



414 Nicollet Mall
Minneapolis, MN 55401

December 10, 2014

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

—Via Electronic Filing—

RE: GAS UTILITY INFRASTRUCTURE COST RIDER
DOCKET NO. G002/M-14-336

Dear Dr. Haar:

Xcel Energy respectfully requests that the Commission deny the Office of the Attorney General's December 9, 2014 request to reschedule the hearing in the matter of the Company's Petition for approval of a Gas Utility Infrastructure Cost (GUIC) Rider (Docket No. G002/M-14-336).

In accordance with the requirements provided in Minn. Stat. § 216B.1635, the Company made its initial GUIC filing on April 24, 2014. In that pre-filing, the Company provided sufficient details regarding the costs it would be seeking in its Rider Petition. On August 1, 2014, the Company then filed its Petition to the Minnesota Public Utilities Commission (Commission) requesting approval of recovery of gas utility infrastructure costs through a GUIC Rider pursuant to Minn. Stat. § 216B.1635. Specifically, we seek Commission approval of:

1. An ongoing GUIC Rider;
2. 2015 GUIC revenue requirements of \$14.94 million for the projected transmission and distribution natural gas infrastructure investments and associated O&M costs, which includes costs for which the Commission previously granted deferred accounting;
3. 2015 GUIC rate factors by class to be included in the Resource Adjustment on bills for gas customers in Minnesota beginning January 1, 2015; and
4. Proposed GUIC tariff sheets and customer notice.

The Department of Commerce conducted its thorough investigation and analysis, which resulted in the DOC's October 16 Comments recommending approval of the Company's Petition. The Company filed brief Reply Comments on October 23.

The OAG then filed Comments on October 27. Both the Company and the DOC filed Comments in response to the OAG's Comments, on November 14 and November 7, respectively. It was only after that point that the OAG served the Company with discovery in this matter. The OAG received the Company's pre-filing in April and our Petition in August, which equates to sufficient time for the OAG to conduct discovery. Now that the matter has been noticed for a Commission meeting, the OAG is seeking to extend the schedule. The Company has complied with all statutory provisions and has been available to respond to discovery. The issues raised in the OAG's request for delay have been addressed in the record.

The Company filed our Rider request in an effort to ease administrative burden by allowing the Company an opportunity to avoid a general rate case. Additionally, the timing of our filing was such that the proposed rates could go in effect at the start of 2015. Should the Commission grant the OAG's requested delay and then approve our request, the result would be the Company recovering our approved costs in 2015 over a shorter time period, which could increase the bill impact on our customers. Further delay is not warranted. The Company respectfully requests that the Commission deny the OAG's request for an additional 60 days to conduct its investigation.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. Please contact me at (612) 215-4662 or Alison.C.Archer@xcelenergy.com if you have any questions regarding this matter.

SINCERELY,

/s/

ALISON C. ARCHER
ASSISTANT GENERAL COUNSEL

c: Service List

CERTIFICATE OF SERVICE

I, Tiffany R. Hughes, hereby certify that I have this day served copies or summaries of the foregoing document on the attached list(s) 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-14-336

Dated this 10th day of December 2014

/s/

Tiffany R. Hughes
Records Analyst

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