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January 24, 2013

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

RE: **Comments of the Minnesota Department of Commerce-Division of Energy Resources**
Docket No. E002/AI-13-1108

Dear Dr. Haar:

Attached are the comments of the Minnesota Department of Commerce-Division of Energy Resources (Department) in the following matter:

A request by Northern States Power Company d/b/a Xcel Energy for Commission approval of two affiliated interest agreements with Northern States Power Company-Wisconsin, and a variance to the Commission Rules.

The petition was filed on December 3, 2013. The petitioner is:

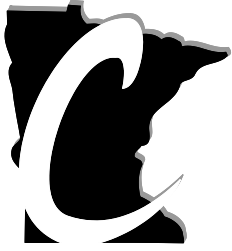
Paul J. Lehman
Manager, Regulatory compliance and Filings
Xcel Energy
414 Nicollet Mall
Minneapolis, Minnesota 55401

The Department recommends **approval** of the petition and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ DALE V. LUSTI
Financial Analyst

DVL/sm
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. E002/AI-13-1108

I. BACKGROUND

On April 26, 2001, in Docket No. E,G002/AI-00-1251, the Minnesota Public Utilities Commission (the Commission) approved an Administrative Services Agreement (ASA) between the Northern States Power Company (Xcel Energy, NSPM or the Company) and Xcel Energy Services Inc. (XES). The Commission has approved subsequent updates to the ASA in Docket No. E, G002/AI-04-181 on August 20, 2004; in Docket No. E,G002/AI-04-666 on October 22, 2004; and in Docket No.E,G002/AI-08-760 on January 29, 2009. The XES Service Agreement provides terms for the provision of certain goods and services between XES and the Company. There is a similar XES Service Agreement between XES and each of the other Xcel Energy operating companies.

On June 22, 2001, in Docket No. E002/AI-01-493, the Commission approved an ASA between the Company and the other Xcel Energy operating companies (the OpCo Service Agreement). The OpCo Service Agreement provides for the exchange of goods and services between the Xcel Energy operating companies.

On January 19, 2010, in Docket No. E002/TL-09-1448, Xcel Energy filed an application with the Minnesota Public Utilities Commission for a route permit for the Hampton – La Crosse 345 kV Transmission Line Project.¹ The application was for the Minnesota portion of the project that consists of approximately 80 miles of new 345 kV transmission line, approximately 15 miles of 161 kV line, a new North Rochester Substation to be located between Pine Island and Zumbrota and related transmission line interconnections. A separate permit application for the Wisconsin portion of the project was to be filed with the Public Service Commission of Wisconsin (PSCW).

¹ The Commission issued a Certificate of Need for this project on May 22, 2009 in Docket No. E002/CN-06-1115.

On May 30, 2012, in Docket No. E002/TL-09-1448, the Commission issued a route permit to the Company to construct the Minnesota portion of the project. According to the Company, on the same day, in Docket No. 5-CE-136, the PSCW approved an application from Northern States Power Company-Wisconsin (NSPW), Dairyland Power Cooperative (Dairyland) and WPPI Energy (WPPI) for a Certificate of Public Convenience and Necessity to construct the Wisconsin portion of the project (Wisconsin Project).² The Wisconsin Project includes the construction of the Briggs Road Substation to be located in North La Crosse, Wisconsin.

The Minnesota and Wisconsin projects together are called the CapX2020 Hampton-Rochester-La Crosse 345 kV Transmission Project (the Hampton-La Crosse Project). Six of the twelve CapX2020 partners are involved in the Hampton-La Crosse Project. The six partners have agreed that the Company, Dairyland, Southern Minnesota Municipal Power Agency (SMMPA), and the City of Rochester (through its Utility Board) will own the Minnesota Project (Minnesota Owners). NSPW, Dairyland, and WPPI will share in the ownership of the Wisconsin Project (Wisconsin Owners).³

II. SUMMARY OF XCEL ENERGY'S REQUEST

On December 3, 2013, the Company submitted a petition seeking approval from the Commission of two affiliated interest agreements with Northern States Power Company-Wisconsin related to the construction and operation of the Wisconsin Project. The two agreements are: the Wisconsin Construction Management Agreement (Wisconsin CMA) and the CapX2020 Operating Utilities Agreement for the La Crosse Project (Briggs Road Substation Agreement). Because the Petition was filed more than 30 days after execution of both the Wisconsin CMA and Briggs Road Substation Agreements,⁴ the Company requests that the Commission vary its rules and allow the late-filed Petition.

The proposed Wisconsin CMA provides that:

- In its capacity as Construction Manager, the Company will provide Construction Management Services to the owners of the Wisconsin Project on an actual-cost basis as described in Article 2 of the Wisconsin CMA, as shown on pages 31 through 47 of 457 of Attachment B to the Petition;⁵

² The Petition at page 4.

³ Ibid, at page 4.

⁴ The Wisconsin CMA is dated December 21, 2012, and the Briggs Road Substation Agreement is dated June 6, 2013.

⁵ The Department's page references refer to the trade secret version of the Petition Attachments. Please see Attachment 1 for an index by subject matter to the Petition Attachments.

- As shown on page 38 of 457 of Attachment B of the Petition, Section 2.4 of the Wisconsin CMA, the Construction Manager is entitled to perform Construction Work, but only pursuant to a separate contract negotiated and approved by a vote of the Management Committee. However, on page 14 of the Petition, the Company states that in its capacity as Construction Manager, the Company will not perform physical construction work on the Wisconsin Project (excluding the Briggs Road Substation);
- The Construction Manager will be compensated for Construction Management Services costs expended by it in the performance of Services or in connection with the Construction Work as described in Article 6 of the Wisconsin CMA, as shown on pages 68 through 77 of 457 and Appendix D-1 of Attachment B to the Petition;
- The Wisconsin CMA is effective at 12:01 a.m. Central Time as of December 21, 2012 per the Preamble to the Wisconsin CMA, as shown on page 7 of 457, on Attachment B to the Petition; and
- Unless earlier terminated pursuant to terms of Section 15.2 to the Wisconsin CMA, the Agreement will remain in full force until Final Completion, per Article 15, as shown on page 105 of 457, on Attachment B to the Petition.

The proposed Briggs Road Substation Agreement provides that:

- The Company will design and/or construct the Substation on an actual-cost basis as described in Schedule A of the Agreement, as shown in Attachment C to the Petition.

The Company states on page 12 of the Petition that the proposed agreements are in the public interest because of the following reasons:

- There are efficiencies gained by NSPM being the Construction Manager;
- The payment provisions are reasonable and will only reimburse the Company for its costs of providing service;
- Project accounting ensures that the Company is not being unduly burdened or unjustly enriched by providing this service; and
- The terms of the Agreements, being amongst more parties than just NSPW and the Company, were negotiated at arm's length.

II. DEPARTMENT ANALYSIS

Statutory Requirements for Affiliated-Interest Agreements

As amended in 1993, the Minnesota "affiliated-interest" statute provides:

No contract or arrangement, including any general or continuing arrangement, providing for the furnishing of management, supervisory, construction, engineering, accounting, legal, financial or similar services, and no contract or arrangement for the purchase, sale, lease or exchange of any property, right, or thing, or for the furnishing of any service, property, right or thing, other than those above enumerated, made or entered into after January 1, 1975 between a public utility and any affiliated interest . . . is valid or effective unless and until the contract or arrangement has received the written approval of the commission.

Minn. Stat. § 216B.48, subd. 3 (Supp. 1993). (Emphasis added.)

This statute provides two tests (the reasonableness and public-interest tests) for the Commission to apply to affiliated-interest contracts:

The commission shall approve the contract or arrangement . . . only if it clearly appears and is established upon investigation that it is reasonable and consistent with the public interest. . . . The burden of proof to establish the reasonableness of the contract or arrangement is on the public utility.

Minn. Stat. § 216B.48, subd. 3 (1992).

As a result, Xcel Energy has the burden of proof to establish the reasonableness of the proposal, and the Commission must approve the proposal only if the Commission finds that the proposal is reasonable and consistent with the public interest.

Filing Requirements

In Docket No. E,G999/CI-98-651,⁶ the Commission provided minimum filing requirements for all affiliated interest filings that are consistent with Minn. Rules 7825.2200B. This docket

⁶ In the Matter of a Commission Investigation into Procedures for Reviewing Public Utility Affiliated Interest Contracts and Arrangements, ORDER INITIATING REPEAL OF RULE, GRANTING GENERIC VARIANCE, AND CLARIFYING INTERNAL OPERATING PROCEDURES (September 14, 1998).

requires that within 30 days of executing a contract or arrangement with an affiliate, the utility must make a filing that includes the following information:

1. A heading that identifies the type of transaction.
2. The identity of the affiliated parties in the first sentence.
3. A general description of the nature and terms of the agreement, including the effective date of the contract or arrangement and the length of the contract or arrangement.
4. A list and the past history of all current contracts or agreements between the utility and the affiliate, the consideration received by the affiliate for such contracts or agreements, and a summary of the relevant cost records related to these ongoing transactions.
5. A descriptive summary of the pertinent facts and reasons why such contract or agreement is in the public interest.
6. The amount of compensation and, if applicable, a brief description of the cost allocation methodology or market information used to determine cost or price.
7. If the service or good acquired from an affiliate is competitively available, an explanation must be included stating whether competitive bidding was used and, if it was used, a copy of the proposal or a summary must be included. If it is not competitively bid, an explanation must be included stating why bidding was not used.
8. If the arrangement is in writing, a copy of that document must be attached.
9. Whether, as a result of the affiliate transaction, the affiliate would have access to customer information, such as customer name, address, usage or demographic information.
10. The filing must be verified.

The Company has substantially provided the above-required information in compliance with the Commission's Order and rules, specifically Minn. Rule 7825.2200B.

Analysis of the Proposed Agreements

In analyzing contracts or agreements between a utility and its affiliates, the Department has two sets of concerns. The first set of concerns relates to the merits of the particular agreements. The second set of concerns relates to the ability of the Department to verify, after the fact, that the

implementation of the agreement did not result in the utility's ratepayers subsidizing the operations of the utility's unregulated affiliates.

In evaluating whether Xcel Energy has shown that the proposed Agreements are consistent with the public interest, the Department considers:

- whether the price is reasonable;
- whether the agreement affects operating costs and rate levels;
- whether the agreement affects the competitive situation; and
- whether the agreement impairs effective regulation.

The Department's review of Articles 2 (Engagement of the Construction Manager) and 6 (Funding) of the proposed Wisconsin CMA and paragraph 2 of the Briggs Road Substation Agreement, supported its understanding that the Company will be fully reimbursed for its services on an actual cost basis. Therefore, the Department considers that the proposed actual cost price is reasonable; and that project accounting ensures that the proposed transaction will not affect the operating costs and rate levels of the Minnesota jurisdictional customers since the Company will be neither unduly burdened nor unjustly enriched by providing the service.

The Department's review of the competitive bidding process pertaining to this docket supports the Company's conclusion that the competitive bidding requirements are not applicable. As Xcel Energy indicated, construction management is typically performed by utility resources when overseeing the construction of the utility's own facilities. Given that the Hampton-La Crosse Project has multiple owners, a single construction manager was chosen from among the owners to ensure coordination and efficiency. The owners' selection of the Company as construction manager of the entire project (both the Minnesota and Wisconsin portions) is logical given that the Company has the largest stake in the project of any of the owners. The Department concludes that competitive bidding for construction management services for the Wisconsin Project would not lead to a more cost-effective result and should therefore not be required.

Effective regulation would not be impaired as a result of the approval of these agreements. Based on information provided by Xcel Energy, ratepayers appear to be adequately protected. Minnesota Statutes 216B.48, subd. 6 gives the Commission continued authority over the Agreement. Any detailed records required by Minnesota Rules part 7825.2300 will be available for inspection at the Company's headquarters.

III. REQUEST FOR RULE VARIANCE

The Company requested Commission approval of a variance to Minnesota Rules 7825.2200(B), which requires the Company to make an affiliated interest filing within 30 days of executing a contract or arrangement with an affiliate. As stated earlier, the Petition was filed more than 30 days after execution of both the Wisconsin CMA and the Briggs Road Substation Agreement.

Minnesota Rules 7829.3200, subd 1 states that the Commission shall grant a variance when the following conditions have been met:

- 1) Enforcement of the rule would impose an excessive burden upon the applicant or other affected by the rule;
- 2) Granting the variance would not adversely affect the public interest; and
- 3) Granting the variance would not conflict with standards imposed by law.

Denial of the Petition at this time would impose an excessive burden on the Company, NSPW, and the other Wisconsin Owners by causing delay and added expense to the Wisconsin Project. Granting the variance would be in the public interest by providing the efficient and cost-effective construction of the Hampton-La Crosse Project. Finally, the Department is unaware of any law that would be in conflict with approval of the requested variance.

The Department recommends approval of the variance request.

IV. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission:

- 1) Approve the Company's proposed Wisconsin CMA and Briggs Road Substation affiliated interest agreements; and
- 2) Grant the Company's request for a variance from Minnesota Rules 7825.2200(B) for the late-filed Petition.

/sm

Docket No. E002/AI-13-1108
Subject Matter Index to Petition Attachments

Docket No. E002/AI-13-1108
DOC Attachment 1

A - Required Filing Information

B - Wisconsin Construction Management Agreement, dated as of December 12, 2012 –
Pages 1 thru 116 of 457

- Schedule 1 to Wisconsin Project Participation Agreement, Wisconsin Construction Management Agreement and Wisconsin Operation and Maintenance Agreement – GENERALLY APPLICABLE PROVISIONS - Pages 117 thru 134 of 457
- Appendix A to Construction Management Agreement – WISCONSIN PROJECT PLAN – Pages 135 thru 194 of 457
- Appendix B to Construction Management Agreement – DESIGN – Pages 195 thru 274 of 457
- Appendix C-1 to Construction Management Agreement – CAPX 2020 SUBSTATION DESIGN CRITERIA – Pages 275 thru 339 of 457
- Appendix C-2 to Construction Management Agreement – CAPX2020 TRANSMISSION LINE DESIGN CRITERIA – Pages 340 thru 384 of 457
- Appendix D-1 – NSP,MN Reimbursement of Cost for Services – Pages 385 thru 389 of 457
- Appendix D-2 to Wisconsin Construction Management Agreement, Dairyland Power Cooperative Schedule D – Cost for Services – Pages 390 thru 391 of 457
- Appendix E – Pre-Effective Time Management Committee Approved CM Costs – Page 392 of 457
- Appendix F-1 to Construction Management Agreement – Form of Lien Waiver – Pages 393 thru 402 of 457
- Appendix F-2 to Construction Management Agreement – Form of Application for Deposit – Pages 403 thru 404 of 457
- Appendix F-3 to Construction Management Agreement – Form of Project Change Request – Pages 405 thru 406 of 457
- Appendix F-4 to Construction Management Agreement – Form of Progress Report – Pages 407 thru 416 of 457
- Appendix F-5 to Construction Management Agreement – Form of Financial Summary Report – Pages 417 thru 419 of 457
- Appendix G to Construction management Agreement – Project Manager – Page 420 of 457
- Appendix H to Construction Management Agreement – Additional Required Provisions – Pages 421 thru 426 of 457
- Appendix I to Wisconsin Construction Management Agreement – Insurance – Pages 427 thru 436 of 457
- Appendix J-1 to Wisconsin Construction Management Agreement – Existing Distribution DL Owners – Page 437 of 457

- Appendix J-2 to Wisconsin Construction Management Agreement – Existing Transmission Lines and Existing TL Owners – Page 438 of 457
- Appendix J-3 to Wisconsin Construction Management Agreement – Underbuild Owner Lines and Underbuild Project Owners – Page 439 of 457
- Appendix J-4 to Wisconsin Construction Management Agreement – Underbuild TP Lines and Underbuild TP Owners – Page 440 of 457
- Exhibit J-5 to Wisconsin Construction Management Agreement – Relocated Project Owner TLs and Relocated Project TL Owners – Page 441 of 457
- Appendix J-6 to Wisconsin Construction Management Agreement – Relocated TP TLs and Relocated TP TL Owners – Page 442 of 457
- Appendix J-7 to Wisconsin Construction Management Agreement – Relocated Project Owner DLs and Relocated Project DL Owners – Page 443 of 457
- Appendix J-8 to Wisconsin Construction management Agreement – Relocated TP DLs and Relocated TP DL Owners – Page 444 of 457
- Exhibit J-9 to Wisconsin Construction Management Agreement – Remote Credited Owner USIs and Remote Credited USI Owners – Page 445 of 457
- Appendix J-10 to Wisconsin Construction Management Agreement – Remote TP USIs and Remote TP USI Owners – Page 446 of 457
- Appendix J-11 to Wisconsin Construction Management Agreement – Co-located Owner Lines and Co-located Line Owners – Page 447 of 457
- Appendix J-12 to Wisconsin Construction Management Agreement – Non-Credited USIs and Non-Credited USI Owners – Page 448 of 457
- Exhibit G-1 to Wisconsin Project Participation Agreement and Appendix K-1 to Wisconsin Construction Management Agreement – Form of Administrative Agent Agreement (Easements) – Pages 449 thru 453 of 457
- Exhibit G-2 to Wisconsin Project Participation Agreement and Appendix K-2 to Wisconsin Construction Management Agreement – Form of Administrative Agent Agreement (General Contracting Powers) – Pages 454 thru 455 of 457
- Appendix L – Sales and Use tax Obligations – Pages 456 thru 457 of 457

C - CAPX 2020 Operating Utilities Agreement for La Crosse Project – Briggs Road (Wisconsin) Substation

D - O&M Split – Page 1 of 1

E - Cash Flow and Shared Transactions– Pages 1 thru 4 of 4

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
Comments**

Docket No. E002/AI-13-1108

Dated this 24th day of **January 2014**

/s/Sharon Ferguson

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