



414 Nicollet Mall
Minneapolis, MN 55401

February 18, 2014

—Via Electronic Filing—

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REQUEST FOR CLARIFICATION
TARIFF MODIFICATIONS IMPLEMENTING NET METERED FACILITY
PROVISIONS, STANDBY SERVICE EXEMPTIONS, AND METER AGGREGATION
PURSUANT TO THE 2013 OMNIBUS ENERGY BILL
DOCKET NO. E002/M-13-642

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Request for Clarification, in response to the Minnesota Public Utilities Commission's January 27, 2014 Order.

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 Amber Hedlund at amber.r.hedlund@xcelenergy.com or (612) 337-2268 if you have any questions regarding this filing.

Sincerely,

/s/

CHRISTOPHER B. CLARK
REGIONAL VICE PRESIDENT
RATES AND REGULATORY AFFAIRS

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF NORTHERN STATES
POWER COMPANY'S PETITION FOR APPROVAL
OF TARIFF MODIFICATIONS IMPLEMENTING
NET METERED FACILITY PROVISIONS,
STANDBY SERVICE EXEMPTIONS, AND METER
AGGREGATION PURSUANT TO THE 2013
OMNIBUS ENERGY BILL

DOCKET NO. E002/M-13-642

REQUEST FOR CLARIFICATION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, respectfully submits this request for clarification of the Minnesota Public Utilities Commission's January 27, 2014 ORDER APPROVING TARIFF AMENDMENTS GOVERNING STANDBY SERVICE CHARGES FOR NET-METERED AND QUALIFYING FACILITIES in the matter referenced above.¹ Specifically, we request clarification of one portion of Order Point 4 that addresses our proposed tariff language related to production meters for net-metered facilities.

We appreciate that other utilities and stakeholders are active participants in this proceeding, and that many of the issues in this docket overlap with other proceedings currently pending before the Commission. Our request for clarification is procedural in nature and limited to a portion of one order point that addresses Xcel Energy's proposed net-metering tariff. We provide the reasons and support for our request below.

¹ This request for clarification is filed pursuant to Minn. Stat. § 216B.27 and Minn. R. 7829.3000.

REQUEST FOR CLARIFICATION

Order Point 4 of the January 27 Order states:

The Commission hereby approves the portions of Xcel's proposed tariff modifications which change the standby service floor from 60 to 100 kW (Section 5, Sheets 101 and 106; Section 10, Sheet 74). The Commission also approves the proposed tariff language that relates only to the requirement for production meters located throughout Tariff Sheet Nos. 10-163 through 10-168.

While Order Point 4 specifically approves language related to production meters included in our proposed new contract for net-metered facilities (Tariff Sheet Nos. 10-163 through 10-168), the Order does not approve the proposed new contract as a whole. Specifically, the January 27 Order, Section III, Commission Action, at page 3 states:

The Commission will take no action on Xcel's proposed tariff modifications relating to net energy billing services, meter aggregation, distributed generation system limits, RECs, meter charges, and net excess generation payments. The additional changes proposed by Xcel, and the comments filed in response, raise issues that need to be resolved with the input of all interested stakeholders.

The Order further discusses how and in what proceedings Xcel Energy, other utilities, the Department, and other stakeholders will address various outstanding issues that arose in this docket.

Our understanding is that Order Point 4 only provides approval of our proposed production meter provisions such that they may be included in a future proposed contract for net-metered facilities, and no further Commission approval of the production meter provisions would be necessary at that time. That is, we would not make a tariff compliance to implement the production meter provisions at this time since our proposed contract for net-metered facilities is not yet approved.

We believe the second sentence of Order Point 4, approving our proposed tariff language related to production meters, could be read to mean our proposed Tariff Sheet Nos. 10-163 through 10-168 would be filed to incorporate the approved production meter language. However, Tariff Sheet Nos. 10-163 through 10-168 were proposed as entirely new tariff sheets in this proceeding and are not approved in the Order, thus we would not be able to make a compliance filing incorporating the production meter provisions. Further, based on discussions at the hearing before the Commission in this matter, we believe there could be a different interpretation of the

Commission's intent on this issue. As such, we believe it would be helpful to clarify Order Point 4.

If the Commission confirms our understanding of the January 27 Order, we believe additional clarifying language provided below would be helpful to resolve any ambiguity related to Order Point 4 and our tariff compliance filing in this docket.

The Commission hereby approves the portions of Xcel's proposed tariff modifications which change the standby service floor from 60 to 100 kW (Section 5, Sheets 101 and 106; Section 10, Sheet 74). The Commission also approves the proposed tariff language that relates only to the requirement for production meters located throughout proposed Tariff Sheet Nos. 10-163 through 10-168, The Commission will take no other action on Xcel Energy's proposed contract for net-metered facilities at this time.

CONCLUSION

We appreciate the opportunity to seek further clarity related to Order Point 4 of the January 27 Order. If the Commission confirms our understanding of the January 27 Order presented in this filing, we would submit a compliance filing to incorporate the standby service tariff provisions approved in Order Point 4 but would not submit tariff sheets that incorporate the production meter language at this time. We appreciate the Commission's consideration of our request for clarification and look forward to working with stakeholders to resolve the remaining issues identified in this proceeding.

Dated: February 18, 2014

Northern States Power Company

CERTIFICATE OF SERVICE

I, Theresa Sarafolean, hereby certify that I have this day served copies of the foregoing document or a summary thereof on the attached lists of persons:

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

xx via electronic filing

DOCKET No. E002/M-13-642

Dated this 18th day of February 2014

/s/

Theresa Sarafolean

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