



414 Nicollet Mall  
Minneapolis, Minnesota 55401

November 16, 2015

—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: COMPLIANCE FILING  
CONTRACT DEMAND ENTITLEMENTS  
DOCKET NO. G002/M-14-654

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits this filing in Compliance with the October 16, 2015 ORDER of the Minnesota Public Utilities Commission.

Order Point 3 states:

*Require Xcel [Energy] to explain why daily interruptible data is not available for use in a design day regression analysis model in a compliance filing within 30 days of the Commission's order in this matter.*

Data availability for use in Design Day analysis is driven by the manner in which billing data is collected and stored. Xcel Energy's data utilized in Design Day regression analysis is sourced from billing information. Currently, Interruptible Customers utilize one of two types of meters, in compliance with Xcel Energy's tariff. Both meters are used during a curtailment event. However, one of the meter types does not associate a time stamp with the throughput information collected. The lack of a time stamp results in an inability to determine what throughput occurred in a specific 24-hour period. As a result, only the monthly totals are stored for billing purposes and available for use in Design Day analysis.

Developing a daily regression model would require a switch to Town Border Station (TBS) data provided by Interstate Pipelines to obtain daily throughput information. However, one TBS will typically support multiple LDC delivery

meters making the location information for the actual gas consumption less specific. In addition, the TBS data is measured as total throughput, not by rate class. Therefore, we would be required to develop a method for removing the interruptible customer usage from the total throughput resulting in greater imprecision in the final quantity.

In contrast, Xcel Energy's current methodology, as described in our annual contract demand filings, does not contain or require interruptible throughput to be estimated and produces regression results that are very robust with most R-squares over 95%. Therefore, revising the methodology to include interruptible throughput is unlikely to yield better predictive results.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list.

Please contact Richard Derryberry at (303) 571-7104 or [richard.derryberry@xcelenergy.com](mailto:richard.derryberry@xcelenergy.com) or me at (612) 330-6613 or [amy.a.liberkowski@xcelenergy.com](mailto:amy.a.liberkowski@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

AMY A. LIBERKOWSKI  
MANAGER, REGULATORY ANALYSIS

Enclosures  
c: Service Lists

## CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies 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

**Docket No. G002/M-14-654**

Dated this 16th day of November 2015

/s/

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SaGonna Thompson  
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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