



414 Nicollet Mall
Minneapolis, MN 55401

April 28, 2017

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

—Via Electronic Filing—

RE: IN THE MATTER OF THE FORMAL COMPLAINT AND PETITION FOR
RELIEF BY MINNESOTA ENERGY RESOURCES CORPORATION AGAINST
NORTHERN STATES POWER COMPANY D/B/A XCEL ENERGY FOR
VIOLATIONS OF MINN. STAT. § 216B.01 AND COMMISSION POLICY

DOCKET NO. G011, G002/C-17-305

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Notice of Motion and Motion to Expedite in the above-referenced matter, respectfully requesting that reply comments be due on May 9, 2017 at 4:30 p.m.

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 me at (612) 215-5331 or Amanda.Rome@xcelenergy.com with any questions.

Sincerely,

/s/

AMANDA J. ROME
LEAD ASSISTANT GENERAL COUNSEL

Enclosures
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie J. Sieben	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF A FORMAL
COMPLAINT AND PETITION FOR RELIEF
BY MINNESOTA ENERGY RESOURCES
CORPORATION AGAINST NORTHERN
STATES POWER COMPANY D/B/A XCEL
ENERGY FOR VIOLATIONS OF MINN.
STAT. § 216B.01 AND COMMISSION
POLICY

DOCKET NO. G011, G002/C-17-305

**NOTICE OF MOTION AND
MOTION TO EXPEDITE**

To: Minnesota Energy Resources Corporation (MERC) and all other interested parties as identified on the attached Service List

PLEASE TAKE NOTICE that Northern States Power Company d/b/a Xcel Energy moves the Minnesota Public Utilities Commission to expedite its Notice of Comment Period, issued April 21, 2017, in the above referenced docket, so that reply comments will be due on **May 9, 2017 at 4:30 p.m.**

Concurrent with this Motion—and four days before the deadline contemplated in the April 21 Notice—Xcel Energy filed its Response to MERC’s Complaint. As described in more detail in that response, the Company believes the MERC complaint is meritless and designed to force an investigation that will frustrate the Minnesota Vikings’ construction schedule along with their ability to choose a preferred natural gas service provider. Commission precedent does not support utilizing the complaint process to subvert customer choice and side-step a full and fair competitive process. Moreover, with respect to the two policy issues raised by MERC—safety and economic concerns—the Commission has properly concluded that the former is the charge of the Minnesota Office of Pipeline Safety and the latter falls within the purview of rate case proceedings.

The Commission, in its April 21, 2017 Notice of Comment, contemplated an initial comment period that ended on May 4 and a reply comment period that ended on

May 15. Given the customer's need for an expeditious resolution, the Company filed its response on Friday, April 28, four business days before the deadline contemplated in the Notice of Comment Period.

Given that time is of the essence, and because the Company believes that MERC's complaint can be dismissed without further investigation, the Company makes this motion for expedited treatment and respectfully requests the Commission revise its Notice such that the reply comment period will close on Tuesday, May 9—rather than on Monday, May 15.

We note that this change does not shorten the window for those parties seeking to file reply comments and thus does not prejudice them in any way. We are simply requesting that the seven-day time clock for replies start to run on Friday, April 28—the actual date of our response—rather than from the Commission's original date of Thursday, May 4 as reflected in the initial Notice of Comment.

By closing the reply comment period on Tuesday, May 9, the Commission retains the option to schedule this matter for hearing during the Commission's regular agenda meeting on May 11, May 18 or—at the latest—May 25. At that hearing, the Commission would conduct its initial consideration of the complaint, as contemplated by Minn. R. 7829.1800, and answer the following questions:

- Does the Commission have jurisdiction over the complaint?¹
- Are there reasonable grounds to open an investigation?

If the answer to either question is “no”—the Commission *must* dismiss the complaint without further investigation.

The Company does not believe this expedited timeline will prejudice MERC or other interested persons; nor will it cause irreparable harm to the proceeding. The Company thanks the Commission for its consideration of our Motion.

Dated: April 28, 2017

Northern States Power Company

¹ This is an undisputed issue as both parties agree that the Commission does have jurisdiction to hear MERC's complaint.

CERTIFICATE OF SERVICE

I, Carl Cronin, 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

or

xx electronic filing

DOCKET No. G011, G002/C-17-305

Dated this 28th day of April 2017

/s/

Carl Cronin

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_17-305_Official
Lester	Bagley	bagleyl@vikings.nfl.net	Minnesota Vikings	N/A	Electronic Service	No	OFF_SL_17-305_Official
Thomas	Burman	N/A	Stinson Leonard Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Paper Service	No	OFF_SL_17-305_Official
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-305_Official
Ian	Dobson	Residential.Utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_17-305_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17-305_Official
Stacy	Kotch	Stacy.Kotch@state.mn.us	MINNESOTA DEPARTMENT OF TRANSPORTATION	395 John Ireland Blvd. St. Paul, MN 55155	Electronic Service	No	OFF_SL_17-305_Official
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-305_Official
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St W Rosemount, MN 55068	Electronic Service	No	OFF_SL_17-305_Official
Russ	Matthys	matthys@cityofeagan.com	City of Eagan	N/A	Electronic Service	No	OFF_SL_17-305_Official
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-305_Official
Matt	Smith	countyadmin@co.dakota.mn.us	Dakota County	Administration Center 1590 Hwy 55 Hastings, MN 55033-2372	Electronic Service	No	OFF_SL_17-305_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott M.	Wilensky	scott.wilensky@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-305_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_17-305_Official