COMMERCE DEPARTMENT

March 2, 2020

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

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources Docket No. E002/AA-20-182

Dear Mr. Seuffert:

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

Filing by Northern States Power Company, doing business as Xcel Energy, Regarding the Fuel Clause Adjustment True-Up for November and December 2019.

The Department recommends **approval** and is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/SAMIR OUANES Public Utilities Rates Analyst

SO/ja Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/M-20-182

I. SUMMARY

On January 31, 2020, Northern States Power Company, doing business as Xcel Energy, (Xcel or the Company) filed a petition (Petition) requesting that the Minnesota Public Utilities Commission (Commission) approve Xcel's calculation of the Fuel Clause Adjustment (FCA) True-Up for November and December 2019. The Company proposes to implement the total true-up amount of -\$13,610,548 (a credit to ratepayers) in equal parts over the months of March and April 2020.

II. BACKGROUND INFORMATION

On March 1, 2019, the Electric Utilities (Minnesota Power, Otter Tail Power and Xcel) and Consumer Advocates (Minnesota Department of Commerce – Division of Energy Resources, Minnesota Office of Attorney General – Residential Utilities and Antitrust Division, Minnesota Chamber of Commerce, and Minnesota Large Industrial Group) filed joint comments, which included in part recommendations on Xcel's final 2019 FCA true-up:¹

> Under the current FCA process, Xcel Energy implements a forecasted rate each month, which also incorporates the true-up for the two months prior. When the FCA Reform process is implemented on January 1, 2020, the months of November and December 2019 will not have been trued up through the FCA mechanism. To address the true-ups for these months, the Company proposes to provide the supporting true-up calculations in a filing made by January 31, 2020, submitted in a new docket. The true-up amount would be implemented provisionally on March 1, 2020, subject to Commission review and approval. The true-up would be implemented in one or more months, depending on the size of the true-up. Customers would be notified of the true-up amount through a bill message. The Company's web page would also be updated to show a comparison table so that customers can see the forecasted rate approved by the Commission for that month, the true-up factor, and the total rate charged on the bill, all separately delineated.

¹ March 1, 2019 Joint Comments at 19-20 in Docket No. E999/CI-03-802.

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Month	Commission-	True-up	Total Rate
	Approved Rate	Factor	Charged
January			
February			
March			

The Company would use a similar table on the web site going forward since each year under the FCA Reform also would be subject to a true-up.

The Department reviewed Xcel's true-up proposal and considers it to be reasonable. Therefore, the Department recommends Xcel's true-up proposal be approved.

On June 12, 2019, the Commission issued its *Order Approving Additional Details of New Fuel Clause Adjustment Process* (2019 Order) in Docket No. E999/CI-03-802 (03-802).

The 2019 Order noted that:

When the new FCA process goes into effect on January 1, 2020, Xcel Energy will need to implement true ups for November and December 2019 from the existing FCA process. Xcel Energy proposed to submit its true-up filing for these two months by January 31, 2020, with the true up to be implemented provisionally on March 1, 2020, over one or more months. The Commission agrees with the Department that this transition plan is reasonable.

The 2019 Order allowed Xcel to implement its November and December 2019 true-up on March 1, 2020, subject to Commission review and approval.

III. DEPARTMENT ANALYSIS

The Company proposes to charge the following fuel cost charges in March and April 2020:²

² Petition at page 10 of 12 (Advanced Grid Infrastructure Rider).

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	1 1 2020	NA 1 2020	
Class	March 2020	March 2020	March 2020
	True-Up	Approved Fuel	Fuel Cost Charge
	Factor	Cost Charge	With True-Up
	(1)	(2)	(3) = (1) + (2)
Residential	-\$0.00293	\$0.02801	\$0.02508
C&I Non-Demand	-\$0.00297	\$0.02836	\$0.02539
C&I Demand	-\$0.00287	\$0.02748	\$0.02461
C&I Demand Time	-\$0.00360	\$0.03436	\$0.03076
Of Day On-Peak			
C&I Demand Time	-\$0.00235	\$0.02248	\$0.02013
of Day Off-Peak			
Outdoor Lighting	-\$0.00230	\$0.02196	\$0.01966

Class	April 2020	April 2020	April 2020
	True-Up	Approved Fuel	Fuel Cost Charge
	Factor	Cost Charge	With True-Up
	(1)	(2)	(3)= (1) + (2)
Residential	-\$0.00332	\$0.02919	\$0.02587
C&I Non-Demand	-\$0.00336	\$0.02956	\$0.02620
C&I Demand	-\$0.00326	\$0.02864	\$0.02538
C&I Demand Time	-\$0.00407	\$0.03579	\$0.03172
Of Day On-Peak			
C&I Demand Time	-\$0.00267	\$0.02344	\$0.02077
of Day Off-Peak			
Outdoor Lighting	-\$0.00260	\$0.02290	\$0.02030

In response to a phone request from the Department,³ Xcel provided the live spreadsheets supporting the Company's calculation of its proposed March and April 2020 true-up factors.

The live spreadsheets included:

- Xcel's calculation of the November 2019 FCA true-up, -\$6,413,756,⁴
- Xcel's calculation of the December 2019 FCA true-up, -\$7,196,792,⁵ and
- Xcel's calculation of the March and April 2020 true-up factors to return to its ratepayers the November and December 2019 over recovered FCA amounts of \$6,413,756 and \$7,196,792, respectively.⁶

³ Attachment 1 to these comments.

⁴ Attachment 2 to these comments.

⁵ Attachment 3 to these comments.

⁶ Attachment 4 to these comments.

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The Department reviewed Xcel's calculations and concludes that they are reasonable.

In addition, the Department verified that the March and April 2020 "Approved Fuel Cost Charge" are identical to Xcel's Commission-approved rates per the November 14, 2019 Order in Docket No. E002/AA-19-293.

As a result, the Department recommends approval of the proposed March and April 2020 fuel cost charges with true-up, subject to any input⁷ adjustment to Xcel's calculations following the Commission's Order in Xcel's upcoming AAA report for the July 2018-December 2019 period (Docket No. E999/AA-20-171).

IV. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

The Department recommends approval of the proposed March and April 2020 fuel cost charges with true-up, subject to any input adjustment to Xcel's calculations following the Commission's Order in Xcel's upcoming AAA report for the July 2018-December 2019 period (Docket No. E999/AA-20-171).

/ja

⁷ Such inputs include but are not limited to Xcel's monthly calculation of Asset Based Margin Sharing, MISO Day 2 Charges, MISO ASM Charges, Biomass PPA Termination Cost Recovery, Purchased Power from Solar Gardens Program, Wind Curtailment Payment, or Windsource Energy Costs.

From:Chow, JohnTo:Quanes, Samir (COMM)Subject:Xcel"s November & December 2019 FCA True-Up Computation, Attachment 1, Page 1 - 5Date:Thursday, February 06, 2020 10:51:30 AMAttachments:2020 02 MN COMPUTATION (TU DOC INFORMAL FEB 04).xlsx

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Hi Samir,

Per your phone request on February 4th, attached please find the live spreadsheets with formulas intact for our November and December 2019 FCA true-up calculation. The spreadsheets are the exact calculation as illustrated in Attachment 1, pages 1 through 5b of our January 31st true-up filing. Feel free to contact me if you have any questions.

Thanks, John

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Column B

Attachment 1 Page 2a

		Column A	Column B
		Projected *	Actual
		Nov-2019	Nov-2019
		* From 2 months ago	
A	System Fuel, Purchased Power Costs & MISO Recovery Authorized in Minnesota	Jurisdiction	
2	Account 151 - Fossil Fuel		\$30,777,503
2	Account 518 - Nuclear Fuel		\$10,395,029
3 4	Account 555 - Purchased Power (Include Windsource Wind Contracts, excludes wind cu	rtailment payments)	\$48,808,076
5	Account 555 - Wind Curtailment Payment (as reported in Wind Curtailment Report)	_	\$318,684
6	Account 555 - Subtotal [Line A3 + Line A4]	_	\$49,126,760
7	Account 555 - MISO Day 2 Charges - Total - Less Schedules 16 & 17		\$6,663,947
8	- Less Schedule 24		\$610,302 \$82,540
9	- Less Schedule 24 - Less RSG/RNU Allocation Adjustment		\$83,549 \$16,457
10	- Less Congestion and Loss Allocation Adjustment		\$16,457
11	Account 555 - MISO Day 2 Charges - Net [Line A6 - Line A7 - Line A8 - Line A9 - Line A10]	—	\$970,081 \$4,983,557
12	Account 555 - MISO ASM Charges	—	\$ 4 ,26 <i>3</i> ,337
13	- Excessive/Non-Excessive Charges		\$941,564
14	- Other Charges		\$20,814
15	- Less Congestion and Loss Allocation Adjustment		\$29,642
16	Account 555 - MISO ASM Charges - Net [Line A13 + Line A14 - Line A15]	_	\$932,736
17	Account 555 - Total MISO Charges [Line A11 + Line A16]		\$5,916,293
18	Total System Costs [Line A1 + Line A2 + Line A5 + Line A17]	—	\$96,215,585
19	Less Fuel Cost of Intersystem Sales (Included MISO Day 2 Charges)	—	(\$23,524,005)
20	Less Account 555 - Purchased Power For Windsource Program		(#20,021,000)
21	Windsource Energy Costs		(\$652,964)
22	Windsource REC-Related Fuel Costs		(. , , ,
23		_	(\$180,371)
	Subtotal [Line A21 + Line A22]		(\$833,335)
24	Less Account 555 - Purchased Power From Solar Gardens Program		
25	Direct Assigned Minnesota Cost Removed from System Cost [Attachment 3 Page 3 Line 14]*-1		(\$3,320,733)
26	Solar Gardens Developer Late Fees [Attachment 3 Page 3 Line 22]*-1		\$154,614
27	Less Account 555 - Renewable*Connect Program Energy Costs		(\$450,957)
28	Net System Costs (Excl Windsource & R*C PPA Costs) COL B [A1+A2+A5+A11+A16+A19+A21+A22+A25+A26+A27]	\$68,707,966	\$68,241,169
В	NSP System MWh Sales		
1	Total NSP System Retail		3,143,980
2	Firm Re-sale		-
3	Total NSP System		3,143,980
4	Windsource and Renewable*Connect MWh		41,826
5	Total NSP System Exclude Windsource [COL B Line B3 - Line B4]	3,051,091	3,102,154
С	NSP System Cost of Fuel, Purchased Power & MISO Recovery Per KWh		
1	System Energy Cost per kWh [COL B Line A28 / Line B5/ 10]	2.252¢	2.200¢

Column A

Attachment 1
Page 3a

Column B
Actual
Nov-2019

D	Minnesota Jurisdictional Calendar Month Retail MWh Sales Subject To FCA			
1	Total Minnesota Retail MWh		2,265,893	
2	Windsource MWh and Renewable*Connect MWh		41,826	
3	Total Minnesota Retail MWh Subject to FCA [COL B Line D1 - Line D2]	2,169,745	2,224,067	

E Minnesota Jurisdictional Energy Cost

¹ Net System Cost Applicable to Minnesota Jurisdiction [Line C1*Line D3]	\$48,862,657	\$48,929,474
2 System Cost per KWh [Line C1]	2.252¢	2.200¢
Biomass PPA Termination Cost Recovery		
³ Benson Amortization - FERC 557 (Regulatory Asset)	\$921,317	\$284,334
4 Benson Amortization - FERC 407 (Plant Impairment)	\$0	\$297,259
⁵ Benson ROE (Regulatory Asset) - FERC 182.2	\$0	\$172,807
6 Benson ROE (Plant Impairment) - FERC 182.3	\$0	\$166,751
7 Benson O&M Pass Through	\$0	\$ 0
8 Laurentian	\$0	\$0
9 Pine Bend	\$49,786	\$43,201
10 Total [Lines E3+E4+E5+E6+E7+E8+E9]	\$971,103	\$964,352
11 Cost per KWh [Line 10/line 3/10]	0.045¢	0.043¢
Solar Gardens Above Market Cost Allocated to MN Jurisdiction		
¹² Solar Gardens Above Market Bill Credit Amount	\$5,350,252	\$3,320,733
13 Less Solar Garden Developer Late Fees Credit	π • 3 0 • • • 3 • • • • • •	\$154,614
4 Solar Gardens Above Market Bill Credit Amount [COL B Line 12 - Line 13]	\$5,350,252	\$3,166,119
15 Cost per KWh [Line E14/Line D3/10]	0.247¢	0.142¢
6 Minnesota Jurisdiction Direct Cost [Line E10+Line E14]	\$6,321,355	\$4,130,471
17 Minnesota Direct Cost per KWh [Line E104/Line D80/10]	0.291¢	0.186¢
Total Minnesota Jurisdictional Energy Cost		
Total Minnesota Jurisdictional Energy Cost 8 Minnesota Total Energy Cost Per KWh [Line E2 + Line E17]	2.543¢	2.386¢

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Northern States Power Company Electric Operations - State of Minnesota Derivation of Adjustment for Fuel Clause Rider November 2019 Cost True Up Applicable to 2020 Fuel Cost Charges

		Column A	Column B
		Projected *	Actual
		Nov-2019	Nov-2019
		* From 2 months ago	
F	Adjusted Minnesota MWh Sales Subject To FCA		
1	(i) Residential		641,877
2	(ii) C & I Non-Demand		67,420
3	(iii) C & I Demand Non-TOD		712,932
4	(iv) C & I Demand TOD On-Peak		312,068
5	(v) C & I Demand TOD Off-Peak		477,814
6	(vi) Outdoor Lighting		11,956
7	Total [Line D3]	2,124,957	2,224,067
G	Class Ratio/TOD Ratio		
		<u>Sep-2019</u>	<u>Nov-2019</u>
1	(i) Residential	1.0177	1.0177
2	(ii) C & I Non-Demand	1.0305	1.0305
3	(iii) C & I Demand Non-TOD	0.9984	0.9984
4	(iv) C & I Demand TOD On-Peak	1.2486	1.2486
5	(v) C & I Demand TOD Off-Peak	0.8166	0.8166
6	(vi) Outdoor Lighting	0.7976	0.7976

H Proposed True Up Recovery in March 2020 and April 2020 Fuel Cost Charges

	ripused ride op recovery in match 2020 and right 2020 r der Gost Gharges			Total
1			L	Sep-2019
1	Prior Unrecovered Expenses (Sep-2019 Balance of Unrecovered Expenses)			(\$5,043,146)
		True-Up Factor	MWh	Total
		Sep-2019	Nov-2019	Nov-2019
	Prior (True-Up) Expenses Recovered in November 2019	(a)	(b)	(a)*(b)*10
2	(i) Residential	-0.236544¢	641,877	(\$1,518,322)
3	(ii) C & I Non-Demand	-0.239519¢	67,420	(\$161,484)
4	(iii) C & I Demand Non-TOD	-0.232058¢	712,932	(\$1,654,416)
5	(iv) C & I Demand TOD On-Peak	-0.290212¢	312,068	(\$905,659)
6	(v) C & I Demand TOD Off-Peak	-0.189802¢	477,814	(\$906,901)
7	(vi) Outdoor Lighting	-0.185386¢	11,956	(\$22,165)
8	Total	—	2,224,067	(\$5,168,947)
		Cost	MWh	Total
	Cost Recovered in November 2019 Based on Forecast	Forecast Cost 2 Months Ago		(a)*(b)*10
9	(i) Residential	2.587575¢	641,877	\$16,609,049
10	(ii) C & I Non-Demand	2.620821¢	67,420	\$1,766,958
11	(iii) C & I Demand Non-TOD	2.539219¢	712,932	\$18,102,905
12	(iv) C & I Demand TOD On-Peak	3.174942¢	312,068	\$9,907,978
13	(v) C & I Demand TOD Off-Peak	2.076126¢	477,814	\$9,920,021
14	(vi) Outdoor Lighting	2.028729¢	11,956	\$242,555
15	Total		2,224,067	\$56,549,466
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Attachment 1 Page 5a

I Nov-	19 True-Up	
1 Drior	Unrecovered Expenses (Sep-2019 Balance of Unrecovered Expenses) [COL C Line H1]	(\$5.042.14C)
	Prior (True-Up) Expenses Recovered in Nov-2019 [COL C Line H8]	(\$5,043,146) \$5,168,947
	ember 2019 Saver's Switch True-Up Adjustment	
4 Over	/Under Recovery in November-2019 to be Trued Up in March-2020 FCA [COL C - Line H15]	(\$56,549,466)
5 Actua	al Cost Should Have Been Recovered in November 2019 [COL B Line E19]	\$53,066,239
6 Balan	ce of Unrecovered Expenses [Sum of Line I1 to Line I5]	(\$3,357,426)
7 Asset	Based Margin Sharing [Attachment 3 Page 1 Remaining Balance]	(\$3,056,330)
8 Nove	ember 2019 True-Up [Line I6 + Line I7]	(\$6,413,756)

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Column B

Column C

		Column A	Column B	Column C
		Projected *	Actual	
		Dec-2019	Dec-2019	
		* From 2 months ago		
	n Fuel, Purchased Power Costs & MISO Recovery Authorized in Minnesota	Jurisdiction		
	nt 151 - Fossil Fuel		\$30,272,020	
	nt 518 - Nuclear Fuel		\$10,765,431	
	nt 555 - Purchased Power (Include Windsource Wind Contracts, excludes wind co	irtailment payments)	\$50,544,451	
	nt 555 - Wind Curtailment Payment (as reported in Wind Curtailment Report)		\$318,684	
necou	nt 555 - Subtotal (Line A3 + Line A4) nt 555 - MISO Day 2 Charges - Total		\$50,863,135	
	ess Schedules 16 & 17		\$6,379,070	
1.	ess Schedule 24		\$790,376 \$108,486	
1.4	ess RSG/RNU Allocation Adjustment		\$94,572	
	ess Congestion and Loss Allocation Adjustment		\$846,635	
	nt 555 - MISO Day 2 Charges - Net [Line A6 - Line A7 - Line A8 - Line A9 - Line A10]		\$4,539,001	
	nt 555 - MISO ASM Charges		¥ 1,0027,001	
	xcessive/Non-Excessive Charges		\$1,139,232	
	ther Charges		(\$21,090)	
15 - Le	ess Congestion and Loss Allocation Adjustment		\$3,273	
16 Accour	nt 555 - MISO ASM Charges - Net [Line A13 + Line A14 - Line A15]		\$1,114,868	
17 Accourt	nt 555 - Total MISO Charges [Line A11 +Line A16]		\$5,653,869	
18 Total S	System Costs [Line A1 + Line A2 + Line A5 + Line A17]		\$97,554,455	
19 Less Fu	uel Cost of Intersystem Sales (Included MISO Day 2 Charges)		(\$24,721,487)	
20 Less A	ccount 555 - Purchased Power For Windsource Program			
21 Wind	lsource Energy Costs		(\$577,490)	
22 Wind	dsource REC-Related Fuel Costs		(\$183,497)	
23 Subto	otal [Line A21 + Line A22]		(\$760,987)	
24 Less A	ccount 555 - Purchased Power From Solar Gardens Program		(#100,501)	
	ct Assigned Minnesota Cost Removed from System Cost [Attachment 3 Page 3 Line 14]*-1		(\$5,452,794)	
	Gardens Developer Late Fees [Attachment 3 Page 3 Line 22]*-1		\$427,800	
00111	count 555 - Renewable*Connect Program Energy Costs		(\$480,010)	
	vstem Costs (Excl Windsource & R*C PPA Costs)	\$76,120,641	\$66,566,977	
	A1+A2+A5+A11+A16+A19+A21+A22+A25+A26+A27]	+++++++++++++++++++++++++++++++++++++++	+ • • , • • , , • • , • • ,	
3 NSP S	wstem MWh Sales			
	VSP System Retail		3,395,867	
2 Firm R	·		-	
	NSP System		3,395,867	
	ource and Renewable*Connect MWh	—	46,962	
· winds(NSP System Exclude Windsource [COL B Line B3 -Line B4]	2 425 (20		
Jotai	NSP System Exclude Windsource [COL B Line B3 -Line B4]	3,437,639	3,348,905	
NSP S	system Cost of Fuel, Purchased Power & MISO Recovery Per KWh			
1 System	n Energy Cost per kWh [COL B Line A28 / Line B5/ 10]	2.214¢	1.988¢	

Column A

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Northern States Power Company Electric Operations - State of Minnesota Derivation of Adjustment for Fuel Clause Rider December 2019 Cost True Up Applicable to March 2020 Fuel Cost Charges Attachment 1 Page 3b

	Column A Projected * Dec-2019 * From 2 months ago	Column B Actual Dec-2019	Column C
Minnesota Jurisdictional Calendar Month Retail MWh Sales Subject To F	CA		
Total Minnesota Retail MWh		2,437,202	
Windsource MWh and Renewable*Connect MWh		46,962	
Total Minnesota Retail MWh Subject to FCA [COL B Line D1 - Line D2]	2,445,016	2,390,240	
Minnesota Jurisdictional Energy Cost			
Net System Cost Applicable to Minnesota Jurisdiction [Line C1*Line D3]	\$54,132,654	\$47,517,971	
System Cost per KWh [Line C1]	2.214¢	1.988¢	
Biomass PPA Termination Cost Recovery			
Benson Amortization - FERC 557 (Regulatory Asset)	\$918,288	\$284,173	
Benson Amortization - FERC 407 (Plant Impairment)	\$0	\$285,445	
Benson ROE (Regulatory Asset) - FERC 182.2	\$0	\$165,570	
Benson ROE (Plant Impairment) - FERC 182.3	\$0	\$166,740	
Benson O&M Pass Through	\$0	\$ 0	
Laurentian	\$0	\$ 0	
Pine Bend	\$42,979	\$46,613	
Total [Lines E3+E4+E5+E6+E7+E8+E9]	\$961,267	\$948,541	
Cost per KWh [Line 10/line 3/10]	0.039¢	0.040¢	
Solar Gardens Above Market Cost Allocated to MN Jurisdiction			
Solar Gardens Above Market Bill Credit Amount	\$4,493,158	\$5,452,794	
Less Solar Garden Developer Late Fees Credit		\$427,800	
Solar Gardens Above Market Bill Credit Amount [COL B Line 12 - Line 13]	\$4,493,158	\$5,024,994	
Cost per KWh [Line E14/Line D3/10]	0.184¢	0.210¢	
Minnesota Jurisdiction Direct Cost [Line E10+Line E14]	\$5,454,425	\$5,973,535	
⁷ Minnesota Direct Cost per KWh [Line E104/Line D80/10]	0.223¢	0.250¢	
Total Minnesota Jurisdictional Energy Cost			
³ Minnesota Total Energy Cost Per KWh [Line E2 + Line E17]	2.437¢	2.238¢	
Amount [Line E18 * Line D3 * 10]	\$59,587,069	\$53,493,571	

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		Column A	Column B	Column C
		Projected *	Actual	
		Dec-2019	Dec-2019	
		* From 2 months ago		
F	Adjusted Minnesota MWh Sales Subject To FCA			
1	(i) Residential		745,436	
2	(ii) C & I Non-Demand		74,052	
3	(iii) C & I Demand Non-TOD		734,640	
4	(iv) C & I Demand TOD On-Peak		307,876	
5	(v) C & I Demand TOD Off-Peak		513,771	
6	(vi) Outdoor Lighting		14,465	
7	Total [Line D3]	2,397,007	2,390,240	
G	Class Ratio/TOD Ratio			
G	Class Ratio/ TOD Ratio	0.0010	5 4444	
		<u>Oct-2019</u>	<u>Dec-2019</u>	
1	(i) Residential	1.0177	1.0177	
2	(ii) C & I Non-Demand	1.0305	1.0305	
3	(iii) C & I Demand Non-TOD	0.9984	0.9984	
4	(iv) C & I Demand TOD On-Peak	1.2486	1.2486	
5	(v) C & I Demand TOD Off-Peak	0.8166	0.8166	
6	(vi) Outdoor Lighting	0.7976	0.7976	

H True Up (Nov-19) and Other Recoveries

н	True Up (Nov-19) and Other Recoveries			
				Total
				Oct-2019
1	Prior Unrecovered Expenses (Oct-2019 Balance of Unrecovered Expenses)			(\$7,498,832)
	The Onecovered Expenses (Oct-2017 Duance of Onecovered Expenses)			(\$7,170,002)
		True-Up Factor	MWh	Total
		Oct-2019	Dec-2019	Dec-2019
	Prior (True-Up) Expenses Recovered in December 2019	(a)	(b)	(a)*(b)*10
2	(i) Residential	-0.312128¢	745,436	(\$2,326,714)
3	(ii) C & I Non-Demand	-0.316053¢	74,052	(\$234,044)
4	(iii) C & I Demand Non-TOD	-0.306208¢	734,640	(\$2,249,526)
5	(iv) C & I Demand TOD On-Peak	-0.382944¢	307,876	(\$1,178,993)
6	(v) C & I Demand TOD Off-Peak	-0.250450¢	513,771	(\$1,286,739)
7	(vi) Outdoor Lighting	-0.244623¢	14,465	(\$35,385)
8	Total	_	2,390,240	(\$7,311,401)
		Cost	MWh	Total
	Cost Recovered in November 2019 Based on Forecast	Forecast Cost 2 Months Ago		(a)*(b)*10
9	(i) Residential	2.479699¢	745,436	\$18,484,569
10	(ii) C & I Non-Demand	2.511588¢	74,052	\$1,859,881
11	(iii) C & I Demand Non-TOD	2.433389¢	734,640	\$17,876,649
12	(iv) C & I Demand TOD On-Peak	3.042590¢	307,876	\$9,367,404
13	(v) C & I Demand TOD Off-Peak	1.989566¢	513,771	\$10,221,813
14	(vi) Outdoor Lighting	1.944183¢	14,465	\$281,226
15	Total		2,390,240	\$58,091,542

Attachment 1 Page 5b

Ι	Dec-19 True-Up	
	Prior Unrecovered Expenses (Oct-2019 Balance of Unrecovered Expenses) [COL C Line H1]	(\$7,498,832)
2	Less Prior (True-Up) Expenses Recovered in Dec-2019 [COL C Line H8]	\$7,311,401
3	December 2019 Saver's Switch True-Up Adjustment	
4	Over/Under Recovery in December-2019 to be Trued Up in March-2020 FCA [COL C - Line H15]	(\$58,091,542)
5	Actual Cost Should Have Been Recovered in December 2019 [COL B Line E19]	\$53,493,571
6	Balance of Unrecovered Expenses [Sum of Line I1 to Line I5]	(\$4,785,402)
7	Asset Based Margin Sharing [Attachment 3 Page 1 Remaining Balance]	(\$2,411,390)
8	December 2019 True-Up [Line I6 + Line I7]	(\$7,196,792)

Attachment 1

Page 1

S December 2019 and November 2019 Cost True Up

	Dec-19 True-Up	
1	Balance of Unrecovered Expenses [Page 5b Line I6]	(\$4,785,402)
2	Asset Based Margin Sharing [Page 5b Line 17]	(\$2,411,390)
3	Total Amount [Page 5b Line I8]	(\$7,196,792)
	Nov-19 True-Up	
4	Balance of Unrecovered Expenses [Page 5a Line 16]	(\$3,357,426)
5	Asset Based Margin Sharing [Page 5a Line I7]	(\$3,056,330)
6	Total Amount [Page 5a Line 18]	(\$6,413,756)
7	December 2019 and November 2019 True Up Amount [Line S3 + Line S6]	(\$13,610,548)

Proposed Free Op (Recovery in Wirter 2020 and April 2020 Free Cost Charges March 2020 April 2020 1 The Up Amount [Line 57/2] (\$6,005,274) 2 March 2020 and April 2020 Forecasted Sales (MWh) 2,363,565 2,0085,793 3 The Up Factor per KWh [Line 11/Line 12/1000] (\$0,00285) (\$0,00226) 4 (0) Residential 1,0177 1,0177 4 (0) Residential 1,0177 1,0177 6) C.K. I.Demand Non-TOD 0,9984 0,9984 9) C. & I.Demand TOD On-Peak 0,21964 1,2486 9) O. Outdoor Lighting 0,7976 0,7776 Class The Up Factors (\$0,00237) (\$0,00329) 10) O. C. & I.Demand Non-TOD (\$0,00237) (\$0,00320) 11 (b) C. & I.Demand Non-TOD (\$0,00237) (\$0,00330) 12 (in C. & I.Demand Non-TOD (\$0,00237) (\$0,00330) 12 (in C. & I.Demand Non-TOD (\$0,00237) (\$0,00330) 13 (i) C. & I.Demand Non-TOD (\$0,00237) (\$0,00320) 14 (i) C. & I.Demand Non-TOD		Description of Trans II - Description in March 2020 and Arril 2020 Fuel Cast Charges		
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March 2020 and April 2020 Forecasted Fuel Cost Charges * \$0.02801 \$0.02919 (i) Residential \$0.02836 \$0.02956 (ii) C & I Demand Non-TOD \$0.02748 \$0.02846 (iv) C & I Demand TOD On-Peak \$0.02248 \$0.02346 (v) O & I Demand TOD Off-Peak \$0.02248 \$0.02344 (v) O utdoor Lighting \$0.02196 \$0.02290 Proposed March 2020 and April 2020 Forecasted Fuel Cost Charges with True Up \$0.02508 \$0.02587 (ii) C & I Demand Non-TOD \$0.02539 \$0.02539 (iii) C & I Demand TOD On-Peak \$0.02539 \$0.02620 (iii) C & I Demand TOD On-Peak \$0.02539 \$0.02538 (iii) C & I Demand TOD On-Peak \$0.02539 \$0.02538 (iii) C & I Demand Non-TOD \$0.02539 \$0.02538 (iii) C & I Demand Non-TOD \$0.02539 \$0.02538 (iv) C & I Demand TOD On-Peak \$0.02539 \$0.02538 (v) C & I Demand TOD On-Peak \$0.02539 \$0.02538 (v) C & I Demand TOD On-Peak \$0.03076 \$0.03172 (v) C & I Demand TOD On-Peak \$0.02013 \$0.02077	14	(v) C & I Demand TOD Off-Peak	(\$0.00235)	(\$0.00267)
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16 (i) Residential \$0.02801 \$0.02919 17 (ii) C & I Non-Demand \$0.02836 \$0.02956 18 (iii) C & I Demand Non-TOD \$0.02748 \$0.02864 19 (iv) C & I Demand TOD On-Peak \$0.03436 \$0.03579 20 (v) C & I Demand TOD Off-Peak \$0.02248 \$0.02344 21 (vi) Outdoor Lighting \$0.02196 \$0.02290 Proposed March 2020 and April 2020 Forecasted Fuel Cost Charges with True Up (i) Residential \$0.02508 \$0.02587 3 (ii) C & I Non-Demand \$0.02508 \$0.02620 24 (iii) C & I Demand Non-TOD \$0.02539 \$0.02620 24 (iii) C & I Demand Non-TOD \$0.02539 \$0.02538 25 (iv) C & I Demand TOD On-Peak \$0.03076 \$0.03172 26 (v) C & I Demand TOD On-Feak \$0.02013 \$0.02077				
17 (ii) C & I Non-Demand \$0.02836 \$0.02956 18 (iii) C & I Demand Non-TOD \$0.02748 \$0.02864 19 (iv) C & I Demand TOD On-Peak \$0.03436 \$0.03579 20 (v) C & I Demand TOD Off-Peak \$0.02248 \$0.02344 21 (vi) Outdoor Lighting \$0.02196 \$0.02290 Proposed March 2020 and April 2020 Forecasted Fuel Cost Charges with True Up (i) Residential \$0.02508 \$0.02587 26 (ii) C & I Non-Demand \$0.02539 \$0.02620 27 (ii) C & I Non-Demand \$0.02539 \$0.02620 28 (ii) C & I Demand Non-TOD \$0.0261 \$0.02538 29 (ii) C & I Demand TOD On-Peak \$0.03076 \$0.03172 20 (v) C & I Demand TOD On-Peak \$0.02013 \$0.02077		March 2020 and April 2020 Forecasted Fuel Cost Charges *		
(a) C & I Demand Non-TOD \$0.02748 \$0.02748 (ii) C & I Demand TOD On-Peak \$0.02748 \$0.02864 (v) C & I Demand TOD Off-Peak \$0.03436 \$0.03579 (v) C & I Demand TOD Off-Peak \$0.02248 \$0.02344 (vi) Outdoor Lighting \$0.02196 \$0.02290 Proposed March 2020 and April 2020 Forecasted Fuel Cost Charges with True Up (i) C & I Non-Demand \$0.02508 \$0.02587 (ii) C & I Non-Demand \$0.02539 \$0.02620 (ii) C & I Demand Non-TOD \$0.02538 \$0.02538 (ii) C & I Demand TOD On-Peak \$0.02539 \$0.02538 (ii) C & I Demand TOD On-Peak \$0.02538 \$0.02538 (v) C & I Demand TOD On-Peak \$0.03076 \$0.03172 (v) C & I Demand TOD Off-Peak \$0.02013 \$0.02077	16	(i) Residential	\$0.02801	\$0.02919
10 (iii) C & I Demand TOD (iv) C & I Demand TOD On-Peak \$0.02140 \$0.03436 \$0.03579 20 (v) C & I Demand TOD Off-Peak \$0.02248 \$0.02344 21 (vi) Outdoor Lighting \$0.02196 \$0.02290 Proposed March 2020 and April 2020 Forecasted Fuel Cost Charges with True Up 22 (i) Residential \$0.02508 \$0.02587 3 (ii) C & I Non-Demand \$0.02539 \$0.02620 24 (iii) C & I Demand Non-TOD \$0.02461 \$0.02538 25 (iv) C & I Demand TOD On-Peak \$0.03076 \$0.03172 26 (v) C & I Demand TOD Off-Peak \$0.02013 \$0.02077	17	(ii) C & I Non-Demand	\$0.02836	\$0.02956
20(v) C & I Demand TOD Off-Peak\$0.02248\$0.0234421(v) Outdoor Lighting\$0.02196\$0.02290Proposed March 2020 and April 2020 Forecasted Fuel Cost Charges with True Up22(i) Residential\$0.02508\$0.025873(ii) C & I Non-Demand\$0.02539\$0.026204(iii) C & I Demand Non-TOD\$0.02461\$0.025385(iv) C & I Demand TOD On-Peak\$0.03076\$0.031726(v) C & I Demand TOD Off-Peak\$0.02013\$0.02077	18	(iii) C & I Demand Non-TOD	\$0.02748	\$0.02864
21(vi) Outdoor Lighting\$0.02196\$0.02290Proposed March 2020 and April 2020 Forecasted Fuel Cost Charges with True Up22(i) Residential\$0.02508\$0.025873(ii) C & I Non-Demand\$0.02539\$0.026204(iii) C & I Demand Non-TOD\$0.02461\$0.025385(iv) C & I Demand TOD On-Peak\$0.03076\$0.030766(v) C & I Demand TOD Off-Peak\$0.02013\$0.02017	19	(iv) C & I Demand TOD On-Peak	\$0.03436	\$0.03579
Proposed March 2020 and April 2020 Forecasted Fuel Cost Charges with True Up \$0.02508 \$0.02587 22 (i) Residential \$0.02508 \$0.02587 23 (ii) C & I Non-Demand \$0.02539 \$0.02620 24 (iii) C & I Demand Non-TOD \$0.02461 \$0.02538 25 (iv) C & I Demand TOD On-Peak \$0.03076 \$0.03172 26 (v) C & I Demand TOD Off-Peak \$0.02013 \$0.02077	20	(v) C & I Demand TOD Off-Peak	\$0.02248	\$0.02344
22 (i) Residential \$0.02508 \$0.02587 23 (ii) C & I Non-Demand \$0.02539 \$0.02620 24 (iii) C & I Demand Non-TOD \$0.02461 \$0.02538 25 (iv) C & I Demand TOD On-Peak \$0.03076 \$0.03172 26 (v) C & I Demand TOD Off-Peak \$0.02013 \$0.02077	21	(vi) Outdoor Lighting	\$0.02196	\$0.02290
22 (i) Residential \$0.02508 \$0.02587 23 (ii) C & I Non-Demand \$0.02539 \$0.02620 24 (iii) C & I Demand Non-TOD \$0.02461 \$0.02538 25 (iv) C & I Demand TOD On-Peak \$0.03076 \$0.03172 26 (v) C & I Demand TOD Off-Peak \$0.02013 \$0.02077				
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25 (iv) C & I Demand TOD On-Peak \$0.03076 \$0.03172 26 (v) C & I Demand TOD Off-Peak \$0.02013 \$0.02077			\$0.02539	\$0.02620
26 (v) C & I Demand TOD Off-Peak \$0.02013 \$0.02077				\$0.02538
			\$0.03076	\$0.03172
27 (vi) Outdoor Lighting \$0.01966 \$0.02030				
	27	(vi) Outdoor Lighting	\$0.01966	\$0.02030

* Commission approved 2020 fuel cost charges under Docket No. E002/AA-19-293 dated November 14, 2019