



414 Nicollet Mall  
Minneapolis, MN 55401

February 15, 2018

—Via Electronic Filing—

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

RE: REPLY COMMENTS  
REQUEST FOR VARIANCE - BILLING ERROR RULES  
DOCKET NO. E002/M-18-27

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits this Reply to the February 5, 2018 Comments of the Minnesota Department of Commerce, Division of Energy Resources on our request for a one-time variance to billing error rules in the matter referenced above.

We appreciate the Department's recommendation that the Commission approve our request. In response to the Department's request for clarification, a "non-billing rate" is an internal term and concept we use in circumstances when we only need to monitor, rather than bill, the consumption or output of a meter. For example, with a reactive meter that is only needed to calculate a power factor, or when a customer has a time-of-day meter, but is not on a time-of-day rate.

We respectfully request the Commission approve our request as supplemented by this Reply. We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

Please contact Pamela Gibbs at [pamela.k.gibbs@xcelenergy.com](mailto:pamela.k.gibbs@xcelenergy.com) or (612) 330-2889 if you have any questions regarding this filing.

Sincerely,

/s/

GAIL A. BARANKO  
REGULATORY MANAGER  
c: Service List