

December 9, 2019

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: Letter from the Minnesota Department of Commerce, Division of Energy Resources regarding Northern States Power Company, doing business as Xcel Energy's Petition for Approval of its 2019 and 2020 Transmission Cost Recovery Rider and Resulting Adjustment Factors by Customer Class in Docket No. E002/M-19-721

Dear Mr. Wolf:

On November 15, 2019, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) filed a petition requesting approval of its 2019 and 2020 Transmission Cost Recovery Rider (TCR) and Resulting Adjustment Factors by Customer Class (Petition). If approved as filed, Xcel's proposal would result in a rate decrease for ratepayers.

At its December 3, 2015 agenda meeting, in light of the then-extensive workload, especially the significant number of contested cases with statutory deadlines, the Minnesota Public Utilities Commission (Commission) suggested that the Minnesota Department of Commerce (Department) consider notifying the Commission and other parties, on a case-by-case basis, when there were proceedings in which the Department would likely require extended time extensions. Given that there are four and potentially five contested rate cases (possibly including the Company's proposed general rate case in Docket No. E002/GR-19-564), along with numerous proceedings involving policy matters, regulatory workload is again extensive.

The Company's request for an update to its TCR at this time, while commendable in light of the proposed reduction in rates, comes on top of this significant work load burden on the Commission and the Department. Further, efforts to process Xcel's previous TCR petition only recently concluded, so those rates have been updated.

Given that Minnesota Statutes, Section 216B.03 specifies that, "Any doubt as to reasonableness should be resolved in favor of the consumer," and because the Petition results in a rate reduction, the Department requests that the Commission grant provisional approval of Xcel's Petition, with the understanding that a final decision on these matters will be made subsequent to receipt of interested parties' comments.

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Due to the interplay between this Petition and Xcel's pending rate case, along with deadlines in rate cases of Dakota Electric Association, Great Plains, CenterPoint Energy, and Minnesota Power, the Department requests that the comment deadline be set sometime after July 31, 2020, which the Department estimates to be a reasonable date, based on the information known at this time.

Thank you for your consideration of this request.

Sincerely,

/s/ MARK A. JOHNSON
Public Utilities Analyst Coordinator

MJ/ar

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
Letter**

Docket No. E002/M-19-721

Dated this **9th** day of **December 2019**

/s/Sharon Ferguson

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