COMMERCE DEPARTMENT

August 30, 2021 **PUBLIC DOCUMENT**

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

RE: **PUBLIC Response Comments of the Minnesota Department of Commerce, Division of Energy Resources to Xcel Energy's Reply Comments**
Docket No. E002/AA-21-295

Dear Mr. Seuffert:

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

> Northern States Power Company d/b/a/ Xcel Energy, Incorporated's (Xcel) Petition for Approval of its 2022 Annual Fuel Forecast and Monthly Fuel Cost Charges.

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve Xcel's 2022 fuel forecast with the modifications discussed herein.** The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ MARK JOHNSON
Analyst Coordinator

MJ/ja
Attachment

COMMERCE DEPARTMENT

Before the Minnesota Public Utilities Commission

PUBLIC Response Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E002/AA-21-295

I. INTRODUCTION

On June 30, 2021, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed comments (Comments) in the matter of Northern States Power Company d/b/a/ Xcel Energy, Incorporated's (Xcel or the Company) April 30, 2021 petition for approval of proposed 2022 forecasted fuel rates for its Fuel Clause Adjustment Rider (FCA).

On July 30, 2021, Xcel filed reply comments (Reply Comments) addressing the Department's Comments. In addition, Xcel updated several inputs (including its sales forecast) to its proposed 2022 forecasted fuel costs and rates. According to Xcel, the updates to model inputs increase Xcel's proposed 2022 FCA rates by $43.8 million, resulting in an average rate of $31.47 per MWh compared to Xcel's initial request of $30.25 per MWh for the Minnesota jurisdiction.

The Department addresses Xcel's Reply Comments below.

II. DEPARTMENT'S ANALYSIS

A. XCEL'S SALES FORECAST FOR 2022

i. Department's June 30, 2021 Comments

The Department provided the table below in its July 1, 2020 Comments summarizing Xcel's net system sales and production levels for its 2022 sales forecast, 2021 sales forecast, 2018-2020 actuals, and 2018-2020 average:

Department Table 1: Xcel's 2022 and 2021 Forecasted Sales and Production Levels Compared to 2018-2020 Actual Sales and Production Levels (MWh's)[1]

	2022 Forecast	2021 Forecast	2020 Actuals	2019 Actuals	2018 Actuals	2018-2020 Average
Total Net System Sales of Electricity for FCA	**[TRADE SECRET DATA HAS BEEN EXCISED]**		38,456,375[2]	39,826,993[3]	41,588,127[4]	39,957,165[5]
Total Net System Production Level			40,109,000[6]	40,909,000[7]	44,647,000[8]	41,888,000[9]

The Department concluded in our initial comments that Xcel's 2022 sales forecast appeared reasonable and recommended that the Commission accept Xcel's 2022 forecasted sales in this proceeding to set initial rates for 2022, subject to true-up.

ii. Xcel's July 30, 2021 Reply Comments

Xcel stated on page 6 of its Reply Comments that it updated the 2022 load forecast in PLEXOS to reflect the most current customer sales forecast, which increased total native system load by approximately **[TRADE SECRET DATA HAS BEEN EXCISED]**. Xcel's updated 2022 sales forecast is provided in Attachment G of its Reply Comments.

The Department provides a summary of Xcel's initial and updated 2022 sales forecast in Table 2 below.

[1] Excludes Windsource and Renewable*Connect.
[2] Per Xcel's Response to Department Information Request No. 1, Part a.
[3] Per Xcel's Response to Department Information Request No. 1, Part a.
[4] *Id.*
[5] Calculated by Department; sum for 2018-2020/3.
[6] Per Xcel's Response to Department Information Request No. 1, Part b.
[7] Per Xcel's Response to Department Information Request No. 1, Part b.
[8] *Id.*
[9] Calculated by Department; sum for 2018-2020/3.

Department Table 2: Xcel's Initial and Updated 2022 Forecasted Sales (MWh's)

	2022 Updated Forecast	2022 Initial Forecast	Difference	Percent Difference
Total Net System Sales of Electricity for FCA	**[TRADE SECRET DATA HAS BEEN EXCISED]**			

The Department reviewed Xcel's updated sales forecast for 2022 and concludes that it appears reasonable given the increased sales. The Department recommends that the Commission accept Xcel's updated 2022 forecasted sales in this proceeding to set initial FCA rates for 2022, noting that Xcel's FCA revenues and costs are subject to true-up pursuant to the 2023 True-up Report. The Department notes that our recommendations in this docket should not be used in Xcel's future rate cases or other rate proceedings, where a more thorough review of the sales forecast will occur.

B. ASSET-BASED MARGINS

i. Department's June 30, 2021 Comments

As explained on page 20 of the Department's Comments, Xcel's forecasted 2022 asset-based margins of **[TRADE SECRET DATA HAS BEEN EXCISED]** were **[TRADE SECRET DATA HAS BEEN EXCISED]** than the 2018-2020 average of $45.9 million and **[TRADE SECRET DATA HAS BEEN EXCISED]** than Xcel's actual 2020 asset-based margins of **[TRADE SECRET DATA HAS BEEN EXCISED].** As a result, the Department recommended that Xcel fully explain in reply comments why its forecasted 2022 asset-based margins were **[TRADE SECRET DATA HAS BEEN EXCISED]** than Xcel's actual 2020 asset-based margins.

ii. Xcel's July 30, 2021 Reply Comments

Beginning on page 2 of its Reply Comments, Xcel stated:

> The margin forecast for 2022 is lower due to higher forecast load and natural gas price for 2022. As shown in Department Table 1, net system load at the production level is forecast to be 2.3 percent higher than actual load in 2020, which was reduced as a result of the pandemic. Higher load results in less surplus generation available for asset-based sales, and correspondingly less in margins. In addition, the natural gas price forecast for 2022 is 45 percent higher than average actual gas prices for 2020. Higher gas prices in the forecast for 2022 means that the underlying cost of gas-fired generation used to make asset-based sales is higher, and

> therefore resulting margins from those units will be lower than observed in 2020.

The following table compares Xcel's initial margin forecast for 2022 from its petition and its updated forecast from its Reply Comments. According to Xcel, the change in the margin forecast is driven by the modeling inputs that have changed as part of the forecast update discussed more fully in section D of Xcel's Reply Comments.

Department Table 3: Xcel's Initial and Updated Forecasted 2022 Asset-Based Margins (MWh's)

	2022 Updated Forecast	2022 Initial Forecast	Difference
Asset-Based Margins (millions)	**[TRADE SECRET DATA HAS BEEN EXCISED]**		

The Department notes that Xcel's updated forecasted 2022 asset-based margins of **[TRADE SECRET DATA HAS BEEN EXCISED]** to Xcel's actual 2020 asset-based margins of **[TRADE SECRET DATA HAS BEEN EXCISED]** than its initial forecast, as well as its actual average asset-based margins of $45.9 million for 2018-2020.[10]

Based on the above information, the Department concludes that Xcel reasonably explained the changes in its forecasted 2022 asset-based margins compared to 2020 actuals. As a result, the Department recommends that the Commission accept Xcel's updated forecasted 2022 asset-based margins in this proceeding to set FCA rates for 2022, subject to true-up pursuant to the 2023 True-up Report.

[10] Department's June 30, 2021 Comments, page 20.

C. OUTAGE COSTS

i. Department's June 30, 2021 Comments

The Department provided the table below in its June 30, 2021 Comments summarizing Xcel's outage costs:

Department Table 4 (formerly Department Table 6): Forecasted, Actual, and Average Outage MWh and Costs

	Year	Planned Outage MWh (a)	Planned Outage Costs (b)	Unplanned Outage MWh (c)	Unplanned Outage Costs (d)	Total Outage MWh (e)	Total Outage Costs (f)
1	2022 Forecast[11]	**[TRADE SECRET DATA HAS BEEN EXCISED]**					
2	2021 Forecast[12]						
3	2020 Actuals[13]	1,367,612	$571,240	1,212,160	$25,527,416	2,579,772	$26,098,656
4	2019 Actuals[14]	2,444,517	$17,753,190	1,063,497	$4,936,021	3,508,014	$22,689,211
5	2018 Actuals[15]	2,862,286	$15,964,482	1,547,119	$8,160,970	4,409,405	$24,125,452

The Department noted that Xcel's forecasted total 2022 outage costs (Line 1, column (f)) are **[TRADE SECRET DATA HAS BEEN EXCISED]** than in any prior year, even though its estimated 2022 total outage MWh's (Line 1, column (e)) are **[TRADE SECRET DATA HAS BEEN EXCISED]** than any prior year. As a result, the Department requested that Xcel explain the reason for this divergence in reply comments.

ii. Xcel's July 31, 2020 Reply Comments

Xcel stated the following beginning on page 2 of its Reply Comments:

> The Department's Table 6 lists the 2022 forecast values (Line 1, Columns (b), (d), and (f)) and 2020 actual values (Line 3, Columns (d) and (f)) incorrectly. Once the corrected, comparable values are populated in the table, it shows that the forecasted 2022 outage costs are in-line with the forecasted outage MWhs and that the 2022 outage forecast is significantly less than the 2021 outage

[11] Petition, Part B, Attachment 7.
[12] Updated 2021 forecast information per Xcel's July 31, 2020 Reply Comments in Docket No. E002/AA-20-417, Attachment B.
[13] Per Xcel's Response to Department Information Request No. 7, Attachment A.
[14] *Id.*
[15] *Id*.

forecast. We have provided a corrected Department Table 6 below. Updated values are shown in red.

We have added line 1a to the table to show the outage forecast as updated in this Reply. The updated 2022 outage forecast remains significantly less than the 2021 outage forecast and in line with recent historical outage costs. The updated 2022 forecast shows greater outage costs than in our initial forecast because replacement power costs went up due to the increase in the locational marginal pricing (LMP) forecast, described below. Additional details of the updated outage forecast are provided in Attachment H.

Corrected Department Table 6:
Forecasted Actual, and Average Outage MWh and Costs

	Year	Planned Outage MWh (a)	Planned Outage Costs (b)	Unplanned Outage MWh (c)	Unplanned Outage Costs (d)	Total Outage MWh (e)	Total Outage Costs (f)
		[PROTECTED DATA BEGINS					
1	2022 Initial Forecast						
1a	2022 Reply Forecast						
2	2021 Forecast						
					PROTECTED DATA ENDS]		
3	2020 Actuals	1,367,612	$571,240	1,212,160	$11,348,069	2,579,772	$11,919,308
4	2019 Actuals	2,444,517	$17,753,190	1,063,497	$4,936,021	3,508,014	$22,689,211
5	2018 Actuals	2,862,286	$15,964,482	1,547,119	$8,160,870	4,409,405	$24,125,452

Columns (b) and (d) in Department Table 6 are labeled "Energy Costs due to Outages" in Part B, Attachment 7 of our initial Petition and in Attachment A to Department Information Request No. 7. These columns subtract the unit cost from the replacement power cost to get the delta between normal operational cost of the unit and additional costs due to outages. The Department included values from the "Replacement Cost" columns for Columns (b), (d), and (f).

We hope this correction alleviates the Department's concerns regarding our 2022 outage forecast.

The Department agrees that it used incorrect figures in Table 6 of its June 30, 2021 Comments and appreciates Xcel's corrections. Upon further review, the Department agrees with Xcel that its initially forecasted 2022 outage costs are in-line with the forecasted outage MWhs and that the 2022 outage forecast is significantly less than the 2021 outage forecast.

The Department also reviewed Xcel's updated 2022 outage costs. The Department agrees with Xcel that its updated 2022 outage forecast remains significantly less than its 2021 outage forecast and is in line with recent historical outage costs. In addition, the Department concludes that Xcel has reasonably explained the increase in updated 2022 outage costs compared to its initial forecast (due to higher LMP prices).

Based on the above, the Department recommends that the Commission accept Xcel's updated forecast of 2022 outage costs for purposes of establishing FCA rates in this proceeding, subject to refund via the 2023 true-up.

D. WIND CURTAILMENT COSTS

i. Department's June 30, 2021 Comments

The Department recommended that Xcel explain in reply comments its significant **[TRADE SECRET DATA HAS BEEN EXCISED]** in forecasted 2022 wind curtailment costs relative to forecasted 2021 wind curtailment costs.

ii. Xcel's July 30, 2021 Reply Comments

Beginning on page 3 of its Reply Comments, Xcel acknowledged that its forecasted 2022 wind curtailment costs were significantly higher than their forecasted 2021 wind curtailment costs. However, Xcel stated that its forecasted 2022 wind curtailment costs are lower than the actual wind curtailment costs that the Company expects will occur in 2021 because of higher-than-expected regional congestions costs and the resulting negative LMPs in the MISO energy market during 2021. Xcel stated that they updated their wind curtailment forecast methodology in their 2021 forecast in order to capture the impacts of a significant amount of new generation going into service prior to completion of all required transmission upgrades along with planned transmission outages. In addition, Xcel stated that at the time the 2021 forecast was completed the impact of the new generation on congestion was not clear, and the scope of the transmission outages occurring in 2021 was not known.

Xcel stated that they used a similar methodology for the 2022 forecast as they expect higher curtailment to continue for the foreseeable future, although likely lower than the curtailment that occurred in 2020 and 2021. Xcel also stated that it believes the curtailment in 2022 will be related more to congestion caused by the significant amount of new generation that has gone into service as opposed to transmission outages.

In addition, Xcel stated the following beginning on page 4 of its Reply Comments:

> We calculated the 2022 wind curtailment costs by first identifying years where a significant amount of new generation went into service prior to completion of all transmission upgrades. We

excluded the highest curtailment cost year as an outlier and then averaged the curtailment percentage for the remaining highest years of curtailment costs where curtailment was greater than 3 percent. Table 2 below shows the calculation for the 2022 forecast. To estimate the curtailment costs for 2022, the 5.91 percent average was applied to the costs of the wind projects we expect to be impacted by curtailment in 2022. This resulted in a 2022 curtailment forecast of **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]**. These wind projects are shown in Part G, Workpaper 9 of our May 1 initial filing.

Table 2:
Historical Wind Curtailment Costs

Year	% Curtailment
2003	4.24%
2005	5.31%
2007	6.44%
2013	6.30%
2014	5.74%
2015	3.81%
2020	9.52%
Average	**5.91%**

The Company provided a detailed discussion of wind curtailment in the Wind Portfolio Acquisition proceeding, Docket No. E002/M-16-777. At that time, the Company discussed that we expect wind curtailment to be higher when the new projects first go into service, and then decline as new transmission and other changes on the MISO system occur to better accommodate increased wind penetration. While we continue to believe that this will be the case, there is no certainty as to when, and if, the numerous wind generation projects currently in the development queue will actually come to fruition. (footnotes omitted).

Based on the above, the Department concludes that Xcel reasonably explained the changes in forecasted 2022 wind curtailment costs. As a result, the Department recommends that the Commission accept Xcel's forecasted 2022 wind curtailment costs in this proceeding to set FCA rates for 2022, noting that Xcel's FCA revenues and costs are subject to true-up via the 2023 True-up Report. The Department notes that our recommendations in this docket should not be used in Xcel's future rate cases or other rate proceedings, where a more thorough review of wind curtailment costs may occur.

E. XCEL'S UPDATED 2022 FORECASTED FCA COST SUMMARY

As explained on pages 5-6 of its Reply Comments, Xcel updated several of the cost inputs to its proposed 2022 FCA costs. The updated costs are summarized in Attachments A, B, and C of Xcel's Reply Comments. The Department provides a summary of Xcel's initial and updated 2022 FCA costs in Table 5 below.

Department Table 5: Xcel's Initial and Updated Forecasted 2022 FCA Costs (in 1000's)[16]

		Updated 2022 Forecast[17]	Initial 2022 Forecast[18]	Difference
1	Xcel's Generating Stations	**[TRADE SECRET DATA HAS BEEN EXCISED]**		
2	Plus: LT Purchased Energy			
3	Plus: LT CSG[19]			
4	Plus: ST Market Purch			
5	Total System Costs			
6	Less: Sales Revenues[20]			
7	Less: CSG-AMC[21]			
8	Less: Windsource			
9	Less: Renewable* Connect Pilot			
10	Less: Renewable* Connect MTM			
11	Less: Renewable* Connect LT			
12	Net System FCA Costs			
13	Total System Sales MWh			
14	Less: Windsource MWh's			
15	Less: Renewable* Connect Pilot			
16	Less: Renewable* Connect MTM			
17	Less: Renewable* Connect LT			
18	Net System Sales MWh			

[16] Continued next page.
[17] Per Xcel's July 30, 2021 Reply Comments, Attachment A.
[18] Per Department's June 30, 2021 Comments, page 9, Table 2; Per Xcel's Response to Department Information Request No. 2, Attachment A.
[19] Long-term purchased energy from CSGs.
[20] Revenues received from MISO attributable to the Company's asset-based sales.
[21] Community Solar Gardens – Above Market Costs.

19	Net System FCA Costs $/MWh	**[TRADE SECRET DATA HAS BEEN EXCISED]**
20	MN Juris. Sales MWh's	
21	Less: Windsource MWh's	
22	Less: Renewable* Connect Pilot	
23	Less: Renewable* Connect MTM	
24	Less: Renewable* Connect LT	
25	Net MN Sales MWh's	
26	MN FCA Costs	
27	Add: CSG-AMC[22]	
28	Add: Laurentian Buyout	
29	Add: Pine Bend Buyout	
30	Add: Benson Buyout	
31	Net MN FCA Costs	
32	Net MN FCA Costs $/MWh	
33	MN FCA Premium Costs $/MWh	

The Department reviewed Xcel's proposed updates to its forecasted 2022 FCA costs and resulting monthly FCA rates shown on page 7 of Xcel's Reply Comments. The Department notes that Xcel's proposed cost updates result in a $43.8 million increase to the dollar amount of forecasted 2022 FCA costs that are assigned to the Minnesota jurisdiction (line 31). After accounting for the change in forecasted sales, the Department notes that Xcel's proposed FCA update results in a **[TRADE SECRET DATA HAS BEEN EXCISED]**.

Based on the discussion above, the Department concludes that Xcel's proposed updates to its forecasted 2022 FCA costs appear reasonable and recommends that the Commission approve them for purposes of setting initial monthly FCA rates shown in Attachment A, Page 2 of 3 of Xcel's Reply Comments, subject to true-up via the 2023 True-up Report.

III. SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS

The Department recommends that the Commission accept Xcel's updated 2022 forecasted sales in this proceeding to set FCA rates for 2022, subject to true-up via the 2023 True-up Report. As noted above, this recommendation should not be used in Xcel's future rate cases or other rate proceedings, where a more thorough review of the sales forecast will occur.

[22] *Id*.

The Department concludes that Xcel has reasonably explained the changes in its forecasted 2022 asset-based margins and recommends that the Commission accept Xcel's updated 2022 forecasted asset-based margins in this proceeding, subject to true-up via the 2023 True-up Report.

The Department agrees with Xcel that its initially forecasted 2022 outage costs are in-line with the forecasted outage MWhs and that the 2022 outage forecast is significantly less than the 2021 outage forecast. In addition, the Department concludes that Xcel has reasonably explained the increase in updated 2022 outage costs compared to its initial forecast. As a result, the Department recommends that the Commission accept Xcel's updated forecast of 2022 outage costs for purposes of establishing FCA rates in this proceeding, subject to refund via the 2023 true-up.

The Department concludes that Xcel reasonably explained the changes in forecasted 2022 wind curtailment costs. As a result, the Department recommends that the Commission accept Xcel's forecasted 2022 wind curtailment costs in this proceeding to set FCA rates for 2022, noting that Xcel's FCA revenues and costs are subject to true-up via the 2023 True-up Report.

The Department concludes that Xcel's proposed updates to its forecasted 2022 FCA costs appear reasonable and recommends that the Commission approve them for purposes of setting initial monthly FCA rates shown in Attachment A, Page 2 of 3 of Xcel's Reply Comments, subject to true-up via the 2023 True-up Report.

/ja

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
Public Response Comments

Docket No. E002/AA-21-295

Dated this 30th day of August 2021

/s/Sharon Ferguson

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