

August 27, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. G002/M-14-288

Dear Dr. Haar:

The Minnesota Department of Commerce, Division of Energy Resources (Department) provides the following response comments on Xcel Energy's (Xcel or the Company) revised 2014/2015 natural gas Conservation Improvement Program (CIP) Adjustment Factor.

In the Company's reply comments filed July 28, 2014, Xcel revised its proposed CIP Adjustment Factor from \$0.16398 per dekatherm (Dth) to \$0.13818 per Dth. The revised CIP Adjustment Factor calculation includes actual expenditures and recoveries in the CIP tracker account through June 2014. The Department's review of the revised calculation indicates that the revised calculation is consistent with the approach the Company has followed in the past. This approach has been approved for previous CIP Adjustment Factors approved by the Commission.

The Company also calculated a CIP Adjustment Factor that does not include carrying charges. This CIP Adjustment Factor is \$0.14273 per Dth. The Department continues to recommend that the Commission not allow Xcel to apply carrying charges on the CIP Tracker Account. If the Commission determines to not allow carrying charges, then the Department recommends that the Commission approve Xcel's natural gas CIP Adjustment Factor of \$0.14273 per Dth.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ HOLLY LAHD
Rates Analyst

HL/lt

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Response Comments**

Docket No. G002/M-14-288

Dated this 27th day of **August 2014**

/s/Sharon Ferguson

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Gary	Olson		Product Recovery, Inc.	2605 E Cliff Rd Burnsville, MN 55337	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Kim	Pederson	kpederson@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Audrey	Peer	audrey.peer@centerpointenergy.com	CenterPoint Energy	800 Lasalle Avenue - 14th Floor Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Bill	Poppert		Technology North	2433 Highwood Ave St. Paul, MN 55119	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Cindy	Schweitzer Rott	cindy.schweitzer@clearesult.com	CLEARResult's	S12637A Merrilee Rd. Spring Green, WI 53588	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tom	Smilanich		Passive Concepts	228 6th Ave N South St. Paul, MN 55075	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Leo	Steidel	N/A	The Weidt Group	5800 Baker Rd Minnetonka, MN 55345	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
John	Steinhoff		Resource Solutions, Inc.	318 Kensington Drive Madison, WI 53704	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Richard	Szydlowski	rszydlowski@mncee.org	Center for Energy & Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401-1459	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Steve	Tomac	stomac@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Lisa	Wilson	lisa.wilson@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST