



414 Nicollet Mall
Minneapolis, MN 55401

April 23, 2015

—Via Electronic Filing—

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

RE: REPLY COMMENTS
ELECTRIC VEHICLE CHARGING TARIFF
DOCKET NO. E002/M-15-111

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the attached Reply Comments in response to the Minnesota Public Utilities Commission's Notice of Comment Period dated February 10, 2015.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and served copies of these Reply Comments on the parties on the attached service list. If you have any questions regarding this filing please contact me at (612) 330-5953 or cynthia.d.harrington@xcelenergy.com.

Sincerely,

/s/

CYNTHIA D. HARRINGTON
REGULATORY CASE SPECIALIST

Enclosure
cc: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY FOR
APPROVAL OF A RESIDENTIAL ELECTRIC
VEHICLE CHARGING TARIFF

DOCKET NO. E002/M-15-111

REPLY COMMENTS

OVERVIEW

Northern States Power Company, doing business as Xcel Energy, submits this Reply to the Comments submitted by the Minnesota Department of Commerce, Division of Energy Resources (Department) and the Environmental Intervenors on our January 30, 2015 Petition for Approval of a Residential Electric Vehicle (EV) Charging Tariff.

We appreciate the Department's review of our filing and the opportunity to provide additional information in this Reply. Below we provide our responses and confirm our agreement with two future filing requirements recommended by the Department.

REPLY

We appreciate the Department's recommendation of approval for our EV Service Tariff and establishment of a tracker account for the costs associated with the tariff.

We agree with the Department's conclusion that uniformity in the on- and off-peak periods is not necessary. As we noted in our initial comments, we believe it is appropriate and economically efficient to recognize the differences between the hourly resource costs of various utilities, and therefore not require all utilities to share the same on- and off-peak hours for their EV tariff.

As per the statute requirement, we included in our filing an option to purchase electricity entirely from renewable energy. In addition, we are proposing a promotion for new EV rate subscribers to remove the barrier for customers to adopt the renewable energy option with this rate. Given the voluntary nature of this tariff and

the Voluntary Renewable and High-Efficiency Energy Purchase Rider (Windsorce program), it seems most appropriate and consistent to offer the renewable energy option on an opt-in basis. We concur with the Department's conclusion that use of our existing green pricing rate for the renewable option is preferred as it offers administrative simplicity and consistency.

The Company committed in our initial filing to provide an annual compliance report on the status of this rate filing. We would agree to the Department's recommendation to include the amount of electricity sold under the tariff for on-peak and off-peak periods, and a brief description of all development and promotional activities and their costs. We respectfully request that filing be due at the end of the first quarter of the year proceeding the Commission's Order on the status of this rate offering, in order to allow sufficient time for collection of the required reporting data.

CONCLUSION

We appreciate the opportunity to provide additional information in these Reply Comments. We continue to request that the Commission approve our Electric Vehicle Charging Tariff, as proposed in our January 30, 2015 filing.

Dated: April 23, 2015

Northern States Power Company

CERTIFICATE OF SERVICE

I, Tiffany Hughes, 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 by electronic filing.

MPUC Docket No: E002/M-15-111

Dated this 23rd day of April 2015.

/s/

Tiffany Hughes

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