

STATE OF MINNESOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION

Beverly J. Heydinger	Chair
Betsy Wergin	Vice Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner

MPUC Docket No. E002/M-15-920

In the Matter of Xcel Energy – Petition –  
Light Emitting Diode (LED) Street Lighting  
Rate

**INITIAL COMMENTS OF THE  
SUBURBAN RATE AUTHORITY**

**COMMENTS**

The Suburban Rate Authority (“SRA”) is pleased that Xcel Energy (“Company”) is offering light emitting diode (LED) street lighting. SRA member cities look forward to the benefits of LED technology in public lighting and related advancements in electric energy efficiency.

The SRA has received LED pricing data from the Company for this docket and is aware of the Department’s Comments requesting further pricing information. The SRA notes that LED lighting and other street lighting customer class issues are impacted by the Company’s recently-filed rate case. Therefore, the SRA intends to review pertinent pricing data in the rate case and does not intent to inquire further into LED pricing in this proceeding, absent the addition of new data.

The SRA is also aware of the City of Minneapolis information requests submitted through its comments. Specific operational data sought by the City is important to SRA members in evaluating participation in the Company’s proposed program. For example, the SRA shares the City’s interest in the Kelvin ratings associated with the LED lighting. The SRA is also

interested in the Company's intentions regarding the introduction of LED lighting for decorative streetlights. SRA cities have many Company-owned decorative street lights in their rights-of-way and are interested in their availability.

SRA cities believe that LED lighting has significant benefits in the public lighting context. It awaits the Company's responses to the comments of the Department, the City of Minneapolis and the SRA.

Respectfully submitted,

Dated: December 15, 2015

KENNEDY & GRAVEN, CHARTERED

/s/ James M. Strommen

James M. Strommen (#152614)  
470 US Bank Plaza  
200 South Sixth Street  
Minneapolis, MN 55402  
(612) 337-9300

ATTORNEY FOR THE  
SUBURBAN RATE AUTHORITY