

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF NORTHERN STATES POWER COMPANY FOR AUTHORITY TO INCREASE RATES FOR ELECTRIC SERVICE IN MINNESOTA	DOCKET NO. E-002/GR-13-868
---	----------------------------

THE COMMERCIAL GROUP POSITIONS ON DELIBERATION OUTLINE

Pursuant to Chair Heydinger’s request at Oral Argument, the Commercial Group hereby submits its position on certain salient issues in the Deliberation Outline previously posted in the above-captioned docket.

**I. ALJ Report**

Option 2. Adopt the ALJ’s Report and recommendation with modification ....

**III. Cost of Capital (Vol. III)**

C. Cost of Equity Options

3. Method for Determining Cost of Equity

b) Decisions in Other Jurisdictions

Option (1) Determine that the review of the authorized return on equity in other jurisdictions could be useful when determining the appropriate return no equity...

*See* Briefing Papers, Volume III, pp. 32-35.

8. Cost of Equity

Options c) or f) *See* Briefing Papers, Volume III, p.36.

**VI. Rate Design (Vol. VI)**

A. Class Revenue Apportionment

Option 8. ...require Xcel to rerun the CCOSS .... Set class revenue responsibility to match the cost of service for that class as determined by the Commission-approved CCOSS.

*See* DOC witness Peirce’s testimony (Hearing Transcript Vol. IV, 149:21 – 150:6; Commercial Group Post-Hearing Brief, p.11).

WHEREFORE, the Commercial Group respectfully submits its position list for consideration.

This 19<sup>th</sup> day of March, 2015.

Respectfully submitted,

/S/ Alan R. Jenkins  
Alan R. Jenkins  
Attorney for the Commercial Group

**CERTIFICATE OF SERVICE**

I, Alan R. Jenkins, hereby certify that I have this day served copies of the foregoing document in, MPUC DOCKET NO. E002/GR-13-868 on the attached list of persons.

xx by depositing a true and correct copy thereof, with sufficient postage paid in the United States mail;

xx by email; or

xx by electronic filing.

Dated this 19<sup>th</sup> day of March, 2015.

/S/ Alan R. Jenkins  
Alan R. Jenkins