



414 Nicollet Mall
Minneapolis, Minnesota 55401

June 19, 2014

—VIA ELECTRONIC FILING—

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

RE: REPLY COMMENTS
ANNUAL REPORT ON NATURAL GAS SERVICE QUALITY FOR 2013
DOCKET NO. G002/M-14-367

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this brief Reply to the June 6, 2014 Comments of the Minnesota Department of Commerce – Division of Energy Resources on our Annual Report on Natural Gas Service Quality for 2013.

We appreciate the Department's recommendation that the Commission accept our Report, pending additional information. The Department requested further explanation as to the variances in monthly meter reading percentages.

We note that the monthly variances in meter reading data do not indicate a variable quality of service. Instead, the variances are a result of a 21-day read cycle for each billing month where all 21 days do not always coincide exactly with a calendar month. For example, there were only 19 working days in February, and the meter readings from those 19 days are shown as occurring in the calendar month of February in Attachment B of our Petition. Additional readings for the February billing month were done on the last working days of January and the first working days of March to comprise the 21-day read cycle. When we remove multiple meter reads for a given meter from our calendar month report data, however, some of the reads for the February billing month are excluded from the January calendar month reads, and then are not included in February's calendar month either. Excluding multiple meter reads from the calendar month makes February's meters read percentage artificially low.

Dr. Haar
June 19, 2014
Page 2 of 2

The number of working days in a month, the number of weekends in a month, and the number of holidays in a month will thus impact the meters read percentage when excluding multiple meter reads from the data.

We hope this Reply has clarified the Department's questions about our meter reading data as reported in our Petition. Please contact Rebecca Eilers at rebecca.d.eilers@xcelenergy.com or 612-330-5570 or me at paul.lehman@xcelenergy.com or 612-330-7529 if you have any questions regarding this filing.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and copies have been served on the parties on the attached service list.

SINCERELY,

/s/

PAUL J. LEHMAN
MANAGER, COMPLIANCE AND FILINGS

c: Service List

CERTIFICATE OF SERVICE

I, Theresa Sarafolean, 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. G002/M-14-367

Dated this 19th day of June 2014

/s/

Theresa Sarafolean

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|---|------------------------------------|--|--------------------|-------------------|------------------------|
| Julia | Anderson | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134 | Electronic Service | Yes | OFF_SL_14-367_M-14-367 |
| Jeffrey A. | Daugherty | jeffrey.daugherty@centerpointenergy.com | CenterPoint Energy | 800 LaSalle Ave Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_14-367_M-14-367 |
| Ian | Dobson | ian.dobson@ag.state.mn.us | Office of the Attorney General-RUD | Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101 | Electronic Service | No | OFF_SL_14-367_M-14-367 |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 500 Saint Paul, MN 551012198 | Electronic Service | No | OFF_SL_14-367_M-14-367 |
| Todd J. | Guerrero | todd.guerrero@kutakrock.com | Kutak Rock LLP | Suite 1750 220 South Sixth Street Minneapolis, MN 554021425 | Electronic Service | No | OFF_SL_14-367_M-14-367 |
| Burl W. | Haar | burl.haar@state.mn.us | Public Utilities Commission | Suite 350 121 7th Place East St. Paul, MN 551012147 | Electronic Service | Yes | OFF_SL_14-367_M-14-367 |
| Sandra | Hofstetter | N/A | MN Chamber of Commerce | 7261 County Road H Fremont, WI 54940-9317 | Paper Service | No | OFF_SL_14-367_M-14-367 |
| Michael | Hoppe | il23@mtn.org | Local Union 23, I.B.E.W. | 932 Payne Avenue St. Paul, MN 55130 | Electronic Service | No | OFF_SL_14-367_M-14-367 |
| Richard | Johnson | Rick.Johnson@lawmoss.com | Moss & Barnett | 90 South 7th Street Suite #4800 Minneapolis, MN 554024129 | Electronic Service | No | OFF_SL_14-367_M-14-367 |
| Michael | Krikava | mkrikava@briggs.com | Briggs And Morgan, P.A. | 2200 IDS Center 80 S 8th St Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_14-367_M-14-367 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-----------------------------------|------------------------------------|--|--------------------|-------------------|------------------------|
| John | Lindell | agorud.ecf@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130 | Electronic Service | Yes | OFF_SL_14-367_M-14-367 |
| Andrew | Moratzka | apmoratzka@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_14-367_M-14-367 |
| David W. | Niles | david.niles@avantenergy.com | Minnesota Municipal Power Agency | Suite 300 200 South Sixth Street Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_14-367_M-14-367 |
| SaGonna | Thompson | Regulatory.Records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | No | OFF_SL_14-367_M-14-367 |