



2012 Renewable Energy Standard Compliance Report

Public Service Company of Colorado | July 2013 Docket No. 11A-418E

2012 RENEWABLE ENERGY STANDARD

COMPLIANCE REPORT

I. Introduction

Pursuant to Colorado Public Utilities Commission (the "Commission") Rule 3662, investor-owned Qualifying Retail Utilities ("QRUs") like Public Service Company of Colorado ("Public Service" or the "Company") are required to file an annual Renewable Energy Standard ("RES") Compliance Report ("Report") that contains the information set forth in the rule. In general, the Report is designed to give the Commission a status on the QRU's compliance with the renewable energy standard for the most recently completed compliance year.

Upon receipt of the annual compliance report, the Commission is to provide notice to interested persons. Interested persons then have 30 days within which to provide comment to the Commission on the content of the annual compliance report. The QRU shall then have the opportunity to reply to all comments on or before 45 days following the filing of the annual compliance report.

60 days after the Report is filed, Staff is to make a recommendation as to whether:

- (1) no action should be taken because the QRU has met the standard and correctly calculated the on-going annual net incremental costs for new eligible energy resources;
- (2) changes are needed to the report; or, a hearing is required.

Once Staff has made its recommendations, the Commission then enters an order stating whether:

- (1) The QRU complied with the renewable energy standard during the most recently completed compliance year;
- (2) The QRU satisfied the requirements for renewable distributed generation during the most recently completed compliance year;
- (3) The QRU has correctly calculated the on-going annual net incremental costs for new eligible energy resources; and
- (4) A hearing is necessary or not.

Public Service is providing this Report in compliance with Rule 3662, and is pleased to report that it is in compliance with Colorado's 2012 Renewable Energy Standard, consistent with the Company's Commission-approved 2012 RES Compliance Plan.

With respect to the calculation of the incremental costs of eligible energy resources, the need for certain adjustments was discovered as part of an investigation related to the allocation of costs between the Renewable Energy Standard Adjustment ("RESA") and the Electric Commodity Adjustment ("ECA"). In this report and, more specifically Attachment G to this Report, we describe these adjustments.

These adjustments ultimately resulted in the fact that for 2010, 2011 and 2012, the Company did not transfer from the RESA to the ECA all of the energy costs attributable to the generation from the on-site solar facilities installed under our Solar*Rewards® program. Thus, for these time periods the RESA account was charged approximately \$26.2 million more than it should have been charged for these resources. Stated

another way, between 2010, 2011 and 2012, \$26.2 million in costs should have been transferred from the RESA to the ECA to be collected through the ECA.

Thus, as part of our 2012 RES Compliance Plan report filing we have also filed a motion asking that the Commission approve these revised calculations. We have also filed contemporaneously with this 2012 RES Compliance Plan report a separate advice letter that proposes to revise our ECA tariff to permit us to recover these amounts from the ECA over a twelve month period. Our tariff would permit us to recover these amounts through the ECA only upon Commission approval of the proposal.

II. Overview of the Company's Efforts to Meet the Renewable Energy Standard

Public Service remains well-positioned to meet Colorado's RES. The RES requires the Company to cause to be generated 30 percent of electric retail sales from renewable resources by 2020 with 3 percent of that energy coming from renewable distributed generation. The Company is committed to pursuing a balanced strategy that reflects a desire to protect the environment while following through on our commitment to produce clean energy while maintaining reliable service at an affordable price. In this portion of the report, we briefly describe some of our efforts to meet these commitments.

A. Wind

Wind energy continues to play a significant role in the Company's renewable portfolio. Today, Xcel Energy is the No. 1 provider of wind energy in the nation for the ninth consecutive year, according to the American Wind Energy Association. At the end of 2012, Public Service had 2,172 megawatts of wind energy capacity on its system and

Xcel Energy had nearly 5,000 megawatts across its various utility operating companies. The Company continues to set records and milestones for wind integration; in fact, on April 15, 2012, a Company record was set by serving nearly 57 percent of its electricity load in Colorado with wind energy during one early morning hour.

Wind power has become an important component to our balanced energy mix as we have increased its use and worked to improve our ability to integrate wind into our system. Last year in Colorado we added approximately 400 megawatts of wind power to our system through cost-effective, long-term power-purchase agreements. At the end of the year, the twin 200-megawatt Limon I and II Wind Energy Centers owned and operated by NextEra Energy Resources began supplying some of the lowest cost wind energy on our system. Located about 90 miles southeast of Denver, each of the Limon projects consists of 125 GE 1.6-megawatt wind turbines spread across more than 55,000 acres in Arapahoe, Elbert and Lincoln counties in Colorado.

There was a huge push among wind developers to complete projects by the end of 2012 because of uncertainty around extension of the Production Tax Credit ("PTC") for wind energy. Xcel Energy was active in discussions around the PTC, and we were pleased to see the PTC extended. The PTC will continue to provide significant benefits to our customers by enhancing the cost-effectiveness of wind energy.

B. Solar

Solar energy continues to play an important role in the Company's renewable energy portfolio. We are one of the nation's top 10 electric utilities based upon the amount of solar power on our system and according to the Solar Electric Power Association we were ranked No. 5 for solar capacity in 2012. The Company purchases utility-scale solar

generation from four sizable solar installations located in the San Luis Valley in south-central Colorado. These installations include the SunEdison Alamosa facility (7 megawatt AC) and the SunPower Greater Sandhill facility (16 megawatt AC). In early 2012, we also began purchasing power from two newly constructed, world-class projects: Iberdrola's 30 megawatt AC San Luis Solar facility that relies on 110,000 photovoltaic modules; and the 30 megawatt AC Cogentrix of Alamosa solar project that employs a high-concentration photovoltaic technology and is the largest facility of its type in the world.

Through net metering and other incentives Public Service continues to offer Colorado customers incentives to install solar panels on their homes and businesses through its Solar*Rewards® rooftop solar program. Installations continue to thrive and Colorado customers continue to take advantage of those incentives. More than 3,200 photovoltaic systems were installed in Colorado in 2012, with a capacity of nearly 32 megawatts (DC). Since the program's 2006 launch through the end of 2012, a total of 12,840 systems have been installed under the Solar*Rewards® program.

The Colorado Solar*Rewards® program moved completely to performance-based incentives in 2012, with the majority of installed systems coming from the small third-party developer portion of the program. This program permits customers to lease systems from third parties but still obtain the benefits of the Solar*Rewards® program. Additionally, after supporting state legislation allowing for the creation of community solar gardens, we launched the Solar*Rewards® Community program. This program provides a solar energy option for customers who cannot or do not want to have a solar installation on their roof. Under the program, a subscriber organization can install a

community solar garden and receive production incentives from Public Service. Subscriber organizations sell or lease interests in the garden to subscribing customers. Net metering remains part of the incentive mechanism for this program. However, unlike a Solar*Rewards® customer, a Solar*Rewards® Community subscribers' net metering credit is reduced by a reasonable charge as approved by the Commission to cover the embedded costs of the Company's transmission and distribution system that is used to serve Solar*Rewards® Community subscribers' energy needs, and administering the community solar gardens contracts and net metering credits.

To keep pace with technological advancements and address emerging issues, we participate in a number of successful, collaborative efforts. Through these partnerships we are able to join with others to learn about, test and promote technologies that offer the greatest promise for solving environmental concerns and providing customers with reliable, cleaner energy at a reasonable cost. The Solar Technology Acceleration Center ("SolarTAC") in Aurora, Colorado is just one example of such a partnership. SolarTAC is a world-class facility used to demonstrate and validate some of the most advanced solar technologies available. There are seven founding and sponsoring members. These members occupy 90 percent of the 74-acre site and have invested approximately \$30 million in SolarTAC.

The Company recognized the benefit to our customers early on and became SolarTAC's original founding member. We are currently testing two battery storage projects at SolarTAC. The first uses a large 1.5-megawatt battery to smooth energy fluctuations at large-scale solar installations. These fluctuations can occur when solar output changes rapidly due to cloud cover or other factors. In the second project, we

are examining how smaller battery technology can mitigate the effects of high solar penetration in residential areas. A 25-kilowatt battery is connected to four simulated homes powered by photovoltaic panels, modeling solar integration in a neighborhood.

The Company is also working with the Electric Power Research Institute ("EPRI") and its members on a smart inverter project that should improve the integration of solar power into utility systems.

C. Windsource®

The Company's Windsource® program began in 1998 and continues to be one of the largest voluntary green-energy programs in the United States. The current structure of today's Windsource® program originated in the terms of a settlement agreement the Commission-approved in Docket No. 08A-260E. Under the settlement agreement Windsource® customers receive renewable energy credits from the Company's entire eligible eEnergy resource portfolio. Premiums from sales under the Windsource® program are credited back through to the RESA, In 2012, 33,633 residential and commercial/industrial customers purchased 201,239 megawatt hours of renewable energy credits and contributed \$4,316,710 to the RESA account.

Windsource® is certified through the Green-e Energy program. To be Green-e Energy certified, the corresponding RECs associated with the energy sold under Windsource® cannot be used to fulfill a state renewable energy goal, and cannot be "double-counted" towards that goal, with one exception. Pursuant to Green-e's National Standard Version 2.1: "If the product meets 100% of a customer's electricity use with eligible renewables, Green-e Energy allows a percentage of a product's content to be satisfied by renewable portfolio standard ("RPS") state-mandated renewables up to the

percentage RPS requirement." Consequently, for Windsource® customers who purchased all of their electricity under the Windsource® program in 2012, twelve percent of the RECs associated with the energy they purchase were retired to meet the Renewable Energy Standard. The Commission approved this methodology as part of the Company's 2010 RES Compliance Plan in Decisions No. C10-1033 and R10-0586 in Docket No. 09A-772E. Information describing the method of retiring RECs for 100% Windsource® customer sales has been provided to our Windsource® customers and has been posted on the Windsource® pages on Xcel Energy's website, http://www.xcelenergy.com/Save Money & Energy/For Your Home/Renewable Energy-Programs/Windsource for Residences - CO.

The Company charges a Windsource® premium to those customers that subscribe to the program. The rate is calculated in accordance with Commission Decision Nos. R09-0117, C10-1033 and C10-1221 entered in Docket Nos. 08A-260E and 09A-772E. In Decision No. C10-1221 Docket No. 09A-772E the Commission also directed that the Windsource® premium be recalculated annually, and that the premium need not be changed unless the recalculated premium was 20 percent more or less than the then current rate.

In the Company's 2012 RES Compliance Plan, the Company used the approved methodology for calculating the Windsource® premium. The recalculated premium was \$19.64 per MWh, which was approximately 9% less than the current premium of \$21.58 per MWh. Because the recalculated premium was within the 20 percent collar, the Company did not adjust the Windsource® premium for 2012 – 2013 compliance years. The Commission approved the Windsource® rate for these compliance years.

III. Results of the 2012 Compliance Plan

Public Service filed its 2012 RES Compliance Plan ("Plan") on May 13, 2011. In the Plan the Company outlined its acquisition plans for non-solar, central solar, and on-site solar eligible energy resources. Under the Commission's RES rules in effect during 2012, the Company was obligated to generate or cause to be generated certain amounts of energy from solar and non-solar resources as a percentage of its retail electric sales. For 2012 the compliance requirement was that 12 percent of electric energy sales be served from renewable energy, with 1 percent from distributed generation. One-half of the distributed generation must be from Retail Distributed Generation.

In the 2010 session the General Assembly enacted HB 10-1001 which again increased the RES to 30 percent by 2020. The 2 percent retail rate impact was not increased. Another significant change brought about through enactment of HB10-1001 was the elimination of a solar-specific renewable energy standard. The standard was replaced with a much higher renewable distributed generation standard.

HB10-1001 created two types of distributed generation: (1) retail distributed generation ("Retail DG"), defined as a renewable energy resource that is designed primarily to provide electric energy to serve the customer's load which is located on the site of a customer's facilities and interconnected on the customer's side of the utility meter; and, (2) wholesale distributed generation ("Wholesale DG"), defined as a renewable energy resource in Colorado with a nameplate rating of thirty megawatts or less that does not qualify as retail distributed generation. At least one-half of the renewable distributed generation standard must be met with Retail DG.

Rule 3659(a) states that Renewable Energy Credits ("RECs") will be used to comply with the RES. The Rules define each REC to mean a contractual right to the full set of non-energy attributes, including any and all credits, benefits, emissions reductions, offsets, and allowances, howsoever entitled, directly attributed to a specific amount of electric energy generated from an Eligible Energy Resource. One REC results from one megawatt-hour ("MWh") of electric energy generated from an Eligible Energy Resource.

A. Non Distributed Generation

As a result of the 2007 Colorado Resource Plan and subsequent filings, the Company has acquired approximately 900 MW of additional wind generation. The first 500 MW of wind became fully operational in 2011 and is expected to generate approximately 1,691,500 MWh annually. In addition, the 200 MW Limon I and 200 MW Limon II wind facilities became operational in November 2012. These facilities are expected to generate approximately 1,680,000 MWh annually. The energy purchased from all of these facilities in 2012 is eligible for the 1.25% in-state REC multiplier when used for compliance.

B. Wholesale DG

The Commission approved the acquisition of SunE Alamosa 8.2 MW (7 MW AC) solar facility in the San Luis Valley in 2007 by Decision No. C07-0100. In response to bids received in its 2008 Solar Resource RFP, the Company executed a Solar Energy Purchase Agreement ("SEPA") with Greater Sandhill 1, LLC for a new 19.2 MW DC (16.1 MW AC) photovoltaic facility located in the San Luis Valley of Colorado. The Commission approved the contract finding it to be in the public interest. The energy

purchased from this facility is eligible for the 1.25% in-state REC multiplier for compliance. In addition, the Cameo Solar Demonstration Project generated 550 RECs in 2012. In accordance with its approved 2007 Colorado Resource Plan the Company also acquired through power purchase agreements the full output from two-30 MW solar facilities that are located in the San Luis Valley (San Luis Solar and Cogentrix),. See Decision No. C09-1257. The San Luis Solar and Cogentrix projects (30 MW AC each) came on line in 2012 and are forecast to generate approximately 153,600 MWh annually.

C. Retail DG

In 2012, the Solar*Rewards® program was being offered under the March 2011 Commission-approved settlement¹, which ended on June 8, 2012 when the Commission approved the Company's 2012 RES Compliance Plan. The Solar*Rewards® program closed briefly thereafter to allow for administrative transition and the preparation of the new program offerings. On June 20, 2012, the program reopened under the terms of the 2012 Compliance Plan, offering designated capacity limits and REC price levels for the Small and Medium programs. One notable change was the elimination of an upfront rebate in the Small Customer-owned program. With this change the Company completed the transition to 100% performance based incentives across all programs. Also in 2012, the Medium Tier 1 and Tier 2 programs were combined into one program offering with a single MW capacity limit.

The Company tracked program participation and capacity limits daily, and updated the Company's external website with this information. Due to demand, capacity

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¹ Settlement approved in Docket No. 11A-135E by Decision No C12-0606

limits were reached prior to the end of the year, resulting in the closure of the Small program on December 4, 2012, and the closure of the Medium program on December 18, 2012. Both programs remained closed until January 1, 2013.

Also in 2012, the Company offered a large program RFP for up to 4 MW. Bid evaluation, which occurred in the fourth quarter, resulted in the acceptance of 2 projects under the program, for a total of 2.623 MW.

Finally in 2012, the Company opened the new Solar*Rewards® Community program in August through both a standard offer and a large RFP offer. Based on a first come first serve application process the Company approved 10 community solar garden projects for a total of 4.5 MW in the standard offer program. Through the RFP program the Company approved 3 additional projects for a total of 4.5 MW. The very successful launch of the Solar*Rewards® Community program was a highlight for the Company in 2012.

IV. Adjustments to Transfers Between the RESA and the ECA

As we stated in our petition seeking permission to file this 2012 RES Compliance Report on or before July 15, 2013, the Company investigated certain accounting entries used in allocating costs of eligible energy resources between the RESA and the ECA. In order to ensure the correct accounting allocations were used to calculate the RESA balance, the Company requested and obtained additional time to complete its investigation and prepare the necessary spreadsheets and supporting documents for the 2012 RES Compliance Report. See Decision No. C13-0644-I in Docket No. 13V-0591E.

In order to explain the adjustments that flowed from the investigation, it is necessary to briefly explain the interplay between the RESA and the ECA and how these accounts are used to pay for the costs of the resources acquired and what cost are charged to each deferred account.

Consistent with its approved 2010, 2011, and 2012 Compliance Plans, in these years the Company used the ECA deferred account as a true-up mechanism to ensure full recovery of the costs of eligible energy resources. The lone exception to this was those resources acquired under the Solar*Rewards® program.

In general under this true-up mechanism the incremental costs associated with eligible energy resources -- except those acquired under the Solar*Rewards® program - are initially charged in full against the ECA. The Company then conducts computer modeling to determine the incremental costs per MWh of the eligible energy resources. These costs are derived by calculating the cost difference between the RES Plan and the No RES Plan modeling runs. The incremental costs of the eligible energy resources are then transferred from the ECA deferred account to the RESA deferred account. This transfer ensures that the ECA is not charged for the incremental costs of the eligible energy resources. This transfer also ensures that the RESA deferred account is assessed the total incremental costs of the eligible energy resources. The Commission approved this cost recovery mechanism in Decision No. C09-1037 in Docket No. 08A-532E and reaffirmed its approval of the mechanism in Decision Nos. R10-0586 and C10-1033.

The lone exception to this accounting process for allocating costs between the RESA and the ECA is for those costs associated with resources acquired under the

Solar*Rewards® program. All of the costs of this program are initially charged against the RESA deferred account. The modeled "Avoided Energy Costs" of the resources acquired under the Solar*Rewards® program are then transferred from the RESA deferred account to the ECA deferred account. After the transfer, only the incremental costs of the generation acquired under the Solar*Rewards® program remains in the RESA deferred account. This transfer also ensures that the ECA is only charged for the energy attributable to the on-site solar generation installed under our Solar*Rewards program at our "Avoided Energy Cost".

Thus, in 2010, 2011 and 2012, all of the costs of the Solar*Rewards® program were initially charged to the RESA deferred account. The next month, the modeled "Avoided Energy Costs" related to the resources acquired under the Solar*Rewards® programs were transferred from the RESA deferred account to the ECA deferred account.

As is explained in further detail in Attachment G to this report, the investigation to which the Company referred in its petition for a variance primarily consisted of, among other things, reviewing and verifying the production volumes of all resources whose incremental costs impact the RESA. This review was conducted for all volumes from 2010 forward.

In addition, prior to 2011, customers that installed on-site solar systems installed as part of the Solar*Rewards® program were paid rebates and REC payments up front. The team discovered that as a result of this fact, the Company charged all 20 years worth of the energy costs attributable to these systems to the RESA in the year the system was installed. At the time that these costs were recognized in the RESA

balance, annual transfers between the RESA and the ECA in the amount of the avoided energy costs attributable to these systems began. However, although the transfers occurred, the correct amount of Avoided Energy Costs were not transferred from the RESA to the ECA. In order to correct this issue, an adjustment is needed that transfers the monthly avoided energy cost from the RESA deferred account to the ECA deferred account using the production of these systems over the 20 year term.

All of the adjustments identified in Attachment G to this Report result in the fact that for 2010, 2011 and 2012, the Company did not deduct from the RESA and charge to the ECA the full energy costs attributable to the generation from the on-site solar facilities installed under our Solar*Rewards® program. Thus, for these time periods the RESA account was charged approximately \$26.2 million more than it should have been charged for the Avoided Energy Costs of these resources.

In order to reflect the results of our investigation and the accounting adjustments that resulted from that investigation, we are expanding the supporting documents that accompany this 2012 RES Compliance Report. As is further explained in Attachment G to the report, certain supporting Attachments are provided for not only for 2012 but for 2010 and 2011 as well. These supporting Attachments provide the accounting details that show the effect of all of the adjustments described in Attachment G, including our review and verification of all production volumes and incremental costs in those years.

Although this is a RES Compliance Report for 2012, it is necessary to make adjustments for the 2010 and 2011 Compliance Years that are similar to those being recommended for the 2012 Compliance Year.

V. Statement of RES Compliance

For 2012 the RES required that 12 percent of the Company's electric energy sales be served from renewable energy, with 1 percent from distributed generation. One-half of the distributed generation must be from Retail Distributed Generation. Public Service is pleased to report that the Company is in compliance with the Colorado 2012 RES standard. As a result of acquiring the generation described above, including the generation from the Limon I and Limon II wind facilities, Public Service has sufficient RECs to meet its RES obligation for the 2012 Compliance Year. Public Service also projects that under the current RES standards it will have sufficient Non DG RECs from existing Eligible Energy Resources for RES compliance beyond 2030.

As a result of: 1) entering into agreements to acquire the output from the Greater Sandhill, San Luis Solar and Cogentrix projects; 2) entering into agreements to acquire the output from 5 wind projects under 30 MW; 3) the acquisition of output from certain hydro and biomass projects approved in previous RFPs; and, 4) other generation owned or contractually acquired by the Company in prior periods, Public Service has sufficient Wholesale DG RECs to meet its RES obligation for the 2012 Compliance Year. In addition, Public Service projects that under the current RES it will have sufficient Wholesale DG RECs from existing Eligible Energy Resources to comply with the RES beyond 2020.

As a result of the Company's Solar*Rewards® program and now Solar*Rewards® Community program, the Company also has sufficient Retail DG RECs to meet it RES Obligation for 2012 Compliance Year. In addition, because of Public Service's early Solar*Rewards® program acquisitions, the Company projects that under

the current RES it will have sufficient Retail DG RECs from existing customer sited solar resource to comply with the RES beyond 2020.

A. REC Tracking

The Company tracks RECs through an internal REC tracking systems and the Western Renewable Energy Generation Information System ("WREGIS") system. Commission Rule 3659 (j) requires all renewable energy resources 1 MW and larger to be registered with WREGIS. WREGIS is a third-party REC tracking and verification system for the western states (including Colorado), developed through a collaborative effort between the Western Governors Association, the Western Regional Air Partnership, and the California Energy Commission. Public Service, through Xcel Energy Services Inc. ("XES"), the service company subsidiary of Xcel Energy Inc., participates in the Stakeholder Advisory, Policy and Change Control Committees of WREGIS. Public Service believes that WREGIS and other regional REC tracking and verification systems add significant credibility to, and aid in the development of, REC markets. Xcel Energy's registered generating facilities have been uploading data to WREGIS since the last quarter of 2008.

During the 2012 Compliance Year the Company used its internal REC tracking database to retire all RECs for 2012 RES compliance. Any WREGIS RECs that were used for 2012 compliance or Windsource[®] were also be retired in WREGIS. During the 2012 Compliance Year the Company maintained the internal REC tracking database and WREGIS in tandem, to ensure synchronization between the two systems.

B. Demonstration of Compliance

In order to demonstrate compliance with the Colorado 2012 RES we have included several attachments to this report providing the data identified in Rule 3662, the text of which is set forth in Attachment A, Rule Requirements.

Attachment B shows the Company's 2011 actual energy sales and resulting Renewable Energy Standard compliance requirements.

Attachment C, Renewable Energy Credit Compliance Summary, is similar to Tables 4-2 and 4-3 as originally filed in our 2012 RES Compliance Plan, Volume 2. The numbers reflect actual RECs for 2012.

Attachment D compares the 2012 RESA forecasted expenditures and revenues to the actual expenditures and revenues. It also compares the 2012 forecasted RESA deferred account balance and the 2012 actual RESA deferred account balance. The Company designed this Attachment so that it reflects the relevant information contained in Table 7-3 as originally filed in our 2012 RES Compliance Plan, Volume 2. Although Attachment D reflects the actual totals by column, it also contains a breakdown of the actual costs of the resources by individual resource. This segregation of costs by resource permits one to easily of assess the resources that contributed to the actual totals for 2012.

Attachment E is comprised of three pages, one for each year from 2010 through 2012. Each Attachment sets forth each individual resource whose costs are allocated between the RESA and ECA. First, these Attachments provide the incremental costs for each resource expressed as \$/MWh as charged in that year. Set forth at the bottom of the attachment are the adjustments, if any, made to the \$/MWh figure. Second, these

Attachments show the recorded volumes for each resource. Below that are reflected adjustments, if any, to the volumes. Third, the final rows of each of these Attachments reflect the total adjustments made, consistent with the investigation discussed in Section IV above.

Attachment F also has three pages, one for each year 2010 through 2012. As part of Recommended Decision No. R12-0261 concerning the Company's 2012 RES Compliance Plan, the Administrative Law Judge directed the Company to make an annual filing that details the annual costs of all renewable energy resources -- not just those impacting the RESA. The Company was also ordered to report the corresponding cost recovery mechanism used to recover those costs. Attachment F complies with this requirement and is being provided for years 2010 through 2012. Attachment F Adjusted reflects the adjustments described in Section IV above and in further detail in Attachment G.

As part of Commission Decision C11-1080 approving the Company's 2010 RES Compliance Plan, the Commission directed the Company to provide comparisons between the modeled incremental costs and the actual incremental costs of eligible energy resources that are charged against the RESA account, and to provide an explanation of significant deviations. Attachment G explains the differences between the modeled costs and the actual costs of eligible energy resources as reflected in Attachment D. Attachment G also provides further details on the investigation described in Section IV above and the adjustments that resulted from that investigation.

Finally, Attachment H – Highly Confidential and Public provides the acquisitions under the 2012 Request For Proposal issued in the: Large Solar*Rewards® program, as well as all of the acquisitions under the Solar*Rewards® Community program.

Because the Company is not claiming that the retail rate impact cap limitation inhibited its ability to meet the requirements, there is no need to report the data required in Subsection (XV) (c) of Rule 3662.

In compliance with Rule 3662 (XV), the Commission has approved the Company's methodology for calculating the retail rate impact for the 2012 RES Compliance year.² Because the Company is not claiming that the retail rate impact cap limited its ability to comply with the 2012 RES, no modifications pertaining to the calculation of the retail rate impact for 2012 were necessary.

The Company is providing the Commission with an electronic copy of this filing, as well as posting it on the Company's website at www.xcelenergy.com under "Renewable Energy Solutions" in the Renewable Energy Programs directory.

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² Volume 1, Section 7 of the Company's 2012 RES Compliance Plan filed in Docket No. 11A-418E provides a detailed description of the Company's retail rate impact calculation methodology.