



414 Nicollet Mall  
Minneapolis, MN 55401

April 10, 2019

—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: LETTER  
LIGHTING TARIFF REVISIONS TO INCLUDE LED OPTIONS  
DOCKET NO. E002/M-18-729

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits this letter in response to the March 14, 2019 Response Comments of the Minnesota Department of Commerce, Division of Energy Resources in the above-referenced docket. We appreciate the Department's review of our Reply Comments.

In Response Comments, the Department recommended that the Commission approve the Company's proposed Automatic Protective Lighting (A07) additions using a pre-tax rate of return of 7.00 percent and an avoided relamp maintenance value of \$4.57 per light. We do not object to the recommendation to use an avoided relamp maintenance value of \$4.57 per light; however, we continue to support use of a 7.08 percent pre-tax rate of return as reflected in our initial Petition in this docket.

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 Rebecca Eilers at [rebecca.d.eilers@xcelenergy.com](mailto:rebecca.d.eilers@xcelenergy.com) or 612-330-5570, or me at [lisa.r.peterson@xcelenergy.com](mailto:lisa.r.peterson@xcelenergy.com) or 612-330-7681 if you have any questions regarding this filing.

Sincerely,

/s/

LISA R. PETERSON  
MANAGER, REGULATORY ANALYSIS

Enclosures  
c: Service List

## CERTIFICATE OF SERVICE

I, Lynnette Sweet, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota

electronic filing

**DOCKET No. E002/M-18-729**

Dated this 10th day of April 2019

/s/

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Lynnette Sweet  
Regulatory Administrator

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