal system transaction lines reviewed was 180,437.
- 19. Life Event-related transactions that were posted to the SAP "Cost Element" account "5600276 Life Events" were identified and coded with the word "Yes" in the "Rate Case Adj. Transaction" field for inclusion in the 2020 test year employee expense adjustment.
- 20. A list of "key words" that would be used to search the data set for transactions which may not be appropriate for rate recovery was developed. The key word list was formed from our experience in past electric rate cases and was designed to identify expenditures related to sporting and entertainment events, life events, recreation, celebrations, recognition, international travel and lobbying. The key word list contains 124 words and is provided as Table 2 to this Schedule.
- 21. The key word search was performed on transactions coded both as having the "EER Summary Cost Element" field populated with a "Yes" and the "Above-The-Line" field populated as "Above" on the following SumTotal transactional fields: "Expense Type Name", "Sub Expense Type", "Business Purpose", "Line Description", "Report Name and "Merchant".
  - a. Alcohol-related transactions were labeled "Alcohol" within the "Key Word" analytic field. In addition, key word searches were performed to identify any other alcohol-related transaction that was incorrectly coded, or that was not itemized and reported within the "Sub Expense Type" field as being alcohol-related. Alcoholic beverage-related transactions were coded with the word "Yes" in the "Rate Case Adj. Transaction" field for inclusion in the 2020 test year employee expense adjustment.

- b. International travel related transactions were identified and labeled as "Yes" within the "International Travel" field and labeled "International" within the "Key Word" field, with the exception of international travel alcohol-related expenses which were labeled "Alcohol." Transactions coded under the "Expense Type" as "Airfare International" were labeled "International" within the "Key Word" field. Other transactions of those employees who assigned airline costs to "Airfare International" were reviewed to identify the related lodging, meals and other costs associated with their international travel. These transactions were also labeled as "International" within the "Key Word" field. Finally, other transactions of those employees having traveled abroad were searched based on the "Expense Incurred Date", "Business Purpose", "Line Description", "Report Name" and "Merchant" to identify any remaining transactions associated with their international travel. These transactions were labeled as "International" within the "Key Word" field.
- c. Transactions that were not posted to the SAP "Cost Element" account "5600276 Life Events" but that were later identified by key words associated with life events such as "Funeral", "Bereavement", "Flowers", "Floral", "Wedding", "Birthday", "Baby", etc. were coded with the word "Yes" in the "Rate Case Adj. Transaction" field for inclusion in the 2020 test year employee expense adjustment.
- d. Gift-related transactions processed to merchant OC Tanner using the corporate recognition program Xcelebrate were identified and coded with the word "Yes" in the "Corporate Recognition" field and were not included in the 2020 test year employee expense adjustment. Corporate-related recognition gifts presented under the Xcelebrate program were coded as "Recognition (Gift)" within the "Key Word" field.
- e. Gift related transactions that were not previously identified by the key word search process and that were coded under the "Expense Type" of "Recognition Safety" were identified and labeled as "Recognition (Safety)" within the "Key Word" field.
- f. Gift related transactions that were not previously identified by the key word search process were identified and labeled as "Gift" within the "Key Word" field if not coded under the "Expense Type" of either "Life Event Gifts", or "Recognition Safety".
- g. Other gift-related transactions were identified and labeled as "Gift" within the "Key Word" field if they were not previously identified by the various key words (other than "Gift") but were coded under the "Sub-Expense Type" of "Career Event-Gift", "Engagement-Gift", "Recognition-Gift".
- h. Recognition related transactions were identified and labeled as "Recognition (Meals)" within the "Key Word" field if not identified by the various key words (other than "Recognition") but coded under the "Sub-Expense Types" of "Recognition Meals", "Career Event-Meal", or "Engagement-Meal".
- i. Recognition-related transactions were identified and labeled as either "Recognition (Gift)", or "Recognition (Meals)", within the "Key Word" field if not identified by the various key words (other than "Recognition") but were coded under the "Sub-Expense Type" of "Engagement-Event".
- j. Recognition related transactions were identified and labeled as "Recognition (Safety)" within the "Key Word" field if not identified by the various key words (other than "Recognition") but that were coded under the "Expense Type" of "Recognition Safety."

- k. Recognition related transactions were identified and labeled as "Recognition (Gifts)" within the "Key Word" field if not identified by the various key words (other than "Recognition") but were coded under the "Sub-Expense Type" of "Recognition Gifts."
- l. The Business Purpose field of transactions that were identified by searching for the recognition-related key words "Appreciation", "Award", "Event", "Thank You", "Gift" and "Recognition" was inspected to determine whether the transaction pertained to safety. The safety-related transactions were assigned "Recognition (Safety)" within the "Keyword" field.
- m. Key word searches often included any conceived common abbreviations of words, such as "Tckt" or "Tix" for "Ticket", "Avs" for "Avalanche", "T-Wolves" or "Wolves" for "Timberwolves", etc. The 2020 test year adjustment does not include costs related to retirement "workshops / seminars", "Retiree Broker Finalists," nor "Reach Retirement," etc. that were identified by searching for the key word "Retirement." The 2020 test year adjustment does include the celebration/appreciation/meals/gift-related and specific travel-related expenses associated with "Retirement" events.
- 22. Transactions initially identified through the key word search process, or other cursory review, were subsequently reviewed, line by line, to confirm if the transaction should be included in the rate case adjustment. Examples of transactions identified as part of the key word search but appropriate for rate recovery could include those incurred with vendors such as Holiday Inn Express, or Holiday Station Store when searching for the word "Holiday", etc. Transactions identified through the key word search process, or other cursory review, but that are not a part of the rate case adjustment are coded as "FALSE / OK" within the "Rate Case Adj. Transaction" field.
- 23. Transactions for Meals > \$65 per Attendee were idientified. Meal transactions having costs exceeding \$65 per attendee were identified as "Yes" within the "Meals > \$65 per Attendee" field. These transactions were identified based on review of the SumTotal systems' "Cost Per Attendee" data field. The entire amount of the excluded transactions' total cost that was allocated to the State of Minnesota electric retail jurisdiction was included in the 2020 test year adjustment by coding the "Rate Case Adj. Transaction" analytic field with the word "Yes".
- 24. Transactions that are not a reasonable cost of service, based on our prior experience, including large transaction amounts for airfare or lodging, etc. were identified. This was a line-by-line, field-by-field review. Transactions that would have more appropriately been recorded "below the line" were identified by populating the "Flagged Transaction" analytic field with the word "Yes". These transaction costs were coded with the word "Yes" in the "Rate Case Adj. Transaction" field for inclusion in the 2020 test year adjustment.
- 25. Transactions that could have a "vague" business purpose were reviewed. A line-by-line review of the "Business Purpose" field of all remaining above the line EER-related transactions that had not previously been assigned the word "Yes" within the "Rate Case Adj. Transaction" field for inclusion in the rate case 2020 test year adjustment was completed. If the "Business Purpose" field, in isolation, could not convey enough detail about the purpose of the transaction, the word "Yes" was placed within the "Vague Business Purpose Desc." field. Examples include single-word entries such as "Dinner," "Airfare," "Travel," and "Meeting." A line-by-line review of those transactions flagged "Yes" was performed using a combination of the Business Purpose and Line Description

fields to determine if the business purpose remained vague. Since many of the initially flagged transactions contained only acronyms, the acronyms were reviewed in conjunction with other transaction data fields. A list of 229 acronyms that are commonly used by our employees was developed. It is not intended to be a complete list of every acronym found in the Business Purpose field. It demonstrates that hundreds of industry acronyms are used by our employees and are not necessarily vague descriptions of their activities and costs. The acronym list is provided as Table 3 to this Schedule.

- 26. If the combined documentation properly supported the transaction, the transaction cost was coded as "FALSE / OK" within the "Rate Case Adj. Transaction" analytic field. The respective cost for each of the remaining transactions identified as having a "vague" business purpose were coded with the word "Yes" in the "Rate Case Adj. Transaction" analytic field for inclusion in the 2020 test year adjustment.
- 27. Transactions that were not otherwise identified by the various key words and line-by-line review that pertained to business meals involving only employees were identified. All remaining XES and NSPM employees' transactions processed with the Expense Type of "Business Meals Employee Only" were subsequently coded with the word "Yes" in the "Rate Case Adj. Transaction" field for inclusion in the 2020 test year employee expense adjustment.
- 28. The 2020 test year employee expense adjustment for SumTotal transactions was calculated by selecting all of the transactions with "Yes" in the "Rate Case Adj. Transaction" field and summing the amounts that were allocated to the State of Minnesota electric retail jurisdiction to quantify the appropriate aggregate adjustment.
- 29. The "EER Summary Report 1" which reflects the State of Minnesota electric retail jurisdiction adjusted 2020 budget test year amount was developed. The summary report provides the employee expense-related costs in the following categories that are identified in accordance to the related detail EER Schedule number that has also been provided to report the Company's 2018 actual expenditures:

Schedule1 - Travel and Lodging Expenses

Schedule 2 - Food and Beverage Expenses

Schedule 3 - Recreational and Entertainment Expenses

Schedule 4 - Board of Director Expenses

Schedule 6 - Dues and Memberships Expenses

Schedule 7 - Gift Expenses

Schedule 8 - Owned, Leased, or Chartered Aircraft Expenses

Schedule 9 - Lobbying Expenses

Note: Schedule 5 is a sub-report that provided all transactions of the Company's ten highest compensated employees and is therefore not included in the list above.

The detailed EER Schedules of 2018 actual expenses were developed:

- 1. Travel and Lodging Expenses
- 1A. VP and Above Travel and Meal Expenses
- 2. Food and Beverage Expenses
- 3. Recreational and Entertainment Expenses
- 4. Board of Director Expenses
- 5. EER Schedule 5 provides the transactions of each of the Ten Highest Compensated Employees

- 6. Dues and Memberships Expenses
- 7. Gift Expenses
- 8. Owned, Leased or Chartered Aircraft Expenses
- 9. Lobbying Expenses
- 10. PassPort and SAP Vendor Invoice Management (VIM) Applications Expenses
- 11. SAP Vendor Invoice Management (VIM) Nuclear Application Expenses
- 12. TIME Application Expenses

Each Schedule was given a Line Reference Number. Schedules 1 through 7 include the following SumTotal system data fields:

- 1. Application
- 2. Company
- 3. Expense Incurred Date
- 4. Expense Category
- 5. Expense Type
- 6. Sub Expense Type
- 7. Business Purpose
- 8. Line Description
- 9. Merchant
- 10. Approved Amount
- 11. NSPM Company Total Amount
- 12. NSPM Electric Utility Total Amount
- 13. State of Minnesota Electric Retail Amount

The following additional data fields are provided on EER Schedules 1A, 2, 3, 5A-5J and 7:

- 1. Attendees Count
- 2. Cost Per Attendee

### **Analysis of Other Company Systems**

There may be employee expenses in Company systems other than SumTotal so an analysis was performed on the transactions processed in the PassPort, SAP Vendor Information Management (VIM), SAP Vendor Information Management (VIM) – Nuclear and TIME payroll systems.

### PassPort and SAP-VIM

1. During 2017, the Company began transitioning from using its legacy PassPort system to its new SAP VIM system. In 2018, there were 4,305 transactions processed by the Xcel Energy Service Company (XES) and the NSPM Operating Company (NSPM) to the cost element accounts included in the employee-related expense analysis. Of these, the vast majority, 87%, pertain to 3,751 reimbursement request transactions entered by NSPM Company Time Keeper employees to re-fund their respective corporate petty cash accounts for non-labor expense entries incurred by the NSPM union work force across all business areas which are reported within the TIME system. Examples of these entries are per diems, meal allowances, mileage, site allowance, and safety shoes, uniforms, and other similar charges. These expenses are processed within the TIME system so that they are properly reported to the Internal Revenue Service and included in these employees' annual W2 wage statements.

- 2. The PassPort application was used by the NSPM Operating Company (NSPM) to process 48 of these transactions, or 1%, using the Company's legacy general ledger system, J.D. Edwards, which were then automatically translated into the new SAP general ledger system. The other 4,257 transactions, or 99%, were processed using the SAP-VIM application. Data was queried for XES and NSPM transactions coded to the accounts included on the Company's EER reports, as provided in Table 1 "EER Cost Element Accounts (SAP)". This was done to focus only on transactions that were either direct assigned, or that were allocated in part to the NSPM Operating Company. Transactions that did not directly assign, or allocate any costs to the NSPM legal entity were excluded from the data set. The results of the query were exported to a Microsoft Excel worksheet for further analysis and to enable sharing the information with others.
- 3. Data fields in the Microsoft Excel file include: "Company Code", "Vendor Key", "Document Date", "Item Text", "Document Type", "G/L Account Key", "Internal Order Key", "IO TYPE" and "Amount".
- 4. Data fields (appended in the spreadsheet's columns following the raw data) were added to track, analyze, and summarize the detailed transactions: "EER Report #", "Line Ref. #", "Year", "Vendor Category", "Above / Below the Line", "Flagged Transaction" and "Rate Case Adj. Transaction".
- 5. Data fields (columns) were added to the file to manually calculate the amount of each transaction's total that was allocated to the NSPM Company, NSPM Company Electric Utility and to the State of Minnesota electric retail jurisdiction. The allocations were derived by matching the accounting used for the transaction against tables of the Company's SAP general ledger accounting system data and then assigning the associated allocation factors through the use of Microsoft Excel VLookup functions. The analysis was then restricted to 4,305 transactions which ultimately allocated to above-the-line expense to the State of Minnesota Electric Retail jurisdiction, or as a below-the-line expense to the NSPM Company.
- 6. Transactions coded to "Below-the-Line" FERC accounts based on the cost element accounts 5600286 Non-Recoverable Recognition, 5600606 Dues Lobbying, 5600626 Contributions Charitable, 5600631 Contributions Community Sponsorships, 5600641 Contributions Economical Development, 5600636 Contributions Civic and Political, 5600616 Dues Chamber of Commerce, 5600621 Dues Social Service, 5600696 Deductions Corporate Tickets, and 5600701 Deductions Other were identified. These transactions were coded as "Below" within the "Above / Below the Line" field. For all other transactions, their respective FERC account assignment based on the SAP internal order used determined whether they were coded as "Above" or "Below" within this field.
- 7. The "Vendor Category" field was used to identify whether the transactions pertained to a vendor, Board, or Time Keeper/Employee reimbursement "Request For Payment" (RFP) processed in PassPort, or VIM, and then distributed to various time-keeper employees to re-fund their respective corporate petty cash accounts. These transactions are excluded from the EER Schedule 10 PassPort and SAP Vendor Invoice Management (VIM) Applications Expenses, since these payments are captured through the TIME system (as taxable payments on these employees' W2 tax forms). These transactions were coded as "In TIME System per Time Keeper (=Petty Cash Reimb.)" within the "Vendor Category" field.
- 8. Xcel Energy Board of Director-related transactions were identified through the SAP "Internal Order" account field. Transactions coded to "850000043036 CSES Board of

- Director 114" were identified to be Board of Director related. These transactions were coded as "Board of Directors" within the "Vendor Category" analytic field.
- 9. Vendor-related transactions were coded as "Outside Vendor" within the "Vendor Category" analytic field.
- 10. Based on the cost element accounts included in the analysis, there were 442 transactions that allocated costs to the State of Minnesota electric retail jurisdiction during 2018. There were 135 employee expense-related transactions processed within the PassPort and VIM systems by employees of the Xcel Energy Service Company (XES) and the Northern States Power Minnesota Operating Company (NSPM). There were 196 transactions related to Xcel Energy Board of Directors payments and reimbursements, and 111 transactions related to outside vendors.
- 11. Transactions that would have more appropriately been recorded "below-the-line" were identified. For transactions identified as such, we populated the "Flagged Transaction" analytic field with the word "Yes". These transaction costs were coded with the word "Yes" in the "Rate Case Adj. Transaction" analytic field for inclusion in the rate case' 2020 test year employee expense adjustment.
- 12. The 2020 test year employee expense adjustment for the PassPort and VIM systems' transactions was calculated by selecting all of the transactions with "Yes" in the "Rate Case Adj. Transaction" field and summing the amounts that were allocated to the State of Minnesota electric retail jurisdiction to quantify the appropriate aggregate adjustment.

## PassPort-Nuclear:

- 1. A data file of 2018 transactions from the SAP-VIM-Nuclear system was created. The file contained transactions with SAP cost element accounts corresponding to the "Posting General Ledger Account Description" field in Table 1 to this Schedule. All of the resulting transactions were directly assigned to the Northern States Power Minnesota Operating Company (NSPM).
- 2. There were no 2018 transactions processed within the legacy PassPort Nuclear system to SAP cost element accounts corresponding to the "Posting General Ledger Account Description" field in Table 1 to this Schedule.
- 3. Data fields in the SAP-VIM-Nuclear Microsoft Excel file include: "Fiscal Year", "Period", "Document Date", "Company Code", "Vendor Key", "Document Number", "Ref. document number", "Purpose", "Item Text", "Transaction Description", "Internal Order", "G/L Account Key", "IO TYPE", "Cost Center Org Lvl 1 Desc", "CC Lvl 2 Desc", "CC Lvl 3 Desc" and "Amount".
- 4. Analytic data fields (appended in the spreadsheet's columns following the raw data) were added to track, analyze, and summarize the detailed transactions: "Application", "EER Summary Object Account", "EER Report #", "Line Ref. #", "FERC Account", "Above / Below the Line", and "Rate Case Adj. Transaction".
- 5. Data fields (columns) were added to the file to manually calculate the amount of each transaction's total that was allocated to the NSPM Company, NSPM Company Electric Utility and to the State of Minnesota electric retail jurisdiction. The allocations were derived by matching the accounting used for the transaction against tables of the Company's SAP general ledger accounting system data and then assigning the associated allocation factors through the use of Microsoft Excel VLookup functions. Based on the cost element accounts included in the analysis, the total number of SAP-VIM-Nuclear system 2018 transaction lines reviewed was 37. Each of these employee expense-related

- transactions included in the analysis allocated some expense to the State of Minnesota electric retail jurisdiction.
- 6. Transactions were reviewed line by line to find any employee expenses that may be "below the line" type transactions. In such cases, the transaction would have then been identified by populating the "Rate Case Adj. Transaction" field with the word "Yes.
- 7. No costs from the SAP-VIM-Nuclear application, allocated to the State of Minnesota electric retail jurisdiction, were included as an adjustment to the 2020 test year.

#### TIME:

- 1. The TIME payroll system's data was queried for the Xcel Energy Service Company (XES) and the NSPM Company employees' non-labor transactions coded to the cost element accounts included on the Company's EER reports, as provided in Table 1 "EER Cost Element Accounts (SAP)". This provided transactions that were direct assigned to the NSPM Operating Company. The results of the queries were exported to Microsoft Excel files and combined for further analysis and to enable sharing the information with others.
- 2. The total number of TIME system 2018 transaction lines reviewed was 144,241. Of these transactions, 123,626 assigned cost to the State of Minnesota electric retail jurisdiction.
- 3. Data fields in the TIME file include: "CO" (Company), "WORK.DT", "ERNCD DESCR" (Earnings Code Desc), "SAP GL ACCT" (SAP General Ledger Account), "Internal Order", "LVL2 DESCR" (Business area), "LVL3 DESCR" (Sub-Business area), "DEPT DESCR", "UNION" (employee's category assigned as 'Yes', or 'No'), "Year", "Period" and "Total Amount".
- 4. Analytic data fields (appended in the spreadsheet's columns following the raw data) were added to track, analyze, and summarize the detailed transactions: "EER Summary Cost Element", "EER Report #", "Line Ref. #", "Utility", "Above / Below the Line", and "NSPM MN Electric 2018 Test Year Adj. Transaction".
- 5. Data fields (columns) were added to the file to manually calculate the amount of each transaction's total that was allocated to the State of Minnesota electric retail jurisdiction. The allocations were derived by matching the accounting used for the TIME system transaction against tables of the Company's SAP general ledger accounting system data and then assigning the associated allocation factors through the use of Microsoft Excel VLookup functions.
- 6. The transactions having activity in 2018 against the accounts included on the Company's EER reports were coded to "Above-the-Line" accounts.
- 7. The non-labor transaction lines identified within the TIME application were associated with NSPM union employees' tax reportable reimbursements.
- 8. The TIME application "Earnings Codes" are summarized in Table 4 "TIME Earnings Codes" located at the end of this document.
- Transactions were reviewed to find any employee expenses that may be "below the line" type transactions. No transactions that would have more appropriately been recorded "below the line" were identified.
- 10. No costs from the TIME application, allocated to the State of Minnesota electric retail jurisdiction, were included as an adjustment to the 2020 test year.

## Test Year Adjustment

The analysis described above resulted in the following employee expense-related adjustment, reducing the 2020 Budget Test Year cost of service request included in the 2019 State of Minnesota Electric Utility rate case filing:

Based on Service Company & NSPM Company employees' 2018 transactions	Total Amount	NSPM Total Amount	NSPM Electric Utility Above the Line Amount	Ad	State of MN Electric Retail ljustment Amount
SumTotal					
Key Word Search	\$ 1,074,730.58	\$ 624,005.08	\$ 589,263.49	\$	486,003.12
Business Meals - Employee Only	\$ 832,567.38	\$ 585,388.84	\$ 569,121.70	\$	466,845.09
Flagged Transactions	\$ 879,236.15	\$ 481,265.27	\$ 456,628.98	\$	383,005.49
Vague Business Purpose	\$ 166,895.28	\$ 110,916.09	\$ 106,791.79	\$	86,694.41
Life Events	\$ 63,439.21	\$ 40,283.01	\$ 38,203.65	\$	31,151.80
Meals > \$65 per Attendee	\$ 20,088.05	\$ 13,802.89	\$ 13,269.32	\$	10,904.89
Subtotal	\$ 3,036,956.65	\$ 1,855,661.18	\$ 1,773,278.94	\$	1,464,604.79
SAP-VIM / PassPort - AP					
Flagged Transactions	\$ 32,118.04	\$ 26,742.99	\$ 24,914.95	\$	21,310.25
SAP-VIM - Nuclear					
Flagged Transactions	\$ -	\$ -	\$ -	\$	-
TIME (Non-Labor)					
Flagged Transactions	\$ -	\$ - 1	\$ -	\$	-
	\$ 3,069,074.69	\$ 1,882,404.17	\$ 1,798,193.90	\$	1.485.915.05

Table 1 - EER Cost Element Accounts (SAP)

EER Summary Cost Element Account Grouping	Description	Posting GL Acct Desc
1 - Travel and Lodging Expenses	Travel and Lodging Expenses	5600191 - Employee Expenses Airfare
		5600196 - Employee Expenses Car Rental
		5600201 - Employee Expenses Taxi and Bus
		5600206 - Employee Expenses Mileage
		5600231 - Employee Expenses Parking
	Lodging Expenses	5600216 - Employee Expenses Hotel
	Misc. Travel Expenses	5600211 - Employee Expenses Conf Seminar Trng
		5600236 - EE Expenses Per Diem
		5600246 - Employee Expenses Other
2 - Food and Beverage Expenses	Meal Expenses	5600221 - Employee Expenses Meals
		5600226 - Employee Expenses Meals Non-Employee
3 - Recreational and Entertainment Expenses	Tickets and Other Entertainment Expenses	5600286 - Non - Recoverable Recognition
		5600696 - Deductions - Corporate Tickets
		5600701 - Deductions - Other
4 - Board of Directors Compensation and Expenses	Director Fees and Expenses	5600656 - Fees - Directors
6 - Dues	Professional and Social Dues	5600591 - Dues - Professional Association
		5600606 - Dues - Lobbying
		5600616 - Dues - Chamber of Commerce
		5600621 - Dues - Social Service
7 - Gifts	Recognition and Rewards	5600246 - Employee Expenses Other
		5600271 - Safety Recognition
		5600276 - Life Events
		5600281 - Employee Performance Recognition
9 - Lobbying	Civic and Political Expenses (FERC 426.4)	5600636 - Contributions - Civic and Political

Table 2 - Key Word Search List

Search Order         Key Word         Search Order         Key Word           1         Alcohol         63         Legis           2         Drinks         64         Lobby           3         Liquor         65         Political           4         Brewery         66         PUC           5         Cocktails         67         PAC           6         Beverage         68         Repr           7         International         69         Senat           8         Golf         70         Brand           9         Open         71         Sponsorship           10         Avalanche         72         Team Building           11         Broncos         73         Coach           12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80 <th></th>	
1         Alcohol         63         Legis           2         Drinks         64         Lobby           3         Liquor         65         Political           4         Brewery         66         PUC           5         Cocktails         67         PAC           6         Beverage         68         Repr           7         International         69         Senat           8         Golf         70         Brand           9         Open         71         Sponsorship           10         Avalanche         72         Team Building           11         Broncos         73         Coach           12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last	
2         Drinks         64         Lobby           3         Liquor         65         Political           4         Brewery         66         PUC           5         Cocktails         67         PAC           6         Beverage         68         Repr           7         International         69         Senat           8         Golf         70         Brand           9         Open         71         Sponsorship           10         Avalanche         72         Team Building           11         Broncos         73         Coach           12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedd	
3         Liquor         65         Political           4         Brewery         66         PUC           5         Cocktails         67         PAC           6         Beverage         68         Repr           7         International         69         Senat           8         Golf         70         Brand           9         Open         71         Sponsorship           10         Avalanche         72         Team Building           11         Broncos         73         Coach           12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Bab	
3         Liquor         65         Political           4         Brewery         66         PUC           5         Cocktails         67         PAC           6         Beverage         68         Repr           7         International         69         Senat           8         Golf         70         Brand           9         Open         71         Sponsorship           10         Avalanche         72         Team Building           11         Broncos         73         Coach           12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Bab	
4         Brewery         66         PUC           5         Cocktails         67         PAC           6         Beverage         68         Repr           7         International         69         Senat           8         Golf         70         Brand           9         Open         71         Sponsorship           10         Avalanche         72         Team Building           11         Broncos         73         Coach           12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal	
5         Cocktails         67         PAC           6         Beverage         68         Repr           7         International         69         Senat           8         Golf         70         Brand           9         Open         71         Sponsorship           10         Avalanche         72         Team Building           11         Broncos         73         Coach           12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Showe	
6         Beverage         68         Repr           7         International         69         Senat           8         Golf         70         Brand           9         Open         71         Sponsorship           10         Avalanche         72         Team Building           11         Broncos         73         Coach           12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bage	
7         International         69         Senat           8         Golf         70         Brand           9         Open         71         Sponsorship           10         Avalanche         72         Team Building           11         Broncos         73         Coach           12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
8         Golf         70         Brand           9         Open         71         Sponsorship           10         Avalanche         72         Team Building           11         Broncos         73         Coach           12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
9         Open         71         Sponsorship           10         Avalanche         72         Team Building           11         Broncos         73         Coach           12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
10         Avalanche         72         Team Building           11         Broncos         73         Coach           12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
11         Broncos         73         Coach           12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
12         Gophers         74         Retirement           13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
13         Nuggets         75         Thank You           14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
14         Rockies         76         Gala           15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
15         Saints         77         Birthday           16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
16         Timberwolves         78         Anniv           17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
17         Wolves         79         Farewell           18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
18         Twins         80         Going Away           19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
19         Vikings         81         Last Day           20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
20         Wild         82         Wedding           21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
21         Bowl         83         Baby           22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
22         Curling         84         Bridal           23         Fish         85         Shower           24         Hockey         86         Bagel	
23         Fish         85         Shower           24         Hockey         86         Bagel	
24 Hockey 86 Bagel	
I 25 IHunt I 97 IReres/ement	
26 Lucky Strike 88 Cookies	
27 Motocross 89 Doughnut	
28 Skeet 90 Donut	
29 Ski 91 Flowers	
30 Vail 92 Floral	
31 Face Plant 93 Florist	
33 Final Four 95 Fruit	
34 Tournament 96 Ham	
35 WCHA 97 Turkey	
36 Game 98 Refreshments	
37 Super Bowl 99 Snacks	
38 Concert 100 Trinkets	
39 Ticket 101 New Employee	
40 Levy (events & tickets) 102 First Day	
41 Pepsi 103 Welcome	
42 Mall of America Field 104 Get Together	
43 HHH 105 Rotary	
44 Allianz Field 106 Club	
45 Coors Field 107 Social	
46 U.S. Bank Stadium 108 Event	
47 Target Field 109 Celebration	
48 TCF Stadium 110 Party	
49 MN United 111 Award	
50 Casino 112 Gift	
51 Hooters 113 Prize	
52 Movie 114 Spouse	
53 Video 115 Spa	
54 Resort 116 Retreat	
55 Yacht 117 AGA	
56 Holiday 118 American Gas	
58 XMAS 120 EEI	
59 Chamber 121 Appreciation	
60 Commission 122 Recreation	
61 Contribution 123 Entertainment	
62 Election 124 Recognition	

Table 3 – Commonly Used Acronyms

Count	Acronym	Definition	Definition's Source
1	ACS	"Dues" - American Chemical Society (ACS) is a congressionally chartered independent membership organization which represents professionals at all degree levels and in all fields of chemistry and sciences that involve chemistry.	Internet
2	AGA	American Gas Association	Internet
3	AICPA	"acct assn" - American Institute of CPAs	Internet
4	AIHA	American Industrial Hygiene Association	Internet
5	ANS	"Dues" - The American Nuclear Society (ANS) is a not-for-profit, international, scientific and educational organization. It was established by a group of individuals who recognized the need to unify the professional activities within the diverse fields of nuclear science and technology.	Internet
6	APDA	American Power Dispatchers Association. Founded in 1946 for the purpose of encouraging and promoting the formulation and attainment of higher professional standards among System Operators (Load Dispatchers and Power Dispatchers), and for the purpose of facilitating the interchange of ideas and information, as well as for the development of a spirit of fellowship, the APDA continues to promote excellence in individual education and professional operation of the North American Bulk Electric System.	Internet
7	ARCM	"Travel for Substation Reliability Summit, ARCM kickoff meeting, and various other meetings" - ARCM stands for Adaptive Reliability Centered Maintenance.	Employee
8	ASDSO	ASDSO - Association of State Dams Safety Officials. In addition to being regulated by FERC DDS we also fall under State Requirements for Security and for two of our dams that is our only regulator.	Employee
9	ASME	American Society of Mechanical Engineers	Internet
10	ATV	Accrediation Team Visit, every four years our training programs in the nuclear area need to be Accredited, similar to accrediation for colleges. Without having an accredited training program, nuclear plants are not allowed to operate.	Employee
11	AWA	Alternative Work Arrangements - roll out of the flexible work arrangement program	Employee
12	BART	BART - Best Available Retrofit Technology evaluations (Energy	Employee
13	Boiler MACT	Supply business area)  """Boiler MACT"" is the name given to national emission standards being promulgated by the Environmental Protection Agency in an effort to curb emissions of hazardous air pollutants (HAP) from industrial boilers and process heaters.	Internet
14	BWROG	"BWR (Boiling Water Reactor) Owners' Group (nuclear) - Mission: To provide a forum, in the spirit of partnership with GE, where utility members can achieve higher plant reliability,	Internet

			Page
		maintain and improve plant safety, minimize and share costs and facilitate regulatory interaction.	
15	Byron	"Byron benchmarking" - RESULTS OF THE BYRON NUCLEAR POWER STATION UNITS 1 AND 2 SIGNIFICANCE DETERMINATION PROCESS PHASE 2 NOTEBOOK BENCHMARKING VISIT	Internet
16	CACJA	Clean Air Clean Jobs Act - In late 2010, the Colorado Public Utilities Commission approved an emissions reduction plan for Xcel Energy under the state's Clean Air-Clean Jobs Act.	Internet
17	CGA	Compressed Gas Association (CGA) develops and promotes safety standards and safe practices in the industrial gas industry.	Internet
18	CIPAC	CIPAC - Critical Infrastructure Protection Advisory Council.	Employee
19	CIPC	"NERC Critical Infrastructure Protection Committee (CIPC) - coordinates NERC's security initiatives. The group is comprised of industry experts in the areas of cyber security, physical security, and operational security. CIPC reports to NERC's Board of Trustees. It is governed by an Executive Committee, whose members manage CIPC policy matters and provide support to CIPC's subcommittees and their working groups and task forces.	Internet
20	CLE	Continuing legal education (CLE; also known as MCLE (mandatory or minimum continuing legal education)) is professional education of lawyers that takes place after their initial admission to the bar.	Internet
21	CMBG	"CMBG Conference" - Configuration Management Benchmarking Group (CMBG)	Internet
22	CONTE	"The American Nuclear Society (ANS) is a not-for-profit, international, scientific and educational organization. It was established by a group of individuals who recognized the need to unify the professional activities within the diverse fields of nuclear science and technology.  ""CONTE"" stands for Conference on Nuclear Training and Education - An International Forum on Nuclear Training, Education and Workforce Issues.	Internet
23	coss	Cost of Service Study	Employee
24	CRIB	Any items on the report that say CRIB are items purchased to support Monticello inprocessing at the Chelsea Road Inprocessing Building (CRIB).	Employee
25	CRM	CRM - Customer Relationship Management software.	Employee
26	CRMOC	Corporate Risk Management Oversight Committee	Employee
27	CSAPR	"CSAPR DC 10/02-10/04" - Judicial Review of EPA's Cross State Air Pollution Rule (CSAPR) - imposes limits on the interstate transport of emissions of nitrogen oxides ("NOx") and sulfur dioxide ("SO2") from multiple states in the eastern, Midwestern, and southern United States that, according to the Environmental Protection Agency (EPA), affect the ability of downwind states to attain and maintain compliance with national air quality standards for particulates and ozone.	Internet

			Page
28	CVI 15	CVI0015 is "Compliance Violation Investigation #15". The number is assigned by NERC. This is an investigation instituted by NERC "North American Reliability Corporation" who are the regulators overseeing the FERC mandated	Employee
		reliability standards. The investigation is still open and legal holds on all aspects remain in place at this time.	
29	DBO	Distribution Business Operations	Employee
30	DEMS	DEMS stands for Dynamic Energy Management System. The EMS is used in the control centers to manage, monitor, and control the power flow in and grid. NSP, PSCo & SPS are replacing the current Siemens EMS with a GE EMS.	Employee
31	DHS SSA	DHS SSA for Dams - Department of Homeland Security Sector Specific Agency for Dams which is responsible for Dams security.	Employee
32	DHS TSA	"DHS TSA - Department of Homeland Security Transportation Security Administration Office of Pipeline Security which under Secretarial Agreement with the Department of Transportation Regulates our Gas Asset Security.	Employee
33	DistribuTECH	DistribuTECH is the utility industry's leading smart grid conference and exposition, covering automation and control systems, energy efficiency, demand response, renewable energy integration, advanced metering, T&D system operation and reliability, power delivery equipment and water utility technology.	Internet
34	DLT	Distribution Leadership Team	Employee
35	DO	Distribution Operations	Employee
36	DSCC	DSCC - Department of Homeland Security (DHS) Critical Infrastructure Advisory Council (CIPAC) Dams Sector Coordinating Council (DSCC). This is the Private Sector Dam Owner and Operator Coordinating Council.	Employee
37	E&A support	E&A is a required Plant Evaluation and Assessment that is run by the Industry of Nuclear Power Operators and the report and grades are given directly to the CEO – this is a requirement of the operation of nuclear units throughout the country.	Employee
38	EAM	EAM: ideas related to an enterprise asset management and work management system(s). This term is commonly used in connection with the Productivity Through Technology initiative.	Employee
39	ECR	Employee Concerns Program in conjunction with the Management Safety Review Committee.	Employee
40	EDRM	Electronic document and records management (EDRM) aims to enable organizations to manage documents and records throughout the document life-cycle, from creation to destruction.	Internet
41	EDS	EDS stands for "Electric Distribution Standards"	Employee
42	EEAC	"Training for managers in Amarillo, EEAC Conference in New Orleans and Business meetings in Denver". The Equal Employment Advisory Council (EEAC) is a nonprofit employer association founded in 1976 to provide guidance to its member companies on understanding and complying with their EEO and affirmative action obligations.	Internet

43	EEI	Edison Electric Institute	Internet
44	ELS for Diversity	"""50% of 2-day workshop by ELS for	Employee
		Diversity" - Enlightened Leadership	
		Solutions (ELS) Leadership Development training seminars We	
		(ELS) Make Managers Into Leaders	
		quickly and effectively and guarantee	
		your results. The Leadership	
		Challenge: Numerous studies indicate	
		that people join organizations, but they leave bosses. Up to 80% of	
		employee turnover is directly caused	
		by ineffective managers and leaders.	
		Intangible assets like knowledge and	
		information, while hard to measure,	
		account for as much as 75% of an organization's value.	
45	EMD	"Training for EMD Diesel Engines at	Internet
		Engine Systems Inc. in Rocky Mount,	
		NC." - Electro Motive Diesel (EMD)	
	FUDOS	Engines	
46	EMDOG	Emergency Diesel Generator Owners Group	Employee
47	ENTELEC	ENTELEC is a User Association	Internet
		focusing on communications and	
48		control technologies used by	
		petroleum, natural gas, pipeline and	
	EP	electric utility companies. """Mileage Reimbursement for EP	Employee
70		meeting in Minneapolis." -	Employee
49		Emergency Planning is what EP	
		stands for and is the name of the	
		department that I previously	
	EPRI	supported.  The Electric Power Research Institute	Internet
	EFRI	(EPRI) is an independent, non-profit	internet
		company performing research,	
		development and demonstration in the	
		electricity sector for the benefit of the	
50	EPRI CBUG	public.  The Electric Power Research Institute	Internet
	LFKI CBOG	(EPRI) is an independent, non-profit	internet
		company performing research,	
		development and demonstration in the	
		electricity sector for the benefit of the public. The EPRI Circuit Breaker	
		Users Group (CBUG) facilitates	
		meetings on each breaker and are	
		intended to provide open discussions	
		on maintenance, maintenance	
		programs, technical issues, operations and maintenance	
		experiences, tools and techniques,	
		motor control center maintenance,	
		switchgear and bus maintenance.	
51	EPU	Electric Power Uprate	Employee
52	ERCM	Electronic Records Content Management. General Counsel was	Employee
		the first department to fully implement	
		it. The software is called Meridio.	
53	ERO	Electric Reliability Organization	Employee
54	FREE	(Transmission)	Interest
	ERSC	"Travel to FERC and MISO" -Entergy Regional State Committee	Internet
55	ERWG INPO	INPO - the Equipment Reliability	Internet
		Working Group (ERWG)	
56	ESRI	"Certification" - Esri Technical	Internet
		Certification exams are delivered	
		exclusively at Pearson VUE testing	
57	EUEC	centers, worldwide. """EUEC conference"" - ENERGY	Internet
	2020	UTILITY ENVIRONMENT	miernet
		CONFERENCE	
58	EU-HRMG	"Travel to Scottsdale (EU-HRMG),	Internet
		Denver" - Electric Utility-HR Metrics	
		(EU-HRMG). The EU-HRMG is a nuclear industry-wide benchmarking	
		project. The primary focus, in addition	
	1 1	to benchmarking, is HR Metrics and	1

			- rage
50	FAT	Staffing & Recruiting for the future.	Employee
59 60	FEI	Factory Acceptance Test (FAT)  "FEI Annual Dues" - Financial	Employee Internet
00	'-'	Executives International (FEI)	internet
		Financial Executives International	
		(FEI) is a member-service oriented	
		organization based in Morristown,	
		New Jersey for senior-level financial	
		executives in companies in varying	
		sizes, both public and private, and in	
		all industries.	
61	FEMA	The Federal Emergency Management Agency (FEMA) is an agency of the	Internet
		United States Department of	
		Homeland Security.	
62	FERC	Federal Energy Regulatory	Employee
		Commission	1 7 7 7 7
63	FERC DDS	FERC DDS - Federal Energy	Employee
		Regulatory Commission Division of	
		Dam Safety also responsible	
		for/regulates dam security.	
64	FFD	Fitness For Duty	Employee
65	FHR	Flint Hills Resources	Employee
66	FOF	Force On Force exercises.	Employee
67	FPED	Force Protection Equipment	Internet
		Demonstration (nuclear plant security). Equipment to meet current	
		and evolving force protection needs,	
		anti-terrorist requirements, and the	
		demands of an increasingly broad	
		range of other physical security	
		threats and challenges.	
68	FRRB	Fuel Reliability Review Board	Employee
69	FSA	FSA is an acronym for focus self-	Employee
		assessment. Duane Arnold is a	
		Nuclear power plant in Cedar Rapids	
70	FORMO	lowa.	Into an at
70	FSRUG	FSRUG Feedwater System Reliability	Internet
		User's Group - A way for Feedwater System Engineers to connect, share	
		operational experiences, and	
		recommended practices in order to	
		ensure reliable plant operations.	
71	Future State	Future State teams in HR - Talent	Employee
		Mgmt to develop improvement	
		initiatives regarding leadership,	
		performance management,	
		succession planning, culture,	
72	FWH	assessments, and on boarding.  "Travel to Pittsburgh to evaluate crack	Internet
12	FWH	found in FWH @ Holtec Inc." - Feed	Internet
		Water Heater (FWH). Holtec	
		International, a Delaware corporation,	
		is a global turnkey supplier of	
		equipment and systems for the	
		Nuclear, Solar, Geothermal and Fossil	
		Power Generation sectors of the	
70	EMC:	energy industry.	Interview
73	FWSI	BWR (Boiling Water Reactor) Owners'	Internet
		Group (nuclear) Feedwater System Improvement (FWSI)	
74	GCC	GCC - Department of Homeland	Internet
		Security (DHS) Critical Infrastructure	internet
		Advisory Council (CIPAC) Government	
		Coordinating Council (GCC).	
75	GE7FA Users Group	"GE7FA Users Group - To provide an	Internet
	1 1	open forum through conferences and	
		technological aids, to the	
		Owners/Operators of General Electric	
		Frame 7F/7H/9F/9H/6FA generator	
		systems for effective communication,	
		discussion, and information dissemination regarding the	
		operation, maintenance, inspection,	
		troubleshooting, and repair of such	
		systems to maximize equipment	
		performance and reliability.	
	+ +		
76	GPTC	Gas Piping Technology Committee /	Employee

			Page
77	Grede	"""Grede Meeting"" - Grede is Grede Foundries, a Minnesota retail customer located in St Cloud, MN	Employee
78	Hope Creek Benchmarking	"Hope Creek Benchmarking; Industry benchmarking for resolution of red /	Internet
		yellow systems" - U. S. Nuclear Regulatory Commission - Hope Creek Generating Station: Additional	
		benchmarking to establish scale model test (SMT) flow rates more	
		representative of main steam flow speeds at current licensed thermal	
79	HTAC	power (CLTP) and EPU conditions.  The HTAC is the US Secretary of	Employee
		Energy's Hydrogen and Fuel Cell Technical Advisory Committee. I was	
		appointed by the Secretary to this Committee several years ago and	
		serve as the only utility representative on the Committee. Many of the issues	
		discussed are of relevance to Xcel Energy and utilities in general (both	
		gas and electric), such as stationary fuel cells in distributed generation	
		applications and hydrogen energy storage for renewables integration applications.	
80	HRBC	HRBC stands for Human Resource	Employee
		Business Consultant. The purpose of HRBC meetings is to bring all HRBC's	
		(assigned to various business areas) together as a staff to discuss updates	
		on ongoing HR initiatives (i.e., MERIT increases, IPAD, etc), upcoming roll	
		out of new / or changes to initiatives or policy changes and focus on	
		continuity in policy interpretation around HR issues across the company.	
81	IECA	International Energy Credit Association. This is an organization	Employee
		which provides training to credit and contract administration professionals	
		in the energy credit industry. These conferences have training sessions	
		reflecting new contract issues impacting the industry, in 2012, this	
		conference focused a lot on Dodd Frank contracting compliance issues.	
82	IEEE	"Industry Dues" - IEEE, pronounced "Eye-triple-E", stands for the Institute	Internet
		of Electrical and Electronics Engineers. IEEE is the world's largest	
		professional association dedicated to advancing technological innovation.	
83	IH	Industrial Hygiene - Corporate Industrial Hygiene Support	Employee
84	ILRT	Prairie Island plant integrated leak rate test (ILRT).	Employee
85	INPO	INPO - The Institute of Nuclear Power Operations promotes excellence in the	Internet
		operation of nuclear electric generating plants.	
86 87	INPO ATV INPO E&A	INPO Accreditation Team Visit. (ATV) INPO E&A and Training Accreditation	Internet Internet
88	INPO EAG	Auditor.  INPO - Advisory Group (EAG)	Internet
89	INPO EAG	INPO - SOER 10-2, "Engaged,	Internet
		Thinking Organizations" which says you need to have a "thinking" organization.	
90	IPAD	Individual Performance And Development (IPAD) - Corporate	Employee
		employee performance evaluation reporting and review process.	
91	IPTF	Interconnection Process Task Force	Employee
92	IRC IRWA	Investment Review Council IRWA - The International Right of Way	Employee Internet
		Association (IRWA) creates public	

		raye
		awareness, trust and confidence in the
		right of way process. IRWA has united
		the efforts of its members toward
		professional development, strong
		ethics and improved service to
		employers and the public, along with advancements within the right of way
		profession. IRWA is the unsurpassed
		source of right of way educational
		programs and professional services
		worldwide. Dedicated exclusively to
		the right of way profession, IRWA has
		nearly 10,000 members throughout the
		U.S. and Canada. Our members are
		multi-disciplined professionals
		employed by private industry and
		government agencies.
94	ISA	ISA Resources -The International Internet
		Society of Automation is a nonprofit
		organization that helps its 30000
		worldwide members and other
O.E.	ISCD	automation professionals
95	ISCD	ISCD - Department of Homeland Employee
		Security Chemical (Infrastructure Security Compliance Division) which
		regulates and enforces security for
		our Registered (18) and Tiered (2)
		Chemical Facilities.
96	JAC	"JAC Meeting" - JAC stands for Joint Employee
		Apprenticeship Subcommittee, which I
		am a member representing the
		Chestnut Hazardous Waste Storage
		Facility and our Union apprenticeship
		program.
97	JTA	JTA - Job and Task Analysis. I was Employee
		assessing each Operators capability
		to perform Power System Operations
		tasks in accordance with NERC
		Standard PER-005, Requirement 2.
98	KPI	Key Performance Indicator Employee
99	KPMG	"KPMG is a global network of Internet
		professional firms providing Audit,
		Advisory and Tax services. KPMG's
		Advisory and Tax services. KPMG's Executive Education Continuing
		Advisory and Tax services. KPMG's Executive Education Continuing Education for Corporate Executives
100	KPMG IERS	Advisory and Tax services. KPMG's Executive Education Continuing Education for Corporate Executives and their Staffs.
100	KPMG IFRS	Advisory and Tax services. KPMG's Executive Education Continuing Education for Corporate Executives and their Staffs.  Meet with KPMG regarding Internet
100	KPMG IFRS	Advisory and Tax services. KPMG's Executive Education Continuing Education for Corporate Executives and their Staffs.  Meet with KPMG regarding International Financial Reporting
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101 102 103	LRIWG  LRTF  MARC	Advisory and Tax services. KPMG's Executive Education Continuing Education for Corporate Executives and their Staffs.  Meet with KPMG regarding International Financial Reporting Standards (IFRS) readiness assessment proposal." KPMG is a global network of professional firms providing Audit, Advisory and Tax services.  "LPI Meeting" - LPI stands for Liberty Paper Incorporated in Becker, a Minnesota retail electric customer of NSP  Attend the NEI License Renewal Implementation Working Group (LRIWG) meeting in Miami, FL  LRTF Meeting supporting license renewal aging management. LRTF stands for (Babcock & Wilcox Owners Group (B&WOG)) License Renewal Task Force  Mid-America Regulatory Conference  Employee
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101 102 103	LRIWG  LRTF  MARC	Advisory and Tax services. KPMG's Executive Education Continuing Education for Corporate Executives and their Staffs.  Meet with KPMG regarding International Financial Reporting Standards (IFRS) readiness assessment proposal." KPMG is a global network of professional firms providing Audit, Advisory and Tax services.  "LPI Meeting" - LPI stands for Liberty Paper Incorporated in Becker, a Minnesota retail electric customer of NSP  Attend the NEI License Renewal Implementation Working Group (LRIWG) meeting in Miami, FL  LRTF Meeting supporting license renewal aging management. LRTF stands for (Babcock & Wilcox Owners Group (B&WOG)) License Renewal Task Force  Mid-America Regulatory Conference "MASMS" - The Minnesota Educational Facilities Management Professionals (also known as MASMS) is a group of over 300 individuals in the area of facilities/grounds/health & safety/operations. The purpose of MASMS is to develop and maintain high standards in the administration, care, operation, planning, budgeting and development of buildings and

			raye
		Coordination Team, a new team formed under Supply Chain. The main responsibility is ensuring that materials are on time in full for all Substation and Transmission projects prior to construction start. The initiative spans all three OPCO's for coverage and our primary role is coordination of materials from the Supplier/Distributor to the Xcel Energy jobsite and/or Xcel Energy Warehouse for all major Substation and Transmission projects. We are striving for keeping crews working and having the materials at the right time, right place for increased productivity. MCT works with Engineering, Design, Construction,	T dge /
107	MIPSYCON	Buyers, Accounts Payable, Project Controls, Sourcing, Suppliers, & Warehousing to accomplish these tasks.  "Minnesota Power Systems Conference (MIPSYCON) - provides electric utility engineers and consultants the opportunity to stay abreast of today's power system technology. The conference	Internet
108	MISO	emphasizes the unique challenges faced by electric utilities in the Midwest. The conference also serves as a forum for power engineers to meet with their colleagues from other utilities to discuss mutual concerns.  "Midwest Independent System Operator (MISO) is an essential link in	Internet
		the safe, cost-effective delivery of electric power across much of North America. We are committed to reliability, the nondiscriminatory operation of the bulk power transmission system, and to collaborating on creating cost-effective and innovative solutions for our changing industry.	
109	Mk5 Control System training	"Mk5 Control System training in Salem, VA" - GE Energy Technical Training - This course provides training on the essential elements of the Mk V turbine control system. The course will include instruction on the hardware and software components of the Mk V control system and its interface system (HMI). Alarm troubleshooting and LVDT calibration will be central topics of the program.	Internet
110 111	MNGP MNCPA	Monticello Nuclear Generating Plant "acct assn" - Minnesota Society of	Employee Internet
		CPAs	Internet
112 113	MNOPS MNSEIA	Minnesota Office of Pipeline Safety  The Minnesota Solar Energy Industries Association (MnSEIA) represents and serves Minnesota energy professionals and solar energy users.	Internet Internet
114 115	MP MRM	Marquette Plaza office - Minneapolis  Management Review Meeting - these meetings are conducted to discuss process and expenditure changes that are made by the site management are subsequently reviewed by corporate management to ensure alignment with the Company's business goals.	Employee Employee
116	NAEMA	The North American Energy Markets Association (NAEMA) is an independent, nonprofit trade association representing entities involved in the buying and selling (marketing) of energy or in providing	Internet

		services to the energy industry.	
117	NAPCO	North American Power Credit Organization	Employee
118	NARUC	"National Association of Regulatory Commissioners (NARUC) is the national association representing the State Public Service Commissioners who regulate essential utility services in your State. NARUC members are responsible for assuring reliable utility service at fair, just, and reasonable	Internet
		rates.	
119	NDE NEI / NEA	Non-destructive examinations  "The Nuclear Energy Institute (NEI) is the policy organization of the nuclear energy and technologies industry and participates in both the national and global policy-making process. NEI's objective is to ensure the formation of policies that promote the beneficial uses of nuclear energy and technologies in the United States and around the world. The Nuclear Energy Agency (NEA) is a specialized agency within the Organization for Economic Co-operation and Development	Employee Internet
121	NEIL	(OECD), an intergovernmental organization of industrialized countries, based in Paris, France.  Nuclear Electric Insurance Limited	Internet
121	NEILE	(NEIL) - The Company insures electric utilities for damages to insured sites, decontamination expenses incurred at such sites arising from nuclear contamination, other risks of direct physical loss at such sites, certain premature decommissioning costs, and the costs associated with certain long-term interruptions of electricity supply.	internet
122	NERC	NERC "North American Reliability Corporation" who are the regulators overseeing the FERC mandated reliability standards.	Employee
123	NESCSL	Nuclear Energy Supply Chain Strategic Leadership	Employee
124	NFPA	"Codes" - National Fire Protection Association (NFPA) - The world's leading advocate of fire prevention and an authoritative source on public safety, NFPA develops, publishes, and disseminates more than 300 consensus codes and standards intended to minimize the possibility and effects of fire and other risks.	Internet
125	NICET	"License" - National Institute for Certification in Engineering Technologies (NICET) defines engineering technicians as the "hands-on" members of the engineering team who work under the direction of engineers, scientists, and technologists. More than 125,000 technicians and technologists have met NICET's rigorous certification criteria, and the number grows rapidly as more employers and local and state governments rely on NICET certification to measure the qualifications of their workforce.	Internet
126	NIEP	Nuclear Industry Evaluation Program (NIEP) - Insights to influence performance excellence at operating nuclear power plants.	Internet
127	NNSC	The National Nuclear Security Conference is an opportunity for security professionals to gather, exchange ideas and participate in discussions on the latest industry and	Internet

		Nuclear Regulatory Commission	
	1124	trends.	<b></b>
128	NRA	"NRA" - The National Rifle Association (PI FOF and Range/Training Items)	Employee
129	NRC	The Nuclear Regulatory Commission	Internet
130	NRC RIC	NRC - Regulatory Information	Internet
404	NDDDT	Conference (RIC)   "NRRPT Annual Dues" - The National	Int
131	NRRPT	Registry of Radiation Protection	Internet
		Technologists (NRRPT)	
132	NSCA	Nuclear Safety Culture Assessment	Internet
		(NSCA) - All operating nuclear power plants strive to receive the coveted	
		INPO "Excellent" rating on their	
		evaluations; therefore, when the	
		organization released the Principles	
		for a Strong Nuclear Safety Culture in late 2004, nuclear power plant owners	
		took notice. The Utilities Services	
		Alliance Inc. (USA) responded to the	
		INPO document and focused on ensuring its member plants operate in	
		what it calls a "Strong Nuclear Safety	
		Culture." USA developed the Nuclear	
		Safety Culture Assessment (NSCA)	
		process tool. The tool's purpose is to evaluate an organization's overall	
		safety culture and provide an early	
		warning of areas where that culture	
		could be beginning to erode. The tool is a formal mechanism that judges	
		plant personnel's behaviors to ensure	
		they maintain the appropriate focus on	
		nuclear safety.	
133	Nuclear AA/FFD	Nuclear Access Authorization (AA) - The licensee for each nuclear power	Internet
		plant licensed under 10 CFR Part 50 is	
		required to develop, implement, and	
		maintain an Access Authorization (AA)	
		program to protect against an insider threat at the plant. Fitness For Duty	
		(FFD) - implementation of 10 CFR Part	
		26 Fitness for Duty Program	
134	NUCC	requirements.  Nuclear Utility Coatings Council	Employee
135	NWSC	Nuclear Waste Strategy Coalition	Employee
136	ODL	Outdoor Lighting - Distribution	Employee
137	ОН	Operations Overhead Electric Service Lines -	Employee
137	On	Distribution Operations	Lilipioyee
138	PAC	PAC stands for "Program Advisory	Employee
		Committee". This acronym is used by	
		Energy Supply and Nuclear Generation employees. These are	
		quarterly training meetings. The	
		maintenance programs that require	
		these meetings are I&C, Electrical and Mechanical.	
139	PACT	PACT is the Professional Association	Employee
		of Computer Trainers.	
140	PBAPS	"Traveled to PBAPS in Delta, Pa to	Internet
		walk down their RP Remote Monitoring Camera system." - Peach	
		Bottom Atomic Power Station	
		(PBAPS) is a two-unit nuclear	
		generation facility located on the west bank of the Conowingo Pond	
		(Susquehanna River) in Delta,	
		Pennsylvania.	<u></u>
141	PINGP	Prairie Island Nuclear Generating	Employee
142	PM	Plant-PINGP Project Manager	Employee
142	PMI	Project Manager Project Management Institute	Employee Employee
144	PowerPlan	"Work with PowerPlan in Denver" -	Internet
		PowerPlan's business performance	
		management (BPM) solution provides	
		powerful budgeting, in-depth analysis, and flexible reporting features that	

		cumbersome, error-prone tools.	
145	PRA	Probabilitistic Risk Assessment (PRA) Modification	Employee
146	PRDIG	Pressure Relief Device Interest Group (PRDIG)	Employee
147	PTL	"PTL Meeting at Wilmarth" - PTL is short for "Pathway to Leadership" and the meeting was at the Wilmarth	Employee
		power plant. Pathway to Leadership is a program Xcel Energy has initiated to	
		identify and develop future leaders for the company in a mentoring intense	
		setting. In this program, members of our mentoring group visited a small Refuse Derived Fuel (RDF) power	
		electrical generating facility and had our monthly meeting on site. The	
148	PTT	topic was on Trust in the Workplace.  Productivity Through Technology	Internet
		(PTT) is a commitment to uncover innovative solutions to employees'	
		work challenges. We are evaluating technologies that can streamline, simplify, and improve work processes	
		throughout the Operations and Nuclear organizations.	
149	PWG	"THIS IS PSCo: PWG stands for Performance work group, it's part of	Employee
		WECC Western Electric coordinating council which PSCO is a part of the	
		interconnection (www.wecc.biz) I am on the PWG group which helps define	
150	PWR Owners Group	standards for WECC and NERC and assists with compliance of members."  Pressurized Water Reactor (PWR)	Internet
151	PWROG	Owners Group (nuclear)  "Pressurized Water Reactor Owners	Internet
131	FWROG	Group - Nuclear - Attend the PWROG Meeting	internet
152	Quad FBM	Formal Benchmark of Quad Cities Nuclear Generating Station.	Employee
153	RDF	RDF - Renewable Development Fund	Employee
154 155	RFP FAT	Request For Proposal (RFP)	Employee
156	RIC	Renewable Energy Credits  U.S. Nuclear Regulatory Commission's (USNRC's) Regulatory Information Conference (RIC)	Internet
157	RIMS	Risk Management & Insurance Society	Internet
158	River Bend	"""Benchmark trip to River Bend"" - River Bend Nuclear Generating Station	Internet
		is a nuclear power station on a 3,300- acre (13 km2) site near St. Francisville, Louisiana, approximately 30 miles (50	
		km) north of Baton Rouge. The plant has a General Electric 978 MW[1]	
		boiling water reactor, which began operation on June 16, 1986. River	
		Bend is operated by Entergy Nuclear and owned by Entergy Gulf States,	
159	RMEL	Inc.  RMEL is a not-for-profit energy trade association that has served the	Internet
		electric utility industry with a variety of education and networking services	
		since 1903. Dedicated to fostering a thriving community of electric energy	
		professionals, RMEL's 300 corporate members share ideas, techniques and	
		programs to better serve the industry and its customers. Once known as the Rocky Mountain Electrical League.	
160	RPC	"NSP Plant Visit, NSP Directors' and NSP RPC attendance" - RPC is the	Employee
		"Regional Project Committee" capital project meeting. Committee meets to	
		review Energy Supply's ongoing & future capital projects.	
161	RPS	RPS - Renewable Portfolio Standard	Employee

RSC   RSC stands for Regional Safety   Committee. Each of our power plants in the MNWI region has a safety committee. The RSC is composed of regions plant safety committees (approx. 25 people). The RSC works on safety issues/initiatives at a regional level.   RSC works on safety issues/initiatives and works are a has a field employee satigned as a member to proactively seek solution to safety concerns and chalance worksplace concerns and chalance worksplace concerns and chalance worksplace w				1 age
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RTC   Riverside Training Center (Riverside generation plant — Unit #3   Employee				
SACC Job Fair   Series   Ser	163	RTC		Employee
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176 SFDC SFDC SFDC - SalesForce.Com. The meetings were to set the requirements	175	SDG&E		Internet
meetings were to set the requirements	470	L SEDS		Facility 1
	1/6	SEDC		∟mployee
relationship management) software.				
177 SFPE Society of Fire Protection Engineers Employee	177	SEPE		Employee

			Page 2
178	SGA	Southern Gas Association - a 501 (c)(6) organization. Serves members who conduct business in the following sectors of the natural gas industry: Distribution, Transmission (pipeline) and Gas Supply Marketing. Produces events and manages joint industry projects, conducts surveys on	Internet
		business critical issues, and facilitates peer-to-peer collaboration for the purpose of identifying and implementing best practices.	
179	SGMP TAG	Steam generator management program technical advisory group	Employee
180	SGS	SGS is the world's leading inspection, verification, testing and certification company. The Company was first registered in Geneva as Société Générale de Surveillance in 1919.	Internet
181	SHC	Sherco Fossil Plant.	Employee
182	SIM	SIM - Strategic Initiative Meeting	Employee
183	SHRM	"SHRM" - The Society for Human Resource Management (SHRM) is the world's largest association devoted to human resource management. Representing more than 250,000 members in over 140 countries, the Society serves the needs of HR professionals and advances the interests of the HR profession.	Internet
184	SISW	Safety Intervention and Stop Work training. This was required training. The training was required to be completed in a specific time frame so travel was required to the sites where the employees were working.	Employee
185	Skire Unifier Software	Skire's Unifier (software) offers an agile, web-based, collaborative solution for organizations looking to manage, maintain and optimize their property portfolio, facilities and capital assets.	Internet
186	S&T	Safety and Training department	Employee
187	SL&R	Siting and Land Rights department.	Employee
188	SLT	Senior Leadership Team	Employee
189	SME	"Travel for meetings in order to transition from SME to Sub Syst Perf department" - SME stands for Substation Maintenance Engineering	Employee
190	Sox	Sarbanes-Oxley (SOx) - The Sarbanes-Oxley Act of 2002, or SOX, is a United States federal law that set new or enhanced standards for all U.S. public company boards, management and public accounting firms.	Internet
191	SPP	Southwest Power Pool Electric Energy Network	Internet
192	Star Achievement Certification	Star Achievement Certification Part III"" (training) - Star Achievement Certification: The Star Achievement Series® is a training program developed by the Founder and CEO of Office Dynamics, Ltd, Joan Burge. Joan is an author and national corporate trainer with over 25 years of experience in the administrative and training profession. The philosophy behind Star Achievement® is that it takes a combination of skills, attitude, teamwork and strategies to stay on the cutting edge.	Employee
193	STEP	STEP - Success Through Employee Participation employee development program	Employee
194	SUG	The Settlement User Group shall be utilized to develop recommendations related to financial settlements of Energy Market activities administered by SPP.	Internet

			raye
195	SWG	"SWG Meeting" - SWG stands for Security Working Group. It is a group of utility security professionals, NEI (Nuclear Energy Institute) and NRC folks.	Employee
196	Taleo	The Oracle Taleo Cloud Service enables enterprises and midsize businesses to recruit top talent, align that talent to key goals, manage performance, develop and compensate top performers, and turn today's best performers into tomorrow's leaders.	Internet
197	TAPS	TAPS - Travel and Procurement System. The new SumTotal application includes functionality to require users to upload scanned images of required receipts and attach them to their expense report systematically.	Employee
198	TLP	TLP - Transmission's Transmission Line Performance department	Employee
199	TM	TM - Human Resources' Talent Management department	Employee
200	TMI	TMI - Three Mile Island nuclear	Employee
201	TRO	TRO stands for Transmission Resource Optimization. The substation group although in the transmission business unit actually works on both transmission and distribution substation assets.	Employee
202	True North	"True North Membership Dues" - True North Consulting is an Engineering Services company specializing in support for the electric power industry. Founded in 1999, True North has provided engineering based consulting services to the majority of US utilities and to several abroad.	Internet
203	TSPS	TSPS - Transmission & Substation Performance and Standards.	Employee
204	TSS	TSS - Transmission and Substation	Employee
205	TW	Standards  Towers Watson Vendor - a leading global professional services company that helps organizations improve performance through effective people, risk and financial management, offering solutions in the areas of benefits, talent management, rewards, and risk and capital management.	Internet
206	UCMDB	UCMDB is Universal Configuration Management Data Base. It's a system that tracks, records, and correlates hardware and software throughout the company. We are implementing the uCMDB for monitoring and controlling assets and asset interactions across the company.	Employee
207	UFLS	Under Frequency Load Shed - Distribution Electric Engineering program	Employee
208	UG	Under Ground systems	Employee
209	UHC	United Healthcare vendor - Health insurance and medical care options for employer groups.	Internet
210	UI	Utilities International, Inc. vendor - Utilities International's UIPlanner software is designed specifically for utilities. UIPlanner is now the leading financial planning software within the utility industry.	Internet
211	USA	Utilities Service Alliance (USA) is a not-for-profit cooperative designed to facilitate collaboration among its member utilities. Together, we work to reduce operating and maintenance costs, improve safety and	Internet

			Page .
		performance, and provide innovation and leadership within the nuclear power industry.	
212	USUG	Utility Simulator Users Group - "Simulator Supervision MNGP ILT, NRC Exam Post Exam Activities, ANSI/ANS-3.5 Committee Meeting	Internet
213	USSD	FERC - United States Society on Dams	Internet
214	USWAG	Utility Solid Waste Activities Group - USWAG provides the most comprehensive, knowledgeable and experienced legal and technical resources on utility solid waste management issues available.	Internet
215	UVIG	Utility Variable-Generation Integration Group - The UVIG Board of Directors officially voted to change our name from the Utility Wind Integration Group (UWIG) to the Utility Variable- Generation Integration Group at the board meeting in Maui last October. The change was driven by requests from our members facing rapid growth from solar generation.	Internet
216	UWIG	Utility Variable-Generation Integration Group - The UVIG Board of Directors officially voted to change our name from the Utility Wind Integration Group (UWIG) to the Utility Variable- Generation Integration Group at the board meeting in Maui last October. The change was driven by requests from our members facing rapid growth from solar generation.	Internet
217	Ventyx	Ventyx, an ABB company, is the world's leading supplier of enterprise software and services for essential industries such as energy, mining, and public infrastructure.	Internet
218	voc	VOC is an internal abbreviation for Voice of the Customer, an ongoing tracking market research study of customer perceptions of Xcel Energy. Focus groups were held to provide direction for the online portion of the work now underway.	Employee
219	VOIP	VOIP - Voice Over Internet Protocol	Employee
220	WAPA	Western Area Power Administration	Internet
221	WECC	The Western Electricity Coordinating Council (WECC) is the Regional Entity responsible for coordinating and promoting Bulk Electric System reliability in the Western Interconnection.	Internet
222	WFC	WFC - Human Resources Workforce Strategy department's "Work Force Council"	Employee
223	WFP	"WFP is "Work Force Planning", which is a major ongoing Corporate HR and Operations initiative to make sure our staffing is "right-sized", with the right number and mix of employee grades and skill sets for the future. Also part of this is developing short- and long-term plans to prepare the Company for employee retirements and the associated loss of institutional knowledge.	Employee
224	WFR	WFR - Human Resources' Safety & "Work Force Relations" department	Employee
225	WICF	"The Western Interconnection Compliance Forum (WICF) has emerged as a dynamic information sharing organization within the Western Interconnection. It is run by and on behalf of entities subject to WECC and NERC compliance requirements."	Internet
226	WIL	WIL - "Women in Leadership" is an	Employee

		industry professional organization	
227	WIN	WIN - "Women's Interest Network" which is an Xcel Energy employee network group. Our team often supports various employee events they hold to develop their members (Xcel Energy employees), focused on career development, competencies and interviewing skills.	Employee
228	WSPP	Western Systems Power Pool (WSPP) is an agreement and an organization that creates power trading opportunities and allows WSPP members to manage power delivery and price risk. The Current WSPP Agreement effective April 23, 2012, updated July 12, 2012, is the most commonly used standardized power sales contract in the electric industry. It is approved by the FERC and used by jurisdictional and non-jurisdictional entities.	Internet
229	WUA	Wisconsin Utilities Association	Internet

**Table 4 - TIME Earnings Codes** 

Earning Code Group	Earning Code Desc		
Per Diem-Related	Per Diem Overnite -		
	Per Diem Rptg - T/R		
	Per Diem Overnite Tx		
	Per Diem Non-Tx M&I		
	PerDiem Txbl M&l		
	Per Diem Taxable		
	Per Diem Overnite No		
Meal-Related	Overtime Meal Taxabl		
	Overtime Meal Cash		
	Taxable Meal		
	Meal Non-Taxable		
Mileage-Related	Zone Mileage		
	Casual Use Mileage		
	Maximo Mileage		
Allowance-Related	BA Site Allowance		
	Outage Allowance		
Other	Midweek Trnsfr Pymt		
	Reporting Pay		
	Daily Trav-Res Share		
	Boiler Lic Reimburse		
	Daily Assg-Res Share		
	Parking Reimbursment		
	Uniform Reimbursemen		

## Northern State Power Company

Fleet, Tools, & Equipment - Capital Additions State of MN Electric Jursidiction Includes AFUDC

Capital Budget Groupings	WBS Level 2 #	Description	2020	2021	2022
Fleet, Tools, & Equipment	A.0006056.002	MN-Dist Fleet New Unit Purchase El	(9,391,000)	(12,207,000)	(16,965,000)
Fleet, Tools, & Equipment	A.0006056.003	MN-Dist Fleet New Unit Purchase Com	(633,847)	(988,565)	(1,466,145)
Fleet, Tools, & Equipment	A.0006056.091	MN Transportation Units Over 50K	(3,285,000)	(3,185,000)	(3,235,000)
Fleet, Tools, & Equipment	A.0006056.205	MN-Dist Fleet New Unit Purchase El	(2,525,585)	(1,485,093)	(1,333,912)
Fleet, Tools, & Equipment	A.0006056.206	MN-Dist Fleet New Unit Purchase Com	(269,056)	(231,514)	(321,428)
Fleet, Tools, & Equipment	A.0006056.221	Fleet New El Trans MN <\$50K	(115,000)	(115,000)	(165,000)

PUBLIC DOCUMENT—NOT PUBLIC AND HIGHLY CONFIDENTIAL DATA HAS BEEN EXCISED

Northern States Power Company

Docket No. E002/GR-19-564

Exhibit\_\_\_(GJO-1), Schedule 10

Page 1 of 3

**Employee Labor Costs for Lobbying Activities** 

In compliance with ALJ Finding 557 in Docket No. E002/GR-10-971, this

schedule includes a report of the total compensation for employees engaged in

lobbying, with an explanation of the costs included and excluded in the rate

request.

This schedule shows the total salary budgeted for 2020 employees engaged in

lobbying and other civic and political type activities. This includes employees

whose compensation is, in part, included in this rate request.

Employee labor costs are budgeted within a department by level of position based

on the average salary for that position. The department labor costs are then

allocated between lobbying and non-lobbying activities at an aggregated level and

reported in total for each department. Labor costs are also not uniquely identified

in the budget specific to just legislative lobbying. FERC account 426.4 includes

lobbying and other civic and political type activities. Using this budgeting process,

the approximate percentage of time spent by each of the employees performing

lobbying and other civic and political type activities is shown in this schedule. This

is the percentage that is budgeted below the line.

Using this budgeting process, this schedule also shows the amount included in

above the line FERC account 920 for 2020.

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Northern States Power Company

Docket No. E002/GR-19-564 Exhibit\_\_(GJO-1) Schedule 10 Page 2 of 3

PROTECTED DATA ENDS]

Lobby Costs

NSPM Government Affairs - MN

Lobbying Activities = 20% Non Lobbying Activities = 80%

Non Lobbying Activities = 80%					
			Total of Average		Non-Lobbying Labo
Job Code	Number of Positions [PROTECTED DATA BEGINS	Average Salary	Salaries	Costs (1)	Costs (2)
DIR581: Director Regional Government Affairs	[PROTECTED DATA BEGINS	•			
FML115: Manager State Government Affairs					
Vacant					
				PROTEC	TED DATA ENDS
Federal Government Affairs					
Lobbying Activities = 57.3%					
Non Lobbying Activities = 42.7%					
			Total of Average	Lobbying Labor N	Jon Lobbying Labo
Job Code	Number of Positions	Average Salary	Salaries	Costs (1)	Costs (2)
	[PROTECTED DATA BEGINS			00000 (-)	5 0 0 0 0
AST273: Administrative Assistant	•				
COS280: LOBBYIST*FEDERAL GOVN'T AFFAIR					
COS404: CONSULTANT*CIV & POLTCL ENGMNT					
OIR796: SR DIR*FED GOVTL AFFAIRS					
				PROTEC	TED DATA ENDS
Community Belosians MM					
Community Relations - MN Lobbying Activities = 7.6%					
Non Lobbying Activities = 92.4%					
,					
			Total of Average	Lobbying Labor N	Jon-Lobbying Labo
Job Code	Number of Positions	Average Salary	Salaries	Costs (1)	Costs (2)
	[PROTECTED DATA BEGINS				
AST273: Administrative Assistant					
COS180: Community Relations Manager					
COS449: MANAGER*EXTERNAL AFFAIRS					
DIR647: Director Community Relations					

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Northern States Power Company

Docket No. E002/GR-19-564 Exhibit\_\_(GJO-1) Schedule 10 Page 3 of 3

Policy & Federal Affairs Lobbying Activities = 3.9%

Non Lobbying Activities = 96.1%

Job Code	Number of Positions	Average Salary	Total of Average Salaries	Lobbying Labor N Costs (1)	Non-Lobbying Labor Costs (2)
	[PROTECTED DATA BEGI		Sularres	50015 (1)	30010 (2)
AST274: ASSISTANT*ADMINISTRATIVE IV					
BVP076: VP, POLICY AND FEDERAL AFFAIRS					
				PROTEC	TED DATA ENDS
				THOTES	122 2:11:12: (20]

Notes:

(1) Approximate amount of compensation included in below the line FERC account 426.4
(2) Approximate amount of compensation included in above the line FERC account 920