



414 Nicollet Mall
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September 30, 2015

—Via Electronic Filing—

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

Re: RESPONSE TO PETITION FOR RECONSIDERATION
XCEL ENERGY ELECTRIC RATE CASE
DOCKET NO. E002/GR-13-868

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, respectfully submits the enclosed Response to the Petition for Reconsideration of the Office of the Attorney General – Residential Utilities and Antitrust Division filed September 21, 2015 in the above-referenced docket.

We have electronically filed this document, and notice of the filing has been served on the parties on the attached service list. If you have any questions regarding this submission, please contact me at (612) 215-4663 or Aakash.Chandarana@xcelenergy.com.

Sincerely,

/s/

AAKASH H. CHANDARANA
REGIONAL VICE PRESIDENT
RATES AND REGULATORY AFFAIRS

Enclosures
c: 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 Wergen	Commissioner

IN THE MATTER OF THE APPLICATION OF
NORTHERN STATES POWER COMPANY
FOR AUTHORITY TO INCREASE RATES
FOR ELECTRIC SERVICE IN THE STATE
OF MINNESOTA

Docket No. E002/GR-13-868

RESPONSE TO PETITION FOR
RECONSIDERATION OF THE OFFICE OF
THE ATTORNEY GENERAL

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, respectfully submits this Response to the Office of the Attorney General – Residential Utilities and Antitrust Division September 21, 2015 Petition for Reconsideration of the Commission’s August 31, 2015 Order Reopening, Clarifying, and Supplementing May 8, 2015 Order in this Docket.¹ The OAG’s Petition for Reconsideration presents no new basis for the Commission to reconsider its August Order. Accordingly, we respectfully request that the Commission deny the OAG’s Petition.

DISCUSSION

Minnesota Statutes set forth the standard for the Commission’s review of Petitions for Reconsideration: “If in the commission’s judgment, after rehearing, it shall appear that the original decision, order, or determination is in any respect unlawful or unreasonable, the commission may reverse, change, modify, or suspend the original action accordingly.”² The OAG offers no new information about the lawfulness or

¹ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E002/GR-13-868, ORDER REOPENING, CLARIFYING, AND SUPPLEMENTING MAY 8, 2015 ORDER (August 31, 2015) (August Order).

² Minn. Stat. § 216B.27, subd. 3.

reasonableness that the Commission has not already heard. Rather, the OAG repeats prior arguments³ that the Commission has already considered and rejected.⁴

Further, the Commission has denied reconsideration in the past when “[b]ased on [its] review ...the petitions do not raise new issues, do not point to new and relevant evidence, do not expose errors or ambiguities in the order, *and do not otherwise persuade the Commission that it should rethink the decisions set forth in that order.*”⁵ In other words, in cases where rehearing has recently been denied, the Commission had considered all argument, arrived at a reasoned decision, and therefore had no reason to rehash the prior deliberation process. Under this standard, the OAG has not raised any new arguments that would merit reconsideration. Thus, its Petition should be denied. As the Commission considers the OAG’s petition, the Company also notes that its interim rate proposal is the only proposal on the record whose full compliance with the Interim Rate Statute⁶ has not been challenged by any party.

The OAG’s Petition creates further delays in this already protracted proceeding. And, by making its filing, the OAG has lengthened the surcharge period that is currently underway prior to implementation of final rates. Therefore, in the interest of bringing this case to a close as quickly as possible, the Company respectfully requests that the Commission schedule its hearing of the OAG’s Petition for the same time it schedules its hearing of our September 2, 2015 Compliance Filing or as close to it as possible so the Company can implement final rates by November 1.

CONCLUSION

For the reasons stated above, the Company respectfully requests that the Commission deny the OAG’s Petition for Reconsideration.

Respectfully submitted,

Northern States Power Company

September 30, 2015

³ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E002/GR-13-868, Reply Comments of the Office of the Attorney General – Residential Utilities and Antitrust Division at 4-8 (January 23, 2015).

⁴ August Order at 11.

⁵ *In the Matter of the Petition of Northern States Power Company, d/b/a Xcel Energy, for Approval of a Gas Utility Infrastructure Cost Rider*, Docket No. G002/M-14-336, ORDER DENYING RECONSIDERATION (Apr. 10, 2015); *In the Matter of the Petition of Minnesota Energy Resources Corporation for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G011/GR-13-617, ORDER DENYING RECONSIDERATION at 1 (Dec. 22, 2014) (emphasis added).

⁶ Minn. Stat. § 216B.16, subd. 3.

CERTIFICATE OF SERVICE

I, Jim Erickson, 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

xx electronic filing

Docket No. E002/GR-13-868

Dated this 30th day of September 2015

/s/

Jim Erickson

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