

---

**From:** PUC

**Sent:** Monday, July 26, 2021 4:36 PM

**To:** [REDACTED]

**Subject:** EL21-019

Mr. Kelley,

This is in response to your comments related to Xcel Energy's Rates for Small Power Production and Cogeneration, docket EL21-019.

The Public Utilities Commission staff reviews all Small Power Production and Cogeneration filings in accordance with the federal Public Utilities Regulatory Policies Act, the Federal Energy Regulatory Commission's implementing regulations, and South Dakota law. At this time, neither the South Dakota Legislature or the United States Congress have passed laws requiring utilities to include the externalities you listed in each utility's avoided cost calculation for Small Power Production and Cogeneration rates.

PUC staff will continue to review these types of dockets in accordance with the direction provided by federal and state laws and rules. In order to meet legal requirements and withstand judicial review, PUC staff's recommendation as to whether the proposed rate is reasonable will be based on quantifiable facts and figures in light of the entire petition and information in the docket at the time of review.

Your message and this response will be posted under Comments and Responses in docket [EL21-019](#).

South Dakota Public Utilities Commission Staff  
[PUC.sd.gov](http://PUC.sd.gov)