

**STATE OF SOUTH DAKOTA  
BEFORE THE  
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY  
FOR APPROVAL OF 2013 TRANSMISSION  
COST RECOVERY ELIGIBILITY AND RATE  
RIDER ADJUSTMENT

DOCKET NO. EL13-\_\_\_\_

**PETITION  
FOR TRANSMISSION  
COST RECOVERY**

**OVERVIEW**

Northern States Power Company, doing business as Xcel Energy, submits to the South Dakota Public Utilities Commission this Petition for approval of a 2013 Transmission Cost Recovery Rider, Adjustment Factor, and Tracker Account report. We submit this Petition pursuant to S. D. Codified Laws Chapter 49-34A Sections 25.1 through 25.4, which authorizes the Commission to approve a tariff mechanism for the automatic annual adjustment of charges for a public utility to recover the South Dakota jurisdictional portion of eligible investments and expenses related to new or modified transmission facilities. Electric transmission facilities covered by the above-referenced statutes include associated facilities such as substations and transformers.

The Company was initially authorized to establish the TCR Rider by the Commission's January 13, 2009 Order in Docket No. EL07-007. In this filing we propose to revise the TCR Rider to reflect current projects and expenditures.

This Petition seeks Commission approval of:

- eligibility of 2013 transmission projects for TCR Rider recovery;
- TCR revenue requirements and rate adjustment factor for 2013;
- the TCR tracker report for approved transmission project investments; and
- proposed revised TCR Rider tariff sheets.

The current TCR adjustment factor was effective September 1, 2012 in compliance with the Settlement Stipulation and Commission Order in our last TCR rider filing in Docket No. EL12-035. The current TCR adjustment factor was set to recover the then outstanding TCR Tracker account balance, including carrying charges, over the remaining four months of 2012.

We have prepared this Petition in accord with the Settlement Stipulation and Commission Order in our last TCR rider filing and have followed the approved cost recovery methodology.

For 2013, we propose to begin recovery of the South Dakota jurisdictional portion of the revenue requirements related to twenty-two transmission projects located throughout our service territory. We propose to recover \$2.45 million associated with these projects for the 2013 calendar year (see Attachment 5). Included in the \$2.45 million figure is the 2012 unrecovered balance of \$227,462. The 2013 revenue requirement calculations take into account the forecasted revenue collection based on the higher factor in place for the first three months of 2013.

The total of the transmission investment costs and the tracker balance results in an average bill impact of a \$0.46 per month for a typical residential electric customer using 750 kWh per month. This is a decrease of \$1.82 per month from the current TCR Rider recovery. We propose to implement a rate of \$0.000612 per kWh applied to all energy billed to each customer class beginning April 1, 2013 through December 2013. This represents a decrease of \$0.002426 from the existing rate of \$0.003038 per kWh.

### **REQUIRED INFORMATION**

Following is information specified in S.D. Codified Laws Chapter 49-34A Sections 25.1 through 25.4 and S. D. Admin. R. 20:10:13:26 regarding the proposed TCR rate rider tariff and adjustment factor:

**(1) Name and Address of the Public Utility**

Northern States Power Company,  
doing business as Xcel Energy  
500 West Russell Street  
Sioux Falls, South Dakota 57104  
(605) 339-8350

**(2) Section and Sheet Number of Tariff Schedule**

Xcel Energy proposes to revise its Transmission Cost Recovery Rider tariff sheet number 71 in Section 5 of the Northern States Power Company South Dakota Electric Rate Book. Attachment 15 depicts the proposed tariff sheet that would implement the revised Transmission Cost Recovery Rider Adjustment Factor.

### **(3) Description of the Tariff Change**

This request revises the TCR Adjustment Factor that became effective on September 1, 2012. This adjustment factor is shown as a separate line item on customer bills.

### **(4) Reason for the Requested Change**

Xcel Energy first petitioned the Commission for Transmission Cost Recovery in February 2007. Since that time, the Company has made significant investments in new transmission facilities in order to maintain system reliability, meet customer demand, and to transmit wind energy from South Dakota, North Dakota, and western Minnesota. To ensure that customers are not under or overcharged, we record the actual revenues and costs in our tracker account and return or collect any differences during the next recovery period based on the estimated end of year balance in the tracker account.

This petition includes costs for 2013 and the true-up amount from previous years. None of these costs are included in base rates, nor are they proposed to be recovered in the currently pending electric rate case (Docket No. EL12-046).

### **(5) Present Rate**

The current rate for all customer classes is \$0.003038 per kWh. The rate is calculated by dividing the forecasted balance of the TCR Tracker Account by the forecasted retail sales for the calendar year; it is rounded to the nearest \$0.000001 per kWh.

### **(6) Proposed Rate**

#### **A. Proposed Tariff**

##### ***i.* Authority**

The following statutes establish Commission authority for considering and approving the revised rate rider proposed in this Petition. The Company proposes a 2013 rate factor for all customer classes of \$0.000612 per kWh.

*S. D. Codified Laws 49-34A-25.1 - Notwithstanding any other provision of this chapter, the commission may approve a tariff mechanism for the automatic annual adjustment of charges for the jurisdictional costs of new transmission facilities with a design capacity of thirty-four and one-half kilovolts or more and which are more than five miles in length. For the purposes of §§49-34A-25.1 to 49-34A-25.4, inclusive,*

*electric transmission facilities and electric transmission lines covered by this section include associated facilities such as substations and transformers.*

*S. D. Codified Laws 49-34A-25.2 - Upon filing of an application consistent with rules promulgated by the commission by any public utility providing transmission service, the commission may approve, reject, or modify, after notice, hearing, and comment, a tariff that:*

*(1) Allows the public utility to recover on a timely basis the costs net of revenues of facilities described in § 49-34A-25.1.*

The Company proposes to recover through the TCR Rider the jurisdictional annual revenue requirements associated with transmission projects that are determined by the Commission to be eligible for recovery under S. D. Codified Laws 49-34A-25.1.

We have calculated our revenue requirement consistent with the approved Settlement Stipulation in our last approved TCR Rate Rider filing, Docket No. EL12-035. The capital structure approved in that docket was addressed on page 5, Section 5, where it was stated that the parties agreed:

*... that the overall rates of return applicable to the eligible investments included in the TCR rider shall be 8.18% in 2008, 8.12% in 2009, 8.12% in 2010, 7.68% in 2011, and 7.79% in 2012. The overall returns are based on an agreed upon ROE for 2008-2010, and a separate agreed upon ROE for 2011-2012. Overall rates of return are based on the Company's actual capital structure and long-term debt costs at the end of the preceding calendar year.*

Because year end 2012 information is not yet available, the 2013 and 2014 overall return is consistent with the 2011 year end actual capital structure, cost of debt and an ROE consistent with the 2012 ROE approved by the Commission Docket EL12-035. See the base assumptions in Attachment 10 for details on the ROE and capital structure used for calculations in this petition.

## ***ii.* Implementation**

Attachment 15 provides the proposed revised tariff sheets to implement the proposed TCR rate adjustment. The rate factor is based on forecast costs for the 2013 calendar year. As required by the Commission, for each 12-month period ending December 31, a true-up adjustment to the Tracker Account will be calculated reflecting the difference between the TCR Adjustment recoveries from customers and the actual revenue requirements for the period.

## **B. Eligible Transmission Projects**

### *i.* **Summary**

The following fourteen projects were approved for recovery by the Commission in our last Transmission Cost Recovery Rider in Docket No. EL12-035, and we continue to seek recovery of these projects in 2013:

- CapX2020 Brookings – Twins Cities
- CapX2020 Bemidji
- CapX2020 Fargo – Twin Cities
- CapX2020 La Crosse-Local
- CapX2020 La Crosse-MISO
- CapX2020 La Crosse-WI
- Pleasant Valley – Byron
- Glencoe – Waconia
- Sioux Falls Northern
- Grove Lake – Glenwood
- Sauk Center – Osakis
- Hollydale
- Meadow Lake
- Chisago – Apple River

When approved in our previous TCR Petition, the La Crosse project was divided into two parts, La Crosse 1 and La Crosse 2 to reflect the different cost sharing treatment each of these portions of the La Crosse project receive under the MISO tariff. The 2013 Petition further divides the La Crosse project into three parts, La Crosse - Local, La Crosse - MISO, and La Crosse - WI. These second two segments equate to the previous cost grouping we referred to La Crosse 2, and both of these newly named segments are treated under the MISO tariff as regionally cost shared transmission projects. Thus both the 2012 and the 2013 filings capture data on the entire La Crosse project. For the 2013 filing the data was just regrouped and more descriptive names were assigned to make it clearer that the correct input assumptions are being used for each portion of this large project and to ensure that the correct information is included.

The Company continues to make significant new investments to its transmission system. This Petition seeks approval of the costs associated with the following eight

additional projects we believe meet the eligibility criteria established in S. D. Codified Laws 49-34A-25.1:

1. Bluff Creek – Westgate
2. Chaska – Hwy 212 Conversion
3. Minn Valley
4. Maple River – Red River
5. Big Stone – Brookings 345 kV transmission line
6. Lake Marion - Burnsville
7. Maple Lake – Annandale
8. Wilmarth – Carver County

In previous TCR Rider filings, the Lake Marion - Burnsville project was included as part of the CapX2020 Brookings Project costs, but within Xcel Energy it is a stand-alone project, so it was decided that it is more transparent to report it as such. The Hiawatha project was removed from our 2012 TCR rider request in Docket No. EL12-035 as its length made it ineligible for recovery. We have not included it in our 2013 request. We have also removed the St. Cloud Loop project from the 2013 TCR rider petition. This transmission line project was discontinued following the catastrophic fire and subsequent closing of the Verso Paper mill in Sartell, Minnesota. The significant loss of load from this mill made the St. Cloud Loop project no longer necessary.

In addition, the current proposed TCR rider reflects the removal of the North Mankato project approved in our 2012 TCR rider request. We have recently reassessed this project and, as currently configured, the project is anticipated to be approximately 1.00 mile of 69kV miles in length. Because the project will no longer meet the 5 mile requirement outlined by S.D. Codified Laws § 49-34A-25.1, we removed the project from the 2012 TCR tracker and we have not included it in our 2013 rider request. To adjust for the change, our proposed TCR rider reflects the removal of \$24,923 in project costs from the 2012 tracker. This impacts the 2013 carryover balance by reducing the 2012 revenue requirement, and results in a decreased revenue requirement used to calculate the 2013 rate.

Detailed project information is provided in Attachment 1.

In addition to these projects, we are also seeking recovery of net Schedule 26 revenues and expenses (also known as RECB costs) as provided for under the Midwest ISO (MISO) Tariff and discussed later in this Petition.

**ii. Supporting Information**

The Transmission Cost Recovery Statute requires certain information be provided in support of this request. This required information is provided throughout this petition and in the attached exhibits.

*S. D. Codified Laws 49-34A-25.3. states: A public utility may file annual rate adjustments to be applied to customer bills paid under the tariff approved pursuant to § 49-34A-25.2. In the utility's filing, the public utility shall provide: (1) A description of and context for the facilities included for recovery;*

Attachment 1 contains the descriptions of the projects we believe are eligible for recovery under the TCR Rider. Attachment 17 provides maps showing the locations of the facilities described in Attachment 1.

*(2) A schedule for implementation of applicable projects.*

Attachment 2 contains an implementation schedule for each of the transmission projects identified in Attachment 1.

*(3) The public utility's costs for these projects.*

Attachment 3 reports the capital expenditure forecast for each project included in the TCR. Actual capital expenditures are reported through December, 2012 and forecast capital expenditures are reported through 2017. Attachment 15 shows the development of 2013 revenue requirements for each project for the South Dakota jurisdiction, based on the capital expenditures referenced in Attachment 3.

Xcel Energy operates the transmission assets of Northern States Power Company – Minnesota and Northern States Power Company – Wisconsin as one transmission system. Pursuant to the terms of the Federal Energy Regulatory Commission (FERC) regulated *Restated Agreement to Coordinate Planning and Operations and Interchange Power and Energy between Northern States Power Company (Minnesota) and Northern States Power Company (Wisconsin)* (Interchange Agreement), all transmission costs are shared between NSPM and NSPW based on load ratio share using a FERC-approved 36-month coincident peak demand allocator. The NSPM portion is here referred to as the NSPM 36-month CP demand percentage. Within the Company, a 12-month coincident peak demand allocator is used to allocate costs between the Company's South Dakota, North Dakota, Minnesota and full requirements Wholesale jurisdictions. The South Dakota portion is here referred to as the SD 12-month CP demand percentage. A composite demand allocator for the South Dakota jurisdiction

is calculated by multiplying the NSPM 36-month CP demand percentage by the SD 12-month CP demand percentage. As a result, the Company determines the South Dakota jurisdictional portion of revenue requirements for transmission projects recovered under the TCR Rider by calculating total project revenue requirements and multiplying them by the composite demand allocator. (The allocators are provided in Attachment 10.)

*(4) A description of the public utility's efforts to ensure the lowest reasonable costs to ratepayers for the project.*

The Company has made extensive efforts to ensure the lowest reasonable cost to ratepayers for the proposed TCR-eligible projects. First, Xcel Energy transmission planners analyze up to a dozen project alternatives for a given project. Each alternative is then evaluated based on performance, cost, efficiency as measured by energy losses, and the enhancement of reliability to local consumers. Such analysis was performed for the projects included in this petition for cost recovery. Second, where possible, Xcel Energy has competitively bid engineering, equipment procurement and construction for the projects included in this petition. Third, Xcel Energy has developed a standard design for collector stations, thereby minimizing design and engineering costs.

*(5) Calculations to establish that the rate adjustment is consistent with the terms of the tariff established in § 49-34A-25.2.*

Attachment 9 contains the calculation of the proposed 2013 TCR rate factor. We believe that these calculations are consistent with the terms of the TCR tariff proposed in Attachment 15.

*S. D. Codified Laws 49-34A-25.4 - Upon receiving a filing under § 49-34A-25.3 for a rate adjustment pursuant to the tariff established in § 49-34A-25.2, the commission shall approve the annual rate adjustments if, after notice, hearing, and comment, the costs included for recovery through the tariff were or are expected to be prudently incurred and achieve transmission system improvements at the lowest reasonable cost to ratepayers.*

Based on the information provided in this Petition and the merits of the projects for which the Company requests recovery under the Transmission Cost Recovery Statute, Xcel Energy respectfully requests Commission approval of these projects for TCR recovery.

**iii. Midwest ISO Regional Expansion Criteria and Benefits (RECB) charges (MISO Schedule 26 and 26A)**

This Petition includes costs associated with RECB designated transmission projects. Xcel Energy incurs charges from MISO to pay for a portion of transmission investments of other electric utilities pursuant to Attachment FF of the MISO Open Access Transmission, Energy, and Operating Reserve Markets Tariff. Attachment FF specifies the cost allocation procedures for new transmission projects within the MISO footprint. Projects subject to RECB cost allocation are identified and selected through the MISO Transmission Expansion Plan (MTEP). Allocation and cost recovery methods for RECB projects are specified in detail in Attachment FF, Attachment GG, MM, Schedule 26 and Schedule 26A of the MISO Tariff. MISO's annual MTEP review process identifies those transmission projects that will be included in Appendix A to the MTEP and the appropriate cost-sharing mechanism is identified for each project.

The cost allocation methodology applied to RECB projects in this Petition conforms to the hybrid methodology approved by the Commission in the Settlement Stipulation in our most recent TCR rider Petition in Docket No. EL12-035. The regional transmission projects Xcel Energy proposes for hybrid allocation are discussed below.

**iv. Regional Transmission Projects Subject to Hybrid Method of Cost Allocation**

In conformance with the Commission's Order in our last TCR filing, the Company has used a hybrid, or split cost allocation method for regional transmission investments (those that qualify for regional cost allocation through MISO's tariff). The projects included in this Petition that are subject to hybrid allocation and were approved for inclusion in TCR rider recovery in Docket No. EL12-035 are the CapX2020 Fargo, Brookings, La Crosse and Bemidji projects. The Big Stone – Brookings project, a new project for which we are asking the Commission to approve as eligible for recovery in the 2013 TCR, is also subject to this hybrid allocation. On Attachment 12: "MISO Determined NSP Responsibility", the allocations listed provide the percentage breakdown of the allocation split between state and FERC jurisdictions. This hybrid methodology best facilitates cost allocation of investments to the jurisdiction creating the need for the investment.

In addition to these larger transmission projects that are subject to regional cost allocation, MISO has designated three lower voltage transmission projects that are also eligible for regional cost sharing. However, because the voltage level of these

projects are below 300 kV, the cost sharing results of the MISO tariff make these project more local than regional in their cost sharing results. These three projects are the Pleasant Valley – Byron, Glencoe – Waconia and Minn Valley transmission projects. Attachment 12 also provides the percentage breakdown of the allocation split for these projects. Because the Minn Valley project was included in the Company’s last TCR filing without recognition of the MISO cost allocation sharing, we have adjusted the 2011 and 2012 tracker reports to correct this.

Under the hybrid method, the regionally shared project costs will be allocated on a percent-of responsibility basis. These regional transmission investments for which the Company is allocated MISO Schedule 26 charges will be allocated to the state jurisdiction. They will be included in retail rate base for TCR recovery until they are rolled into base rates in a future rate case.

### **C. Tracker Account and Accounting**

#### ***i.* TCR Tracker Account**

The Company uses a tracker account as the accounting mechanism for eligible TCR project costs. The revenue requirements included in the Tracker are only those related to South Dakota’s share of eligible projects. In making our calculations, the Company used the most current data available at the time of this filing and applied the composite demand allocator described previously, which serves to:

- Allocate a share of the total costs to NSPW.
- Exclude the portion of Company costs not related to serving South Dakota retail customers. This step allocates a share of costs to the North Dakota and Minnesota retail jurisdictions, and to the firm requirements wholesale sales jurisdiction.

The result of this allocation process is that South Dakota electric customers are allocated approximately 5.1% of total transmission costs. By performing this cost allocation process, we ensure that electric customers in other jurisdictions are allocated a share of TCR revenue requirements, consistent with the Company’s allocation of similar costs in a general rate case.

Each month as revenues are collected from retail customers, the Company tracks the amount of recovery under the TCR rate adjustment and compares that amount with the monthly revenue requirements. The difference is recorded in the Tracker account as the amount of over/under recovery. A carrying charge is calculated monthly on the over- or under-recovered balance and added to the tracker balance. Any over- or

under-recovery balance at the end of the year is used in the calculation of the rate adjustment factor for the next year's forecasted revenue requirement.

***ii.* Accounting for the Tracker**

Xcel Energy calculates the monthly South Dakota jurisdictional revenue requirements (including appropriate overall return, income taxes, property taxes and depreciation), compares them with monthly TCR rate rider recoveries from customers and places the net amount in FERC Account 182.3, Other Regulatory Assets (the Tracker Account).

**D. Project Cost Recovery**

***i.* Summary**

The Cost Recovery and TCR Rate section provides support for the proposed 2013 TCR rates. This information is summarized as follows:

- The projected TCR tracker activity for 2013, including both revenue requirements and projected revenues, is included in Attachment 5.
- The projected 2013 revenue requirements proposed to be recovered under the TCR adjustment rates from South Dakota electric customers are approximately \$2.45 million. Support for this amount is included in Attachment 5. These calculations are discussed in detail below.
- Projected revenues are calculated by month as shown in Attachment 9 and are based on forecast 2013 State of South Dakota budget sales by calendar month.
- The development of the TCR adjustment factor is included in Attachment 9. The proposed factor is shown below.

***ii.* Proposed 2013 TCR Adjustment Factors**

The Company's TCR rate design is the annual calculated revenue requirements (including the current year South Dakota jurisdictional project costs and the carryover balance from the previous year) divided by the total annual forecast energy sales to South Dakota electric sales for retail customers from April through December 2013. This calculation is shown on Attachment 9.

Based on this rate design, we propose the following TCR adjustment factor:

**Table 1: 2013 Rate Factor Calculation**

		Retail
TCR Adjustment Factor	Cost Per kWh	\$0.000612
		SD retail Sales
		Apr.-Dec. 2013 1,540,225,112
		Apr.-Dec. 2013 Revenue Requirement \$2,130,845
		March 2013 Carry-Forward Balance (\$1,188,131)
		SD retail Cost
		Apr.-Dec. 2013 \$942,714

The average bill impact for a residential customer using 750 kWh per month would be \$0.46 per month. See Attachment 16 for our proposed customer bill notice.

**iii. 2013 TCR Rider Revenue Requirements**

The 2013 revenue requirements in support of the proposed TCR adjustment rates are set forth in Attachment 5. The Transmission Statute provides guidance on the calculation of revenue requirements in S. D. Codified Laws 49-34A-25.2. The Company incorporates Parts 2 through 5 of that section into the transmission project revenue requirements model in 2013. The following explains how we apply these provisions.

*S. D. Codified Laws 49-34A-25.2 (2) Allows a return on investment at the level approved in the public utility's last general rate case, unless a different return is found to be consistent with the public interest.*

The overall cost of capital to be used in the TCR Rider revenue requirement calculations is explained in Section 6 A i above.

*S. D. Codified Laws 49-34A-25.2 (3) Provides for a current return on construction work in progress, if the recovery from retail customers for the allowance for funds used during construction is not sought through any other mechanism.*

The Company's 2013 TCR revenue requirement model includes a current return on capital expenditures beginning with the cumulative CWIP balance for each project at eligibility date, or the date construction expenditures begin after that date, whichever is sooner. The beginning CWIP balance includes Allowance for Funds Used During Construction (AFUDC) incurred prior to project eligibility date. After that date, the

South Dakota jurisdictional portion of costs does not include AFUDC and a current return is calculated on the CWIP balance.

*S. D. Codified Laws 49-34A-25.2(4) Allocates project costs appropriately between wholesale and retail customers;*

Project costs are allocated to the State of South Dakota retail jurisdiction based on the demand allocator, excluding demands for NSPW as well as the Company's North Dakota, Minnesota, and wholesale customer demands. In addition, to ensure no double recovery occurs from Open Access Transmission Tariff (OATT) revenue collected from non-NSP native load customers, the Company will apply an OATT revenue credit calculated based on a forecast of OATT revenue collections divided by the transmission revenue requirements included in the OATT rate calculation for the Company's pricing zone under the MISO Transmission and Energy Markets Tariff (MISO TEMT).

For purposes of calculating projected revenue requirements, the Company proposes to use 2013 forecast demand allocators. Any resulting over/under recovery from customers as a result of the use of the 2013 demand factors will be reflected in the true up of 2013 revenues when determining the 2014 TCR adjustment rate. These demand allocators are shown in Attachment 10.

In addition to the inclusion of the above provisions in the Transmission Statute project revenue requirements model and consistent with the Commission's Orders in Docket Nos. EL11-019 and EL12-035, we include the following related costs: property taxes, current and deferred taxes and book depreciation. Attachment 14 shows the revenue requirement calculations for the proposed TCR projects.

#### **(7) Proposed Effective Date of Modified Rate**

Consistent with the 30-notice requirement under S.D. Codified Laws 49-34A-17, we propose to implement rates April 1, 2013. If the Commission acts to suspend the proposed rates, we propose to implement the rates the first billing cycle following Commission approval, or at that time the proposed rates are no longer subject to suspension.

#### **(8) Approximation of Annual Increase in Revenue**

Attachment 4 shows the TCR Tracker Account activity from 2011 through 2014. When the tracker balance from 2012 is combined with the revenue requirements from Attachment 4 for 2013, it results in a revenue requirement of \$2.45 million for 2013.

For illustrative purposes for this filing, we have calculated this amount to be passed to customers from April through December 2013 through this tariff mechanism. Pending the timing of Commission approval, we will recalculate the factor based on when we can implement the new rate. The 2013 revenue requirement represents a \$400,000 increase in revenue when compared to the \$2.1 million estimated to be recovered through the TCR in 2012.

**(9) Points Affected**

The proposed rate adjustment would be applicable to all areas served by Xcel Energy in South Dakota.

**(10) Estimation of the Number of Customers whose Cost of Service will be Affected and Annual Amounts of either Increases or Decreases, or both, in Cost of Service to those Customers**

This tariff rider is proposed to be applied to all customers throughout all customer classes as described within this petition. Xcel Energy presently serves approximately 85,000 customers in 36 communities in eastern South Dakota.

**(11) Statement of Facts, Expert Opinions, Documents, and Exhibits to Support the Proposed Changes**

Supporting information is provided in narrative throughout this Petition and in the attached Exhibits.

**PLANNED CUSTOMER NOTICE**

In accordance with ARSD 20:10:16:01(2), the Company plans to provide notice to customers comparing the prior rate and the new rate on a bill insert. Attachment 16 includes the language we propose be included with customers' bills the month the TCR factor is implemented, or as soon as is practicable after implementation of the factor.

We will work with the Commission Staff to determine if there are any suggestions to modify this bill insert.

**APPEARANCE OF COUNSEL**

The Company will be represented in this proceeding by the following counsel upon whom all pleadings, documents and other filings should be served:

Kari L. Valley  
Assistant General Counsel  
Xcel Energy  
414 Nicollet Mall, 5<sup>th</sup> Floor  
Minneapolis, MN 55401

## CONCLUSION

Xcel Energy respectfully requests that the Commission approve the proposed transmission projects as eligible for recovery and approve the revised TCR Rider Adjustment Factor for 2013 described in this filing. This revised factor is designed to recover the costs associated with significant investments in needed transmission infrastructure. The Company appreciates the interest and efforts of South Dakota policy makers in supporting that effort.

Dated: February 27, 2013

Northern States Power Company

Respectfully submitted by:



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JAMES C. WILCOX  
MANAGER  
GOVERNMENT & REGULATORY AFFAIRS