414 Nicollet Mall
Minneapolis, Minnesota 55401

June 24, 2015

—Via Electronic Filing—

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

RE: PETITION
EXTENSION OF GAS CAPACITY UTILIZATION ACCOUNTING TREATMENT
DOCKET NO. E,G002/M-15-____

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission a Petition for approval of a permanent extension of the accounting treatment for the natural gas capacity utilization plan for our gas distribution and electric generation business units. The Commission approved a three-year pilot in its Order dated February 18, 2010, in Docket. No. E,G002/M-09-852.

We have electronically filed this document with the Commission. A Summary of the filing has been served on all parties on the attached service list. Please contact me at paul.lehman@xcelenergy.com or 612-330-7529 if you have any questions regarding this filing.

Sincerely,

/s/

PAUL J LEHMAN
MANAGER, REGULATORY COMPLIANCE AND FILINGS

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF ACCOUNTING TREATMENT FOR THE CAPACITY UTILIZATION PLAN FOR ITS GAS DISTRIBUTION AND ELECTRIC GENERATION BUSINESS UNITS

DOCKET NO. E,G002/M-15-___

PETITION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission, a request for a permanent extension of its Capacity Utilization Plan. The accounting treatment allowed by the plan will permit natural gas transportation capacity sharing between the Company's gas distribution and electric generation business units resulting in more efficient use of transportation capacity.

Due to differing seasonal peaks, NSP Gas or NSP Generation may have available capacity that would be a lower or equivalent cost option for the other business unit to use.[1] Sharing the capacity between those two business units, with appropriate safeguards to accurately allocate costs to the appropriate customers, optimizes the current levels of capacity rather than incurring additional charges in the marketplace. This was tested through a pilot of the mechanism approved by the Commission in its February 18, 2010 Order in Docket No. E,G002/M-09-852.

Over the course of the three-year pilot, the plan resulted in about $249,000 of net savings for natural gas customers and about $202,000 of net savings to electric

[1] NSP Gas includes natural gas transportation capacity and storage contracts for the gas distribution functions in Minnesota and North Dakota. NSP Generation includes natural gas transportation capacity and storage contracts for the electric portfolios in Minnesota, North Dakota and South Dakota.

customers. The savings were passed on to retail natural gas and electric customers through the Fuel Clause Adjustments (FCA), Purchased Gas Adjustments (PGA), and related true-ups. We anticipate that potential upcoming changes to natural gas and electric markets deadlines proposed by the Federal Energy Regulatory Commission (FERC) could further increase the net benefits of the plan.

Our request is in the public interest because, as the pilot program demonstrated, the plan provides efficiencies as well as cost-saving benefits for our customers. Expenses that would otherwise be paid to third parties are instead paid to NSP Gas or NSP Generation, depending on the situation.

The Commission last approved this mechanism for a three-year period in Docket No. E,G002/M-09-852, which expired on February 18, 2013. Due to an administrative oversight, the Company continued to use the plan on five occasions after the expiration of the pilot program. The Company apologizes for this oversight and respectfully requests approval of a permanent Capacity Utilization Plan.

I. SUMMARY OF FILING

A one-paragraph summary of the filing accompanies this petition pursuant to Minn. R. 7829.1300, subp. 1.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. Stat. § 216.17 subd. 3 and Minn. R. 7829.1300, subp. 2, Xcel Energy has electronically filed this petition. A summary of the filing has been served on all parties on Xcel Energy's miscellaneous gas and electric service list.

III. GENERAL FILING INFORMATION

Pursuant to 7829.1300, subp. 3, Xcel Energy provides the following required information:

A. Name, Address, and Telephone Number of Utility

Northern States Power Company,
a Minnesota corporation
414 Nicollet Mall
Minneapolis, Minnesota 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Alison C. Archer
Assistant General Counsel
Xcel Energy Services Inc.
414 Nicollet Mall – 5th Floor
Minneapolis, Minnesota 55401
(612) 215-4662

C. Date of Filing

Xcel Energy submits this petition for approval on June 24, 2015.

D. Statute Controlling Schedule for Processing the Filing

We file this Petition pursuant to Minn. Stat. § 216B.10, which grants the Commission jurisdiction over the accounting practices of public utilities. We believe that this filing falls within the definition of a "miscellaneous tariff filing," under Minn. R. 7829.0100, subp. 11, because no determination of Xcel Energy's general revenue requirement is necessary. Minn. R. 7829.1400, subps. 1 and 4, permits comments in response to a miscellaneous filing within 30 days of filing, with reply comments 10 days thereafter.

We note that we do not believe the transactions contemplated in this filing constitute affiliated interest transaction as defined in Minn. Stat. §216B.48, subd. 1. NSP Gas and NSP Electric Generation are not separate legal entities; they are separate business areas within one utility.

E. Utility Employee Responsible for Filing

Paul J Lehman
Manager, Regulatory Compliance and Filings
Xcel Energy Services Inc.
414 Nicollet Mall – 7th Floor
Minneapolis, Minnesota 55401
(612) 330-7529

IV. DESCRIPTION AND PURPOSE OF FILING

A. Background

We filed a petition on July 17, 2009 in Docket No. E,G002/M-09-852 requesting approval of proposed accounting treatment in the Gas Capacity Utilization Plan. The Commission approved the program on February 18, 2010 as a three-year pilot.

Over the course of three years, the pilot resulted in a net savings to NSP Gas of approximately $249,000 (which includes capacity sharing transaction savings of approximately $128,000, storage diversion savings of approximately $1,000, and avoided storage fees of approximately $119,000 through storage nettings). Details can be found below in Table 1.

During the three years of the pilot, NSP Generation realized approximately $202,000 of net savings (which includes a cost of approximately $128,000 for capacity sharing transactions, a cost of approximately $1,000 of storage diversion transactions, and approximately $332,000 of savings through storage netting). Details can be found below in Table 2.

For capacity sharing and storage diversion transactions, a savings to NSP Gas results in a cost to NSP Generation and vice versa. However, we note that the cost incurred by the jurisdiction utilizing shared capacity would have been incurred anyway even if the capacity sharing program were not in place. The program simply ensures that payments for excess transportation capacity are directed to NSP customers instead of third parties when possible. The savings realized under the pilot were passed on to retail natural gas and electric customers through the FCA, the PGA, and related true-ups.

Due to an administrative oversight, we continued to use the Gas Capacity Utilization Plan mechanism on five occasions after the expiration of the variance on February 18, 2013. The resulting savings to natural gas customers during the 2013-2014 period can be seen below in Tables 1 and 2 and were reported in the 2014 Gas Annual Automatic Adjustment (AAA) of Charges Report on August 29, 2014.[2]

Table 1: Savings and Costs to Natural Gas Customers Since 2010

	Pilot Period				
True-up year (July – June):	**2010-2011**	**2011-2012**	**2012-2013**	**2013-2014**	**2014 – April 2015**
Capacity Sharing Savings	($37,773)	($76,966)	($18,300)	($9,535)	$0
Capacity Sharing Costs	$4,885	$0	$0	$0	$0
Storage Diversion Savings	($1,338)	$0	$0	$0	$0
Storage Diversion Costs	$0	$0	$0	$0	$0
Storage Netting Savings	($28,188)	($36,626)	($54,505)	($59,053)	($17,033)
Total	($62,414)	($113,592)	($72,805)	($68,588)	($17,033)

[2] Docket No. G999/AA-14-580.

Table 2: Savings and Costs to Electric Customers Since 2010

	Pilot Period				
True-up year (July – June):	**2010-2011**	**2011-2012**	**2012-2013**	**2013-2014**	**2014 – April 2015**
Capacity Sharing Savings	($4,885)	$0	$0	$0	$0
Capacity Sharing Costs	$37,773	$76,966	$18,300	$9,535	$0
Storage Diversion Savings	$0	$0	$0	$0	$0
Storage Diversion Costs	$1,338	$0	$0	$0	$0
Storage Netting Savings	($56,711)	($83,702)	($191,132)	($154,957)	($86,231)
Total	($22,484)	($6,735)	($172,832)	($145,422)	($86,231)

B. Potential Upcoming FERC Changes

While the benefits realized during the pilot program were modest, based on changes to natural gas and electric market timelines required by FERC in Order 809 issued on April 16, 2015, we anticipate the net benefits of the program may increase. The FERC order requires that natural gas pipelines move the deadline for the timely nomination cycle by which the first traunch of gas for each gas day must be scheduled back one and one half hours from 11:30 central prevailing time (CPT) to 13:00 CPT to provide generators with more time to formulate generation operations plans for the next day. An additional intraday scheduling cycle for natural gas will also be added to provide generators with increased flexibility to adjust to changing fuel requirements in real time.

The purpose of these FERC changes is to improve electric grid reliability by minimizing variances between the gas and electric markets that can contribute to fuel constraints during the winter. With greater certainty around gas requirements for generation before the timely nomination cycle deadline, the Company will also have more certainty around the availability of firm pipeline transportation capacity for sharing while there is still time for scheduling changes in the timely nomination cycle. Even if opportunities for sharing remain limited, customers will still benefit modestly as the pilot demonstrated.

C. Description of the Plan

The Capacity Utilization Plan allows NSP Gas and NSP Generation to use available capacity in each other's portfolios. We believe this improves our natural gas capacity utilization efficiency for pipeline transportation and storage capacity. We outline these opportunities below.

1. *Capacity Sharing*

NSP Generation and NSP Gas both contract for firm transportation services on the Northern Natural Gas (NNG) and Viking Gas Transmission (VGT) systems. Periodically, one entity may not be using all of its contracted capacity when the other entity could use the capacity. NSP Gas and NSP Generation effectively purchase firm capacity from each other instead of purchasing interruptible capacity from an interstate pipeline. Following are two examples of how we used this mechanism during the pilot and could use it again in the future.

a. Example 1: NSP Gas Capacity Used by NSP Generation

The first example contemplates a situation when NSP Gas has unused transportation capacity and NSP Generation is able to use a portion of the capacity during a peak situation (this could be the result of a high utilization rate of the plants or to displace oil-fired generation).

This situation occurred on August 3, 2010 when NSP Generation scheduled 36,437 Dekatherms (Dth) of natural gas utilizing excess NSP Gas transportation capacity. Therefore, NSP Generation was charged and NSP Gas was credited $9,207.63 (36,437 Dth * $0.2527), which is the volume scheduled multiplied by the current (at the time of the transaction) maximum NNG interruptible transportation rate.[3] The following table shows the accounting:

Table 2: Example 1 – Capacity Sharing Accounting

	Debit	Credit	Notes
FERC 501.10 or 547.10* (Gas/Other Oper Fuel-Gas)	$9,208		NSP Generation charged
FERC 805.11 (Capacity Release Credits)		$9,208	NSP Gas credited

*Costs are first debited to FERC 151 and then allocated to the respective plants based on monthly burns and expensed to FERC 501 and 547.

[3] As of May 2015, the current maximum interruptible rates on NNG are $0.6091 (November to March) and $0.2512 (April to October).

b. Example 2: NSP Generation Capacity Used by NSP Gas

The second example involves a situation where NSP Generation may have unused transportation capacity and NSP Gas is able to use a portion of the capacity to avoid using the peak shaving facilities during a peak winter situation or reduce the need to curtail interruptible customers.

This situation occurred on February 8, 2011 when NSP Gas scheduled 8,000 Dth of natural gas utilizing excess NSP Generation transportation capacity. Therefore, NSP Gas was charged and NSP Generation was credited $4,884.80 (8,000 Dth * $0.6106), which is the volume scheduled multiplied by the current (at the time of the transaction) maximum NNG interruptible transportation rate. The following table shows the accounting:

Table 3: Example 2 – Capacity Sharing Accounting

	Debit	Credit	Notes
FERC 501.10 or 547.10* (Gas/Other Oper Fuel-Gas)		$4,885	NSP Generation credited
FERC 858 (Transportation charges)	$4,885		NSP Gas charged

*Costs are first credited to FERC 151 and then allocated to the respective plants based on monthly burns and expensed to FERC 501 and 547.

c. Capacity Sharing Impact on Interruptible Customers

We share the Department's concern expressed in previous dockets[4] about firm customers paying for transactions executed for the sole benefit of interruptible customers. For that reason, we propose to identify capacity sharing transactions executed to avoid curtailing interruptible customer usage and allocate the costs of those transactions directly to interruptible customers.

Our proposal is consistent with how we currently handle capacity purchases from interstate pipelines to avoid curtailing interruptible customer usage. Thus, we propose to use the same methodology to allocate costs to interruptible classes in the annual true-up filing.[5] We also propose to track and report two categories of capacity sharing transactions – those used to not curtail interruptible customers and other transactions that benefit the whole system.

[4] Including, but not limited to, Docket Nos. E,G002/M-09-852 and G999/AA-12-756.
[5] Approved in Docket No. G999/AA-12-756, Order dated November 14, 2013.

d. FERC Account 858

Xcel Energy accounting policies and procedures use FERC Account 858.01[6] for third-party pipeline Transport Demand charges, and for third-party Transport Commodity charges use FERC Account 858.03. The logic in using this account for capacity sharing expense transactions is to recognize similar expenses within the same FERC account. This is a similar cost to what we are currently incurring with our third-party vendors.

In order to separately track and report the transactions for the Capacity Utilization Program, we created subaccount 1050 in our accounting system (JD Edwards) instead of creating an additional subaccount to FERC Account 858 as we stated we would do in our 2009 Capacity Utilization Plan petition. We found that functionally we needed the JD Edwards subaccount instead of the FERC subaccount to be able to make the necessary journal entries.

2. Storage Netting

Our 2009 Capacity Utilization Plan petition noted our intent to consolidate our NNG storage contracts and use NNG's storage netting program. We consolidated our NNG storage contracts in June 2010 and began using storage netting in August 2010. Our NNG storage contracts remain consolidated and we continue to use NNG's storage netting program to the benefit of our customers. Unlike capacity sharing, storage netting does not involve one business area using another's assets. Instead, consolidated contracts provide administrative efficiencies, such as with the nomination process, and the opportunity to use NNG's storage netting program.

Through NNG's storage netting program, only the net injection or withdrawal resulting from of NSP Gas and NSP Electric storage daily activity is assessed an injection/withdrawal fee by NNG. Since we continue to track the separate accounts internally, we offer to continue reporting on the savings our customers enjoy because of our NNG storage contract consolidation.

3. Storage Diversion

We initially requested approval of storage diversion as part of our 2009 Capacity Utilization Plan petition. We do not have a need for this function any longer as described below.

[6] FERC Account 858 –*Transmission and compression of gas by others*: This account shall include amounts paid to others for the transmission and compression of gas of the utility.

A storage diversion transaction is when instead of one entity withdrawing gas from storage while the second entity is injecting gas into storage, the gas for injection would be diverted to the first entity's needs and a transfer of storage gas to the second entity would happen "on paper."

The primary purpose of storage diversion transactions was to save on injection and withdrawal fees. However, the consolidation of our NNG accounts discussed above and the resulting use of storage netting effectively does this. We also have gas storage with ANR Storage Company (ANR), but they do not allow counter-season injections/withdrawals, so a storage diversion transaction with ANR stored gas would never be possible.

We only performed four storage diversion transactions during the pilot and they all occurred during the first year of the pilot. By the second year of the pilot, the contracts had been consolidated, storage netting had become effective and we saw no continued benefit to using storage diversion transactions. Accordingly, we do not see a need for continued use of this mechanism at this time.

C. Reporting

As was the case in our pilot, we propose to meet the appropriate accounting and reporting requirements for this program through the PGA, which allows for reporting efficiency while retaining appropriate cost allocations. We will continue to list each transaction along with a brief description, quantities and cost, and specific accounting entries. We would track recovery of the costs and the credits to retail natural gas and electric customers through those adjustments and related true-ups.

In addition we propose to track capacity sharing transactions executed solely for the benefit of interruptible natural gas customers, allocate the costs directly to interruptible natural gas customers, and report on these transactions in the Gas AAA.

V. EFFECT OF CHANGE UPON XCEL ENERGY REVENUE

The accounting treatment provides for recovery of natural gas transportation capacity and storage costs from Xcel Energy's retail customers pursuant to the FCA, PGA and related true-ups, as is the current practice. The additional revenue would be offset by the costs and have no net change on the Company's earnings.

VI. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, Xcel Energy requests that the following persons be placed on the Commission's official service list for this matter:

Alison C. Archer
Assistant General Counsel
Xcel Energy Services Inc.
414 Nicollet Mall – 5th Floor
Minneapolis, Minnesota 55401
Alison.C.Archer@xcelenergy.com

Regulatory Records
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414 Nicollet Mall – 7th Floor
Minneapolis, Minnesota 55401
Regulatory.Records@xcelenergy.com

CONCLUSION

We respectfully request that the Commission approve our request for a permanent extension of the Capacity Utilization Plan. Our proposed plan allows capacity sharing between the Company's gas distribution and electric generation business units in order to allow for more efficient utilization of capacity.

Dated: June 24, 2015

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF ACCOUNTING TREATMENT FOR THE CAPACITY UTILIZATION PLAN FOR ITS GAS DISTRIBUTION AND ELECTRIC GENERATION BUSINESS UNITS

DOCKET NO. E,G002/M-15-___

PETITION

SUMMARY OF FILING

Please take notice that on June 24, 2015, Northern States Power Company, doing business as Xcel Energy, filed with the Minnesota Public Utilities Commission its Petition for approval of a permanent Capacity Utilization Plan. Our proposal would allow the Company to continue to use the mechanism previously approved by the Commission in Docket No. E,G002/M-09-852.

CERTIFICATE OF SERVICE

I, Jim Erickson, hereby certify that I have this day served copies or summaries of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota

xx electronic filing

Xcel Energy's Miscellaneous Gas and Electric Service List

Dated this 24th day of June 2015

/s/
____
Jim Erickson
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
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Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
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Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
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Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
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