

February 10, 2020

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E,G002/S-19-662

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department), in the following matter:

Petition of Northern States Power Company, a Minnesota corporation for Approval of
Capital Structure for Issuance of Long-Term and Short-Term Securities for 2020.

The Petition was filed on October 25, 2019 by:

Patricia L. Martin
Assistant Treasurer
Xcel Energy Services Inc.
414 Nicollet Mall (401-4th Floor)
Minneapolis, Minnesota 55401

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve** the Petition, and is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ CRAIG ADDONIZIO
Financial Analyst

CA/ja
Attachment



Before the Minnesota Public Utilities Commission

**Comments of the Minnesota Department of Commerce
Division of Energy Resources**

Docket No. E,G002/S-19-662

I. INTRODUCTION

On October 25, 2019, Northern States Power Company (NSP-MN or the Company) filed a petition (Petition) seeking approval from the Minnesota Public Utilities Commission (Commission) for the Company's proposed 2020 capital structure, as well as permission to issue securities within the scope of the proposed capital structure, plus contingencies. Specifically, NSP-MN is seeking:

- approval of its proposed capital structure and total capitalization;
- continued authorization of the ability to issue securities provided it remains within the approved capital structure;
- continuation of flexibility to use risk management instruments to manage risk associated with the cost of capital;
- continuation of the variance of Minn. R. 7825.1000, subp. 6 to allow the Company to treat borrowings under multi-year credit agreements as short-term debt;
- approval to have discretion to enter into financings to replace outstanding long-term debt instruments with less expensive securities after considering the debt issuance expenses and amortization of redemption premiums, and to enter into tax-exempt financings for pollution control construction programs; and,
- approval of the 2020 capital structure until the Commission issues a 2021 capital structure Order.

Table 1 below summarizes NSP-MN's actual capital structure as of June 30, 2019, its proposed capital structure on December 31, 2020, and the differences between the two.

Table 1
NSP-MN's Actual and Proposed Capital Structure

	Actual		Proposed		Difference	
	June 30, 2019		Dec. 31, 2020			
	(\$ Millions)	(%)	(\$ Millions)	(%)	(\$ Millions)	(%)
Common Equity	5,768	52.7%	6,597	52.3%	829	-0.3%
Short-Term Debt	244	2.2%	233	1.8%	(11)	-0.4%
Borrowings Under 5-Year Credit Facility	-	0.0%	-	0.0%	-	0.0%
Total Short-Term Debt	244	2.2%	233	1.8%	(11)	-0.4%
Long-Term Debt	4,939	45.1%	5,774	45.8%	835	0.7%
Total Capitalization	10,951	100.0%	12,604	100.0%	1,653	0.0%
2020 Contingency			596	4.7%		
Total Capitalization with Contingency			13,200	104.7%		

Source: Petition, Attachment B

As shown, the Company's proposal reflects an increase in total capitalization of \$1.7 billion, or approximately 15 percent, over the 18 months ended December 31, 2020, and small changes in its equity and debt ratios.

II. FILING REQUIREMENTS AND COMPLIANCE WITH PRIOR COMMISSION ORDERS

A. FILING REQUIREMENTS

Minnesota Rules 7825.1000 – 7825.1500 and the Commission's May 12, 2009 Order in Docket No. E,G999/CI-08-1416 (the 08-1416 Order) contain the filing requirements for capital structure petitions. The Department reviewed the Company's Petition and concludes that it satisfied all filing requirements set forth in Minnesota Rules.

Points 1 and 3 of the Commission's Order in Docket No. E,G999/CI-08-1416 state, respectively:

1. In addition to the information currently provided, the utilities' annual capital structure filings shall include an exhibit providing a general projection of capital needs, projected expenditures, anticipated sources, and anticipated timing, with the understanding that such exhibit is not intended to require dollar-for-dollar on the uses identified in the exhibit or to limit issuances to project-specific financing. The exhibit need not list short-term, recurring security issuances.
3. Starting with the utilities' next annual capital structure filings, the utilities shall include a report of actual issuances and uses of the funds

from the prior year. The report will be for information purposes only and need not cover short-term, recurring security issuances.

With respect Point 1 of the Order, Attachment H to the Company's Petition details NSP-MN's expected sources and uses of cash during 2020, and Attachment N provides further information regarding the Company's long-term investment plans.¹ With respect to Point 3 of the Order, Attachment H to the Company's Petition also reports on the Company's actual issuances during 2018 and early 2019. The Department provides additional discussion related to NSP-MN's 2019 issuance below.

B. OTHER ONGOING REPORTING REQUIREMENTS AND ONGOING COMPLIANCE ISSUES

1. Docket No. E,G002/S-02-1907

As described on page 9 of the Company's Petition, the Commission's January 13, 2003 Order in Docket No. E,G002/S-02-1907 (the 02-1907 Order) imposed a number of compliance requirements on NSP-MN. For example, the 02-1907 Order requires the Company to:

- file capital structure petitions annually;
- provide specific explanations of the purpose for proposed security issuances;
- address the appropriate cost of capital to apply in filings during the next 12 months;
- not encumber utility property in Minnesota for purposes other than operating the utility; and
- not make inter-company loans to Xcel Energy Inc.

After review, the Department concludes that NSP-MN has reasonably complied with the 02-1907 Order, with one minor exception. On page 9 of its Petition, the Company identifies the cost of capital approved in Docket No. E002/GR-15-826 (7.08 percent), which reflects a return on equity of 9.20 percent, as the cost of capital to apply in filings. The Department notes that more recently, in Docket E002/M-17-797, the Commission approved a return on equity of 9.06 percent for the Company, which, as shown below, yields a cost of capital of 7.01 percent.

¹ The Department notes that the Company inadvertently omitted Attachment H from its Petition. In response to an inquiry from the Department, the Company provided that information, which is included with these comments as Department Attachment 1.

Table 2
NSP-MN Cost of Capital²

	Rate	Ratio	Weighted Cost
Short Term Debt	4.31%	1.69%	0.07%
Long Term Debt	4.75%	45.81%	2.18%
Common Equity	9.06%	52.50%	4.76%
Weighted Average Cost of Capital			7.01%

2. Docket No. E002/M-00-1553

The Commission's June 3, 2014 Order in Docket No. E002/M-00-1553 requires the Company to report in its capital structure on its Exempt Wholesale Generator and Foreign Utility Company investments. On page nine of its Petition, NSP-MN reported that it has no such investments. The Department concludes that the Company has reasonably satisfied this reporting requirement.

3. Docket No. E002/S-17-767

Order Point 6 of the Commission's June 20, 2018 Order in Docket No. E,G002/S-17-767 (the 17-767 Order) imposed several permanent reporting requirements on NSP-MN for future capital structure petitions. The Department briefly addresses each of those reporting requirements below.

a.) Planned Project Investments

Order Point 6a of the 17-767 Order requires the Company to include in its capital structure Petitions a schedule showing, for various time periods, planned investments for major capital projects. NSP-MN included the required information in Attachment N to its Petition. The Department concludes that the Company reasonably satisfied this reporting requirement and provides additional discussion of Attachment N below.

b.) Utility Money Pool Activity

Order Point 6b of the 17-767 Order requires the Company to include in its capital structure filings a summary of its activity in the Utility Money Pool it operates with its utility affiliates. NSP-MN included the required information in Attachment E to its Petition. The Department concludes that the Company reasonably satisfied this reporting requirement.

² ROE approved in the Commission's September 27, 2019 Order in Docket No. E002/M-17-797. All other elements are from the Commission's June 12, 2017 Order in Docket No. E002/GR-15-826 at pg. 11.

c.) Multi-year Credit Agreement

Order Point 6c of the 17-767 Order requires the Company to include in its capital structure filings a discussion detailing how its multi-year credit agreement is used and for what purposes. NSP included the required information in Attachment C to its Petition, which states that the Company has not borrowed under its multi-year credit agreement since December 2008. The Department concludes that the Company reasonably satisfied this reporting requirement.

d.) Comparison to Bond Issuances by Other Utilities

Order Point 6c of the 17-767 Order also requires the Company to include in its capital structure filings, for any period in which NSP-MN sells bonds, a comparison over a six-month period of the results of all bond issuances by other utilities. The Company included this information in Attachment I, Part 3, to its Petition. The Department concludes that the Company reasonably satisfied this reporting requirement.

e.) Compliance with Commission-Imposed Restrictions on Utility Money Pool Activity

The Commission's July 9, 2004 Order in Docket No. E,G002/AI-04-100 requires the Company to only borrow from the Utility Money Pool if it cannot borrow from a different source at a lower rate, and not to lend to the Utility Money Pool if the return offered is lower than that offered by alternative short-term investments. Order Point 6d of the 17-767 Order requires the Company to demonstrate compliance with these requirements by providing a comparison of actual borrowing and lending rates from the Utility Money Pool to alternative rates. Attachment E to the Company's Petition includes the required information.

The Department notes that in Attachment E, the Company selected the Prime Rate, which is representative of the interest rate at which large banks are willing to lend to their most creditworthy customers, as the alternative borrowing rate. In its response to Department Information Request (IR) No. 10, however, NSP-MN confirmed that under normal circumstances, commercial paper is the most likely alternative to borrowing via the Utility Money Pool, not bank loans. The Prime Rate is usually higher than borrowing rates on commercial paper. Also in its response to Department IR No. 10, the Company provided its average daily commercial paper balances, and the average daily interest rates on that paper.

Table 3 below summarizes the Company's average actual borrowing costs using the Utility Money Pool, commercial paper, and the Prime Rate. This information confirms that the Utility's Money Pool had the lowest borrowing rates.

Table 3
Comparison of NSP-MN's
Costs of Short-Term Borrowing from Various Financing Sources³

Month	Utility Money Pool Borrowing Rate	Prime Rate	Avg. Rate on NSP-MN's Commercial Paper	Utility Money Pool Lowest Option?
	[a]	[b]	[c]	[d]
Sep 2018	1.99%	5.25%	2.20%	Yes
Oct 2018	2.11%	5.52%	2.37%	Yes
Nov 2018	2.25%	5.25%	2.41%	Yes
Dec 2018	2.30%	5.50%	2.77%	Yes
Jan 2019	2.50%	5.50%	2.76%	Yes
Feb 2019	2.45%	5.50%	2.68%	Yes
Mar 2019	2.44%	5.50%	2.61%	Yes
Apr 2019	2.46%	5.50%	2.55%	Yes
May 2019	2.42%	5.50%	2.56%	Yes
Jun 2019	2.41%	5.50%	2.53%	Yes
Jul 2019	2.32%	5.25%	2.51%	Yes
Aug 2019	2.20%	5.25%	2.35%	Yes

Sources:

[a] & [b]: Petition, Attachment E

[c]: Derived from data provided in Response to DOC IR No. 10

f.) Cost-Competitiveness of Bond Issuances

Order Point 6e of the 17-767 Order requires the Company to provide in its capital structure filings evidence demonstrating that any bond issuances over the preceding year were cost-competitive, including at a minimum a comparative analysis to other bonds issuances.

NSP-MN issued \$600 million of long-term debt in September 2019. Attachment I, Part 3, provides a list of bonds issued during the first nine months of 2019, and demonstrates that NSP-MN's issuance was competitively priced. Based on this information, the Department concludes that the Company has complied with Order Point 6e of the 17-767 Order.

³ See Department Attachment 2.

g.) Risk-Management Instruments

Order Point 6f of the 17-767 Order requires the Company to provide in its capital structure filings a summary of its use of risk-management instruments and the resulting effects on ratepayers. On page nine of its Petition, NSP-MN reported that it has not entered into and does not have any outstanding risk management instruments. The Department concludes that the Company has reasonably complied with this reporting requirement.

III. DEPARTMENT ANALYSIS

A. ANALYSIS OF NSP-MN'S PROPOSED 2020 CAPITAL STRUCTURE

Minn. Stat. §216B.49, subd. 3 states that:

It is unlawful for any public utility organized under the laws of this state to offer or sell any security or, if organized under the laws of any other state or foreign country, to subject property in this state to an encumbrance for the purpose of securing the payment of any indebtedness unless the security issuance of the public utility is first approved by the commission, either as an individual issuance or as one of multiple possible issuances approved in the course of a periodic proceeding reviewing the utility's proposed sources and uses of capital funds. Approval by the commission must be by formal written order.

Further, Minn. Stat. §216B.49, subd. 4 states in part that:

If the commission shall find that the proposed security issuance is reasonable and proper and in the public interest and will not be detrimental to the interests of the consumers and patrons affected thereby, the commission shall by written order grant its permission for the proposed public financing.

Based on the above statutes, the Department discusses the reasonableness of the NSP-MN's proposed 2020 capital structure, as well as its other associated requests.

1. Reasonableness of NSP-MN's Proposed Capital Structure

As shown in Table 1 above, NSP-MN's requested 2020 capital structure consists of a total capitalization of \$12.6 billion, consisting of 52.3 percent common equity, 1.8 percent short-term debt, and 45.8 percent long-term debt. The proposed capital structure represents NSP-MN's forecast of its capital structure as of December 31, 2020 and reflects assumed long-term debt issuances of up to \$550 million and equity infusions of \$497 million.

To check the reasonableness of NSP-MN's proposed capital structure, the Department compared it to the capital structures of other electric utilities that are risk-comparable to NSP-MN, as measured by their credit ratings. This analysis is included in Department Attachment 3. As shown, the equity ratios of comparably rated electric utilities range from 25.62 percent to 69.29 percent, with an average of 43.51 percent. NSP-MN's proposed equity ratio of 52.3 percent is higher than the average, but well within the range of comparable electric utilities, as are the Company's proposed debt ratios.

NSP-MN's higher-than-average equity ratio allows the Company to issue long-term debt at lower interest rates. Additionally, between rate cases the Company has an incentive to have an equity ratio that minimizes its overall total capital cost. For all these reasons, the Department concludes that the Company's proposed capital structure is reasonable for purposes of this filing.

2. Proposed Contingencies

a.) Equity Ratio Contingency Range

NSP-MN requested an equity ratio contingency range 47.07 percent to 57.53 percent, or 10 percent above and below its projected end-of-year 2020 equity ratio of 52.3 percent. The Department notes that the plus and minus 10 percent range has been in place for over a decade and appears to have worked well during that time. Therefore, the range has historically served its purpose of providing NSP-MN with adequate short-term financial flexibility while not subjecting ratepayers to undue risk. Particularly as NSP-MN has maintained an actual equity ratio within the midpoint of this range, the Department sees no reason for a change in course and therefore recommends that the Commission continue to approve the +10 percent range.

b.) Short-Term Debt Ratio Contingency Range

Like the equity ratio range, the 15 percent cap on short-term debt has been in effect for over a decade and has historically worked to serve its purpose of providing NSP-MN with adequate short-term financial flexibility while not unduly risking harm to ratepayers. Because NSP-MN has managed its capital structure such that its short-term debt ratio is generally significantly lower than 15 percent, and the Company continues to be rated as investment grade, the Department sees no reason for a change in course and therefore recommends that the Commission continue to approve the 15 percent cap.

c.) Long-Term Debt Contingency

As in past capital structure petitions, the Company did not propose a specific long-term debt ratio contingency range, but rather proposed to effectively allow its equity and short-term debt contingency ranges to limit its long-term debt ratio. If the Company reaches its maximum proposed equity and short-term debt ratios, (57.53 percent and 15.00 percent, respectively), it will have a long-term debt ratio of 27.47 percent. If it reaches its minimum equity and short-term debt ratios (47.07 percent and zero, respectively) it will have a long-term debt ratio of 52.93 percent. Again, because this system has been in place for over a decade and appears to have worked well during the time, the Department recommends no changes.

d.) Total Capitalization

As shown in Table 1 above, NSP-MN requested a total capitalization of \$13.2 billion, including a contingency of \$596 million, or 4.7 percent. This proposed contingency would allow adequate financial flexibility to the Company to deal with unexpected financing needs while also providing the Commission with sufficient oversight of its total capitalization. Further, if the Company exercises its ability to increase its total capitalization based on its approved contingency, it would still have to demonstrate to the Commission that its actions were prudent and reasonable before it would be allowed to recover any associated costs. For these reasons, the Department concludes that NSP-MN's proposed capitalization contingency is reasonable and recommends that the Commission approve it.

B. FLEXIBILITY TO ISSUE SECURITIES SUBJECT TO APPROVED CONTINGENCY RANGES

In its Petition, NSP-MN requested the flexibility to issue securities provided that the Company remains within the contingency ranges or does not exceed them for more than 60 days. In the one page Summary of Filing appended to the Company's Petition, NSP-MN stated:

The Company requests authorization to make one or more issues of securities with the provision that these parameters will not be exceeded for more than 60 days without notifying the Commission.

As specified in Minn. Stat. § 216B.49, subd. 4, to approve a security issuance, the Commission must find that the issuance is in the public interest, which requires that the types of capital issued (common equity, short-term debt, long-term debt, etc.) bear a reasonable proportion to each other and to the value of the property, and that the issuance would not harm ratepayers. The Department concludes that NSP-MN's request would satisfy these criteria if modified to require Commission preapproval to exceed the 60-day grace period. Otherwise, NSP-MN would be able to go outside the bounds of its allowed capital structure for an indefinite amount of time without Commission approval. Therefore, the Department recommends that the Commission approve NSP-MN's request as modified to require preapproval to exceed the 60-day grace period.

C. CONTINUANCE OF THE VARIANCE FOR THE MULTI-YEAR CREDIT AGREEMENT

NSP-MN requested a continuing variance from Minn. R. 7825.1000, subp. 6 for authority to treat direct borrowings under its multi-year credit facility (MYCF) as short-term debt. Minn. R. 7825.1000, subp. 6 defines short-term securities as:

any unsecured security with a date of maturity of no more than one year from the date of issuance; and containing no provisions for automatic renewal or "roll over" at the option of either the obligee or obligor.

In order to classify direct borrowings under its MYCF as short-term debt, the Commission would have to vary this rule for NSP-MN. Per Minn. R. 7829.3200, subp. 1, the Commission can only grant the variance if the following three requirements are met:

1. enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule,
2. granting the variance would not adversely affect the public interest, and
3. granting the variance would not conflict with standards imposed by law.

The Department agrees with NSP-MN that these requirements are met. NSP-MN's current multi-year credit agreement resembles traditional short-term debt instruments and classifying multi-year credit agreements as long-debt could cause credit-rating agencies to react unfavorably, thus imposing an excessive burden on NSP-MN and hurting ratepayers. In addition, classifying multi-year credit agreements as short-term debt would not conflict with any standards imposed by law. Therefore, the Department recommends that the Commission continue to vary Minn. Rules 7825.1000, subp. 6, and allow NSP-MN to treat borrowing under multi-year credit agreements as short-term debt. The Department also notes that the Commission has made the same variance and allowance for all approvals of NSP-MN's capital structure since 2005.

D. PERMISSION TO USE RISK-MANAGEMENT INSTRUMENTS

NSP-MN requested continued permission to use risk-management instruments that qualify for hedge accounting treatment under Accounting Standard Codification No. 815 (e.g. U.S. Treasury locks and interest rate swaps) to manage price, duration, or interest rate risk on securities. The Company stated that any such activity would be consistent with the policies of NSP-MN's parent company, Xcel Energy Inc., with required officer approvals.

The Department agrees with NSP-MN that risk-management instruments such as interest rate swaps can benefit ratepayers as long as NSP-MN follows prudent corporate guidelines in its usage of such instruments and allows the Commission sufficient oversight. As noted above, the Company is already required to report on its use of risk-management instruments per the Commission's 17-767 Order. Therefore, the Department recommends that the Commission approve NSP-MN's request with the reporting requirements recommended below.

E. PERMISSION TO ENTER INTO CERTAIN OTHER FINANCINGS

In the Introduction to its Petition, NSP-MN specifically requested Commission approval to have discretion to enter into financings to replace outstanding long-term debt instruments with less expensive securities after considering the debt issuance expenses and amortization of redemption premiums, and to enter into tax-exempt financings for pollution control construction programs. As both types of financings would reduce costs to ratepayers, the Department recommends that the Commission grant NSP-MN's request. However, to ensure adequate oversight, the Department also recommends that the Commission require NSP-MN's next capital structure filing to report on such financings and their impact on ratepayers.

F. ADDITIONAL DISCUSSION

1. 2019 Issuance

Attachment H to the Company's Petition identified a \$600 million bond issuance in September 2019. Attachment I to the Company's Petition contains certain legal documents related to the issuance, as well as Transaction Overview, summarizing the results of the issuance. The Department notes that the Transaction Overview identifies the bonds issued as "green" bonds. A "green" bond is a first mortgage bond that includes a stipulation that the proceeds must be used for Eligible Green Expenditures, which are defined in the Prospectus Supplement as follows:⁴

Eligible Green Expenditures expenditures made or to be made, as the case may be, during the period from January 1, 2018 to June 1, 2020, and used in the development, construction and operation of, as well as transmission infrastructure to support, our wind energy projects. Such expenditures include capital expenditures which were previously financed with our general funds, including commercial paper.

Within one year of the issuance, the Company is required to report on its website that an amount equal to the net proceeds of the issuance was used for Eligible Green Expenditures. The Company is also required to obtain an attestation report from an independent accountant to certify that report.⁵

In its response to Department Information Request (IR) No. 2, the Company explained its decision for issuing a green bond as opposed to a more standard first mortgage bond as follows:⁶

The "Green" designation provides benefits to both the Company and its ratepayers because it allows the Company to attract different and/or additional investors, and thereby increases the Company's ability to access capital markets at favorable rates, potentially resulting in lower financing costs to customers.

For example, the Green bond issued by the Company in September 2019 was record-setting at the time of issuance for the Company and the entire utility sector for having the lowest interest rate on a 30-year bond in history. We note that it is difficult to determine whether this issuance was record-setting because of it being green or the favorable interest rate environment that currently exists. That said, the Company has noted a shift in capital markets as more and more investors are becoming "green-conscious." As such, the Company believes that the "green" designation of

⁴ Petition, Attachment I, Part 2, page 8.

⁵ Petition, Attachment I, Part 2, page 8.

⁶ Department Attachment No. 4.

the bond likely helped attract a more diverse base of investors and contributed to the success of accessing the markets at such a favorable rate.

The Department agrees that, while it is not possible to determine how much the “green” aspect of the issuance was a driving factor behind the low cost of the bond, at the very least the green designation certainly does not appear to have had negative impacts the cost of the debt.

The Department reviewed the materials related to the issuance provided in Attachment I in order to determine whether the “green” aspects of the issuance creates any additional costs or risks for ratepayers. During its review, the Department did not see any language describing any penalties if the Company failed to meet its obligations to make Eligible Green Expenditures in an amount equal to the net proceeds of the issuance. The Prospectus Supplement simply states that if the net proceeds are not fully allocated within one year of issuance, NSP-MN is required to provide updates annually, and provide annual attestations from an independent accountant, until the net proceeds are fully allocated.⁷

In its response to Department Information Request (IR) No. 2, the Company also did not identify any potential penalties for non-compliance, stating:⁸

Due to the Company’s significant investment in wind and other renewables during the period from January 1, 2018 to June 1, 2020, the Company does not anticipate any significant risk associated with using the total net proceeds on such Eligible Green Expenditures. As such, the Company should not be subject to any penalties or risk associated with issuing the green first mortgage bond as compared to a standard first mortgage bond.

Additionally in its response to Department IR No. 2, the Company stated that the green bond issuance does not create any material additional costs associated with ongoing reporting requirements. The Company stated that the only additional costs associated with the bond’s reporting requirements are the costs of obtaining the required attestation from an independent accountant, which the Company estimates will be \$40,000, which will be included in the cost of the debt.

Based on the above, the Department concludes that NSP-MN’s decision to issue green bonds as opposed to more standard first mortgage bonds appears to have been reasonable. However, the Company will bear the burden in future rate cases to demonstrate the reasonableness of any additional fees or costs associated with the bonds before it can recover those costs from ratepayers.

⁷ Petition, Attachment I, Part 2, page 8.

⁸ Department Attachment 4.

2. Planned Investments

Attachment N to the Company's Petition indicates that its projected 2019 investments decreased by \$546 million from its estimate for 2019 from its prior capital structure Petition in Docket No. E,G002/S-18-654. Additionally, the Company's projected 2020 investments increased by \$733 million, from \$1,296 million in Docket No. E,G002/S-18-654 to \$2,029 million in the current docket.

In its response to Department IR No. 5, the Company explained that most of the decrease in 2019 and most of the increase in 2020 are attributable to delays in payments for wind investments that were initially expected to take place in 2019, but are now expected to occur in 2020. The increase in planned 2020 investments also reflects the incremental expenditures for Jeffers Wind, Community Wind North, and the Mower Wind Facility.⁹ That incremental spend is partially offset by a reduction in size and cost of the Crowned Ridge Wind project.

IV. CONCLUSION AND RECOMMENDATIONS

The Department recommends that the Commission:

1. Approve NSP-MN's requested 2020 capital structure and contingencies, effective until the Commission issues an order on NSP-MN's 2021 capital structure;
2. Allow NSP-MN to issue securities provided that the Company remains within the approved contingencies or does not go outside the approved contingencies for more than 60 days without the Commission's preapproval;
3. Continue to allow NSP-MN to use risk-management instruments that qualify for hedge accounting treatment under Accounting Standard Codification No. 815;
4. Continue to allow NSP-MN to treat borrowing under multi-year credit agreements as short-term debt, by varying Minn. Rules part 7825.10000, subpart 6;
5. Allow NSP-MN to enter into financings to replace outstanding long-term debt instruments with less expensive securities, and tax-exempt financings for pollution control construction programs, provided NSP-MN's next capital structure filing reports on any such financings entered into and their effect on ratepayers.
6. Require NSP-MN to continue to follow the informational reporting requirements imposed in Order Point 6 of the Commission's June 20, 2018 Order in Docket No. E,G002/S-17-767.

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⁹ Department Attachment 5.

NORTHERN STATES POWER COMPANY - MINNESOTA

2020 Capital Structure Financing Assumptions
(Amounts in Millions)

	Jul-Dec 2019	Jan-Dec 2020
<u>Sources:</u>		
<u>Financings: Long Term</u>		
Equity Infusions	\$139	\$358
Long-Term Debt Issuances	\$600 (a)	\$550 (b)
Subtotal	<u>\$739</u>	<u>\$908</u>
<u>Uses:</u>		
<u>Retirements/Redemptions</u>		
Long-Term Debt	<u>\$0</u>	<u>\$300</u>
Subtotal	<u>\$0</u>	<u>\$300</u>
<u>Net Financings</u>		
Equity Infusions	\$139	\$358 (c)
Long-Term Debt	<u>\$600</u>	<u>\$250</u>
Total	<u><u>\$739</u></u>	<u><u>\$608</u></u>
<u>Uses:</u>		
<u>2020 Utility Capital Requirements (d)</u>		
Energy Supply		\$1,198
Nuclear		\$145
Distribution		\$395
Transmission		\$127
Other		<u>\$164</u>
Total-NSP Minnesota		<u>\$2,029</u>
<u>Short-Term Debt/Internal Funds</u>		<u><u>\$1,421 (e)</u></u>

- (a) The Company issued a bond in September 2019 of \$600 million.
- (b) The Company forecasts a bond issuance in 2nd Quarter 2020 of up to \$550 million.
- (c) To maintain target capital structure ratios, the Company receives planned equity infusions from its parent company, Xcel Energy Inc.
- (d) 3rd Quarter 2019 Budget Information (greater detail provided in Attachment N).
- (e) Capital expenditures will be financed with a combination of the \$608 million net financings, and \$1.4 billion short-term debt/internal funds.
- Please see Attachment M for monthly forecast source and use, and Attachment N for capital expenditure detail.

Northern States Power Company - Minnesota

Docket No. E,G002/S-19-_____

Attachment H

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Issuance and Use of Funds from the Prior Year (2018)

Comments:

- 1) In 2018 the Company did not issue any FMBs.
- 2) The Company received \$119.8 million in equity from its parent during 2018.
This equity is used to re-balance the capital structure to maintain its target equity ratio, repay short term debt and fund utility capital expenditures.
- 3) The Company did not have any long-term debt retirements in 2018.
- 4) The Company spent approximately \$1.2 billion on capital expenditures in 2018.
- 5) The Company used approximately \$1.1 billion internal funds/short-term debt to help finance capital expenditures.

Amounts in Millions	2018
Financings	<u>Year</u>
<u>Issuance: Long Term Financings</u>	
1) Long-Term Debt Issuances	\$0.0
2) Equity Infusions	<u>\$119.8</u>
Subtotal	\$119.8
<u>Use: Retirements/Redemptions</u>	
3) Long-Term Debt	\$0.0
<u>Net Financings</u>	\$119.8
<u>2018 Utility Capital Requirements</u>	
Energy Supply	\$406
Nuclear	\$232
Distribution	\$342
Transmission	\$123
Other	<u>\$134</u>
4) Total-NSP Minnesota	\$1,237
5) Short-Term Debt/Internal Funds	<u>\$1,117</u>

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Xcel Energy
Docket No.: E,G002/S-19-662
Response To: MN Department of Commerce
Requestor: Craig Addonizio
Date Received: December 2, 2019

Information Request No. 10

Question:

Topic: Money Pool Borrowings, Alternative Interest Rate
Reference(s): Petition, Attachment E, page 4

Attachment E, page 4 of NSP's Petition reports and alternative borrowing rate of 5.25%-5.50% over the period Sept. 2018 –Aug. 2019, based on the Fed Prime Rate.

- a. Please explain whether the Fed Prime Rate was selected as the alternative borrowing rate because it is one of the possible borrowing rates under NSP's multi-year credit facility.
- b. Please explain whether, in normal circumstances, the multi-year credit facility or commercial paper is the most likely alternative to borrowing via the money pool.
- c. Please provide NSPMN's daily commercial paper balances over the period Sept. 2018 –Aug. 2019 in a format similar to that used in Attachment E, pages 1-3.
- d. Please provide the daily interest rates on NSPMN's outstanding commercial paper during the period Sept. 2018 –Aug. 2019.

Response:

- a. The Fed Prime Rate is not the rate designated by the multi-year credit facility. However, the Fed Prime Rate was selected as the alternative borrowing rate because it is the rate that the banks who are included in NSP's multi-year credit facility would charge any borrower.
- b. Commercial paper is the most likely alternative to borrowing via the utility money pool.
- c. Please see Attachment A to this response.
- d. Please see Attachment A to this response.

Preparer: Eric Gray
Title: Director, Cash Management
Department: Treasury
Telephone: 612-215-5363
Date: December 11, 2019

NSPMN - Sep. 2018 to Aug. 2019 Daily Outstanding Commercial Paper (CP) Balances (\$ in millions)

Days	Outstanding CP Sep-18	Outstanding CP Oct-18	Outstanding CP Nov-18	Outstanding CP Dec-18	Outstanding CP Jan-19	Outstanding CP Feb-19	Outstanding CP Mar-19	Outstanding CP Apr-19	Outstanding CP May-19	Outstanding CP Jun-19	Outstanding CP Jul-19	Outstanding CP Aug-19
01	23	25	129	64	150	201	73	0	0	134	210	177
02	23	15	129	64	210	201	73	0	0	134	203	178
03	23	0	129	67	194	201	73	0	0	144	194	178
04	15	63	129	85	188	195	63	0	0	139	194	178
05	0	66	66	58	188	186	55	0	0	131	196	166
06	0	66	47	28	188	164	35	0	0	123	196	158
07	0	66	32	30	183	149	20	0	0	137	196	144
08	0	66	27	30	173	159	32	0	0	137	193	136
09	0	43	39	30	168	159	32	68	0	137	199	159
10	0	0	39	43	156	159	32	48	0	147	187	159
11	0	0	39	16	155	145	27	27	0	142	284	159
12	0	46	39	0	155	138	11	26	0	135	279	155
13	0	46	42	6	155	111	0	26	0	138	279	0
14	0	46	28	2	164	100	0	26	28	160	279	0
15	0	43	99	2	163	132	0	27	32	160	277	0
16	0	19	79	2	222	132	0	0	14	160	267	0
17	0	6	79	43	197	132	0	0	21	164	238	0
18	0	0	79	55	202	132	0	0	21	145	225	0
19	0	0	62	0	202	102	0	0	21	142	246	0
20	0	12	63	19	202	109	0	0	29	148	246	0
21	0	12	46	43	202	83	0	0	48	174	246	0
22	0	73	46	43	185	93	0	0	55	174	246	0
23	0	95	23	43	257	93	0	0	61	174	250	0
24	0	81	23	110	254	93	0	0	71	196	241	0
25	0	110	23	110	317	123	0	0	71	219	279	0
26	0	127	71	196	317	124	0	1	71	226	184	0
27	0	127	64	198	317	71	0	1	71	177	184	15
28	24	127	77	176	316	63	0	1	103	194	184	0
29	24	126	34	176	305	0	0	0	102	194	184	0
30	24	128	64	176	291	0	0	0	88	194	174	5
31		121		150	199	0	0	0	134		177	5

NSPMN - Sep. 2018 to Aug. 2019 Daily Interest Rates on Outstanding Commercial Paper (CP) (%)

Days	CP Rate Sep-18	CP Rate Oct-18	CP Rate Nov-18	CP Rate Dec-18	CP Rate Jan-19	CP Rate Feb-19	CP Rate Mar-19	CP Rate Apr-19	CP Rate May-19	CP Rate Jun-19	CP Rate Jul-19	CP Rate Aug-19
01	2.13	2.34	2.39	2.51	2.97	2.71	2.61	-	-	2.57	2.52	2.43
02	2.13	2.34	2.38	2.51	2.91	2.71	2.61	-	-	2.57	2.52	2.39
03	2.13	-	2.38	2.50	2.85	2.71	2.61	-	-	2.58	2.52	2.39
04	2.03	2.34	2.38	2.53	2.87	2.70	2.61	-	-	2.53	2.52	2.39
05	-	2.34	2.39	2.50	2.87	2.71	2.61	-	-	2.54	2.52	2.40
06	-	2.34	2.36	2.50	2.87	2.70	2.60	-	-	2.55	2.52	2.36
07	-	2.34	2.36	2.46	2.81	2.71	2.60	-	-	2.54	2.52	2.34
08	-	2.34	2.36	2.46	2.79	2.66	2.60	-	-	2.54	2.52	2.35
09	-	2.34	2.36	2.46	2.70	2.66	2.60	2.55	-	2.54	2.52	2.30
10	-	-	2.36	2.46	2.73	2.66	2.60	2.55	-	2.52	2.52	2.30
11	-	-	2.36	2.46	2.73	2.67	2.60	2.55	-	2.53	2.51	2.29
12	-	2.32	2.36	-	2.73	2.67	2.60	2.55	-	2.52	2.51	-
13	-	2.32	2.36	2.45	2.73	2.70	-	2.55	2.50	2.52	2.51	-
14	-	2.32	2.36	2.45	2.71	2.71	-	2.55	2.50	2.52	2.50	-
15	-	2.33	2.39	2.45	2.72	2.67	-	2.55	2.50	2.52	2.50	-
16	-	2.35	2.42	2.45	2.70	2.67	-	-	2.50	2.52	2.50	-
17	-	2.35	2.42	2.45	2.71	2.67	-	-	2.50	2.52	2.51	-
18	-	-	2.42	2.45	2.75	2.67	-	-	2.50	2.53	2.51	-
19	-	2.35	2.42	-	2.75	2.67	-	-	2.50	2.53	2.50	-
20	-	2.35	2.42	2.71	2.75	2.66	-	-	2.50	2.53	2.50	-
21	-	2.35	2.42	2.71	2.75	2.67	-	-	2.50	2.53	2.50	-
22	-	2.37	2.42	2.71	2.75	2.68	-	-	2.55	2.53	2.50	-
23	-	2.37	2.44	2.71	2.73	2.68	-	-	2.56	2.53	2.50	-
24	-	2.38	2.44	2.84	2.73	2.68	-	-	2.57	2.53	2.50	-
25	-	2.37	2.44	2.84	2.72	2.66	-	-	2.57	2.52	2.50	-
26	-	2.39	2.44	2.86	2.72	2.66	-	2.59	2.57	2.52	2.50	-
27	-	2.39	2.44	2.92	2.72	2.68	-	2.59	2.57	2.52	2.50	-
28	2.30	2.39	2.50	2.95	2.72	2.69	-	2.59	2.60	2.52	2.50	-
29	2.30	2.38	2.57	2.95	2.71	-	-	-	2.57	2.52	2.50	-
30	2.30	2.39	2.51	2.95	2.70	-	-	-	2.58	2.52	2.49	2.24
31		2.39		2.97	2.72		-		2.57		2.49	2.24

Capital Structure of Electric Utilities (SIC Codes 4911 and 4931)
With Credit Ratings of BBB to A+

Company	Ticker	SIC Code	Credit Rating	Reporting Period		Notes Payable & Short-Term Borrowings	Current Portion		Non-Current Debt	Non-Current Capital Leases	Trust		Total Common Equity	Preferred Equity	Total Equity Capitalization	Short-Term Debt Ratio	Long-Term Debt Ratio	Common Equity Ratio	Other Equity Ratio	Total
				(Most Recent Fiscal Year)	(Fiscal Year)		Long-Term Debt	Current Portion Capital Leases			Non-Current Preferred Securities	Minority Interest								
ALLETE, Inc.	ALE	4931	BBB+	2018	-	-	58	-	1,429	-	-	-	2,156	-	2,156	0.00%	40.80%	59.20%	0.00%	100.00%
Alliant Energy Corporation	LNT	4931	A-	2018	441	-	257	-	5,246	-	-	200	4,586	-	4,786	4.11%	51.29%	42.74%	1.86%	100.00%
American Corporation	AEE	4931	BBB+	2018	597	-	573	7	7,596	263	-	142	7,631	-	7,773	3.55%	50.21%	45.40%	0.84%	100.00%
American Electric Power Co	AEP	4911	A-	2018	1,910	-	1,699	56	21,846	234	-	100	19,028	-	19,129	4.28%	52.91%	42.59%	0.22%	100.00%
Avangrid, Inc.	AGR	4911	BBB+	2018	587	-	394	-	5,414	-	-	299	15,104	-	15,403	2.69%	26.68%	69.39%	1.37%	100.00%
Avista Corporation	AVA	4931	BBB	2018	190	-	105	3	1,736	55	52	1	1,773	-	1,774	4.85%	49.82%	45.31%	0.02%	100.00%
Black Hills Corporation	BKH	4911	BBB+	2018	186	-	6	-	2,951	-	106	2,182	-	-	2,287	3.42%	54.45%	40.18%	1.95%	100.00%
CenterPoint Energy, Inc.	CNP	4931	BBB+	2018	-	-	482	-	8,682	-	-	-	6,318	1,740	8,058	0.00%	53.21%	36.69%	10.10%	100.00%
CMS Energy Corporation	CMS	4931	BBB+	2019	90	-	1,124	15	11,951	113	-	37	5,018	-	5,055	0.49%	71.96%	27.35%	0.20%	100.00%
Consolidated Edison, Inc.	ED	4931	A-	2018	2,566	-	650	-	17,495	-	-	113	16,726	-	16,839	6.83%	48.32%	44.54%	0.30%	100.00%
Dominion Energy, Inc.	D	4911	BBB+	2018	407	-	3,650	-	27,830	-	3,430	1,941	20,107	-	22,048	0.71%	60.86%	35.05%	3.38%	100.00%
DTE Energy Company	DTE	4931	BBB+	2019	828	-	682	38	14,778	138	-	164	11,672	-	11,836	2.81%	56.99%	39.64%	0.56%	100.00%
Duke Energy Corporation	DUK	4931	A-	2018	3,410	-	3,236	170	50,352	771	-	17	43,817	-	43,834	3.35%	53.58%	43.05%	0.02%	100.00%
Edison International	EIX	4911	BBB	2018	720	-	79	-	14,632	-	-	2,193	10,459	-	12,652	2.56%	52.38%	37.24%	7.81%	100.00%
El Paso Electric Company	EE	4911	BBB	2018	49	-	99	-	1,286	-	-	-	1,164	-	1,164	1.89%	53.31%	44.80%	0.00%	100.00%
Energy, Inc.	ETR	4911	BBB+	2018	1,942	-	650	2	15,518	20	-	219	8,844	-	9,064	7.14%	59.53%	32.52%	0.81%	100.00%
EverSource Energy	ES	4931	A-	2018	1,104	-	741	-	6,687	-	-	(38)	10,028	-	9,991	5.96%	40.10%	54.14%	-0.20%	100.00%
Exelon Corporation	EXC	4911	BBB+	2018	910	-	1,328	21	34,060	15	390	2,06	30,764	-	33,070	1.03%	52.23%	43.72%	0.58%	100.00%
FirstEnergy Corp.	FE	4911	BBB	2019	1,000	-	380	-	19,618	-	-	-	6,975	-	6,975	3.57%	71.49%	24.93%	0.00%	100.00%
IDACORP, Inc.	IDA	4911	A-	2018	-	-	-	-	1,835	-	-	5	2,370	-	2,376	0.00%	43.58%	56.30%	0.13%	100.00%
NextEra Energy, Inc.	NEE	4911	BBB	2019	2,916	-	2,124	-	37,543	20	-	4,942	37,005	-	41,847	3.45%	46.98%	43.83%	5.73%	100.00%
NorthWestern Corporation	NWE	4931	BBB	2018	-	-	250	2	2,102	-	-	-	1,942	-	4,005	0.00%	52.24%	47.76%	0.00%	100.00%
OGE Energy Corp.	OGE	4931	BBB+	2018	-	-	0	-	2,897	-	-	-	4,005	-	4,005	0.00%	44.00%	56.00%	0.00%	100.00%
Other Tail Corporation	OTTR	4911	BBB	2018	19	-	0	-	590	-	-	-	729	-	729	1.39%	44.12%	49.44%	1.19%	100.00%
Pinnacle West Capital Corp	PNW	4911	A-	2018	76	-	500	-	4,638	-	-	126	5,223	-	5,349	0.72%	48.64%	49.44%	1.19%	100.00%
PNM Resources, Inc.	PNM	4911	BBB+	2018	236	-	0	-	2,670	-	-	76	1,688	-	1,764	5.05%	57.17%	36.15%	1.62%	100.00%
Portland General Electric Co	POR	4911	BBB+	2018	-	-	304	2	2,178	47	-	-	2,506	-	2,506	0.00%	50.25%	49.75%	0.00%	100.00%
PPL Corporation	PPL	4911	A-	2018	1,430	-	534	-	20,157	-	-	-	11,657	-	11,657	4.23%	61.26%	34.51%	0.00%	100.00%
Public Service Enterprise Gr	PEG	4931	BBB+	2018	1,016	-	1,294	-	13,168	-	-	-	14,377	-	14,377	3.40%	48.44%	48.16%	0.00%	100.00%
Sempra Energy	SRE	4931	BBB+	2018	2,079	-	1,676	-	20,376	1,419	-	2,110	14,880	2,258	19,248	4.64%	52.35%	33.22%	9.75%	100.00%
The Southern Company	SO	4911	A-	2018	2,915	-	3,174	24	40,357	173	206	4,607	24,723	-	29,330	3.83%	57.57%	32.43%	6.05%	100.00%
Unitil Corporation	UTL	4931	BBB+	2019	59	-	20	1	438	3	-	0	377	-	377	6.53%	51.46%	41.99%	0.02%	100.00%
WEC Energy Group, Inc.	WEC	4931	A-	2019	831	-	693	-	11,211	-	-	141	10,113	-	10,255	3.61%	51.78%	43.99%	0.61%	100.00%
Xcel Energy Inc.	XEL	4931	A-	2018	1,038	-	406	-	15,803	-	-	-	12,222	-	12,222	3.52%	55.00%	41.47%	0.00%	100.00%
Minimum																7.14%	71.96%	69.29%	10.10%	
Average																2.95%	51.90%	43.49%	1.66%	
Maximum																0.00%	26.64%	24.93%	-0.20%	

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Xcel Energy Information Request No. 2
Docket No.: E,G002/S-19-662
Response To: MN Department of Commerce
Requestor: Craig Addonizio
Date Received: November 5, 2019

Question:

Topic: September 2019 Green First Mortgage Bond Issuance
Reference(s): Petition, Attachment I

- a. Please explain generally why NSP decided to issue “Green” bonds as opposed to more standard first mortgage bonds.
- b. Please explain whether the “Green” designation provides any benefits to either the Company or its ratepayers.
- c. Please describe all obligations created by the “Green” designation of Xcel’s September 2019 bond issuance, and describe any penalties Xcel might face if it does not meet those obligations.
- d. Please explain whether the “Green” designation of Xcel’s 2019 bond issuance creates any additional costs associated with ongoing reporting requirements and who will pay for those costs.
- e. If any presentations related to this Green Bond issuance were provided to potential investors prior to its issuance (e.g. a “roadshow”), please provide copies of any presentation materials.

Response:

- a. A “green” bond is a first mortgage bond that includes a stipulation that the proceeds must be used for Eligible Green Expenditures. NSP (or the “Company”) decided to issue a “green” first mortgage bond as opposed to a standard first mortgage bond to finance various Eligible Green Expenditures at favorable coupon rates while also diversifying its investor base. Eligible Green Expenditures are expenditures made or to be made, for the September 2019 bond issuance, during the period from January 1, 2018 to June 1, 2020, and used in the development, construction and operation of, as well as transmission infrastructure to support, our wind energy projects.

Green bonds attract different and/or additional investors as compared to standard first mortgage bonds. A growing number of investors are looking to invest in green projects or renewables, and some investors even stipulate that they will only invest in the utility industry through green bonds. Attracting such additional and/or diversified investors better positions the Company to access capital markets at favorable rates in order to support its investment in renewable resources.

- b. The “Green” designation provides benefits to both the Company and its ratepayers because it allows the Company to attract different and/or additional investors, and thereby increases the Company’s ability to access capital markets at favorable rates, potentially resulting in lower financing costs to customers.

For example, the Green bond issued by the Company in September 2019 was record-setting at the time of issuance for the Company and the entire utility sector for having the lowest interest rate on a 30-year bond in history. We note that it is difficult to determine whether this issuance was record-setting because of it being green or the favorable interest rate environment that currently exists. That said, the Company has noted a shift in capital markets as more and more investors are becoming “green-conscious.” As such, the Company believes that the “green” designation of the bond likely helped attract a more diverse base of investors and contributed to the success of accessing the markets at such a favorable rate.

- c. The obligations created by the “green” designation of the September 2019 bond issuance is the net proceeds (e.g., proceeds from the sale of the green first mortgage bonds, less the underwriting discount and other offering expenses payable by us) need to be used to finance and/or refinance, in whole or in part, existing and future Eligible Green Expenditures.

The Company must report that an amount equal to the net proceeds was used for Eligible Green Expenditures. The Company is required to obtain an attestation report from an independent accountant to certify that an amount equal to the net proceeds was used for Eligible Green Expenditures.

Due to the Company’s significant investment in wind and other renewables during the period from January 1, 2018 to June 1, 2020, the Company does not anticipate any significant risk associated with using the total net proceeds on such Eligible Green Expenditures. As such, the Company should not be subject to any penalties or risk associated with issuing the green first mortgage bond as compared to a standard first mortgage bond.

- d. The “Green” designation of the Company’s September 2019 bond issuance does not create any additional material costs associated with ongoing reporting requirements.

The only additional costs associated with the reporting requirements for a green bond as compared to a standard first mortgage bond relates to the fees associated with the attestation report from an independent accountant. The total fees associated with this report are approximately \$40,000 and will be included in the cost of long-term debt, but are not anticipated to impact the overall cost of debt due to its immateriality.

- e. Materials were not provided to potential investors prior to issuance for this Green bond issuance.

Preparer: Beth Osman
Title: Senior Forecast/Financial Analyst
Department: Treasury
Telephone: (612) 215-4641
Date: November 15, 2019

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Xcel Energy Information Request No. 5
Docket No.: E,G002/S-19-662
Response To: MN Department of Commerce
Requestor: Craig Addonizio
Date Received: November 5, 2019

Question:

Topic: Wind Investment Variances
Reference(s): Petition, Attachment N, page 3

Footnote (c) on Attachment N, page 3, states that approximately 95 percent of the approximately \$715 million increase in planned investments for 2020 between NSP's last capital structure Petition and this Petition (or approximately \$680 million) is related to the timing of wind payments.

- a. Please describe the reasons why the wind payments were delayed from 2019 to 2020.
- b. Attachment N, page 1, indicates that actual wind investments during 2019 were only \$546 million lower than planned. Please explain the \$134 million discrepancy between the amount of payments delayed from 2019 to 2020 and the reduction in 2019 investments (\$680 million versus \$546 million).

Response:

- a. Several wind project payments were delayed from 2019 into 2020 due to delays in the delivery of wind turbines and permitting.
 - b. The 2019 wind spend decrease of \$546 million and the 2020 wind spend increase of \$680 million is mainly due to the delayed payments for the wind projects as described above. The increase of \$134 million between the two years relates to incremental spend for the Jeffers Wind and Community Wind North Repowering Acquisition and the Mower Wind Facility (approximately \$300 million) offset by the reduction in size of the Crowned Ridge Wind project (approximately \$170 million) due to the results of transmission studies.
-

Preparer: Beth Osman
Title: Senior Forecast / Financial Analyst
Department: Treasury
Telephone: (612) 215-4641
Date: November 15, 2019

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E,G002/S-19-662

Dated this **10th** day of **February 2020**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_19-662_S-19-662
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James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-662_S-19-662
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_19-662_S-19-662
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-662_S-19-662
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-662_S-19-662
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