414 Nicollet Mall
Minneapolis, Minnesota 55401-1993

May 17, 2010

--Via Electronic Filing--

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

RE: REQUEST FOR RECONSIDERATION OR CLARIFICATION
TRANSMISSION COST RECOVERY ("TCR") RIDER
DOCKET NO. E002/M-09-1048

Dear Dr. Haar:

Enclosed is Xcel Energy's Request for Reconsideration or Clarification in the above referenced docket. The submission of this request for reconsideration stays the effect of the Commission Order. Thus the Company is not submitting a compliance filing to restate the Transmission Cost Recovery rate factors to be in effect in 2010, required under ordering paragraph 8. The Company will submit the compliance filing after the Commission acts on the Company's reconsideration request.

Copies of this filing have been served on those parties on the attached service list. Please call me at (612) 330-6750 if you have any questions regarding this filing.

SINCERELY,

/s/

MARK SUEL
REGULATORY CASE SPECIALIST

Enclosure
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

David C. Boyd	Chair
J. Dennis O'Brien	Commissioner
Thomas Pugh	Commissioner
Phyllis Reha	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY A MINNESOTA CORPORATION, FOR APPROVAL OF A MODIFICATION TO ITS TCR TARIFF, 2010 PROJECT ELIGIBILITY, TCR RATE FACTORS, CONTINUATION OF DEFERRED ACCOUNTING AND 2009 TRUE-UP REPORT

REQUEST FOR RECONSIDERATION OR CLARIFICATION

DOCKET NO. E002/M-09-1048

INTRODUCTION

Pursuant to Minn. Stat. §216B.27, subd. 1, and Minn. Rules Part 7829.3000, Northern States Power Company, a Minnesota corporation ("Xcel Energy" or "the Company") respectfully requests reconsideration or clarification of the Minnesota Public Utilities Commission's ("MPUC" or "Commission") April 27, 2010 ORDER APPROVING 2010 TCR PROJECT ELIGIBILITY AND RIDER, 2009 TRC TRACKER REPORT, AND TCR RATE FACTORS ("Order") in the above-referenced docket.[1]

The Company appreciates that Order allowing the Company recovery through the Transmission Cost Recovery ("TCR") Rider certain 2010 transmission project costs pursuant to Minn. Stat. §216B.16, Subd. 7b. However, the Order denies recovery, in the 2010 TCR rate factors, of the costs the Company has incurred and expects to incur through the end of 2010 related to the proposed

[1] The submission of this request for reconsideration stays the effect of the Commission Order. Thus the Company is not submitting a compliance filing to restate the Transmission Cost Recovery rate factors to be in effect in 2010, required under ordering paragraph 8. The Company will submit the compliance filing after the Commission acts on the Company's reconsideration request.

Brookings - Twin Cities 345 kV transmission line ("Brookings Project") because the ultimate cost recovery methodology under the Midwest Independent Transmission System Operator, Inc. ("Midwest ISO" or "MISO") Tariff is not yet determined. The Commission should reconsider its Order because (a) Minn. Stat. §216B. 16, Subd. 7b, (the "Transmission Statute") was designed to support new transmission projects even when there is uncertainty, and (b) the uncertainty currently challenging the Brookings Project -- cost allocation -- was addressed at the Certificate of Need hearing for the project.

As discussed below, contemporaneous with this Request for Reconsideration, the Applicants to the 345 kV Certificate of Need for the Brookings Project (the Company and Great River Energy, on behalf of the other proposed owners of the project) will submit a Notice of Change in Timing of the Brookings Project, ("Notice of Change Filing") indicating the in-service date for the project is now anticipated for second quarter 2015. The Notice of Change Filing indicates the prudent steps taken to minimize costs until there is greater certainty regarding the final MISO cost allocation methodology applicable to the Brookings Project as well as to recognize the delays in project schedule that have already occurred.[2]

Xcel Energy respectfully requests that the Commission reconsider the Order or in the alternative clarify its Order. The goal of this petition for reconsideration and our Notice of Change Filing, when taken together, is to achieve an acceptable going forward plan for the Brookings Project that addresses how far the Commission would like the Company and the other CapX2020 participants to proceed until the MISO cost allocation issue is resolved, and the appropriate means of cost recovery (or cost treatment) during that period.

The Company submits this request, in part, because despite the oral statements at the hearing that the Commission does not intend to discourage the CapX2020 participants from continuing to proceed with the Brookings Project while the MISO cost allocation issue is resolved, the Order is silent on this point. The Brookings Project was developed, in part, to implement Minnesota energy policy, by allowing Minnesota utilities, including Xcel Energy, to meet the Renewable Energy Standard ("RES") requirements adopted by the Legislature (a 25 percent wind generation requirement by 2020 for Xcel

[2] The revised 2015 in-service date, however, is contingent upon work moving forward for the remainder of 2010 and 2011. Thus, between this request for reconsideration and the changed circumstance filing, the Company seeks to find an acceptable path to keep the Brookings Project moving forward without committing shareholders and customers to an unreasonable level of cost in the event, albeit unlikely, that MISO cost allocation concerns either stop or significantly delay the Brookings Project.

Energy). The Brookings Project already faces uncertainty because it does not neatly fit into any "box" under the MISO Tariff. The Order, perhaps inadvertently, adds to the uncertainty regarding development of the Brookings Project. Statements at the hearing regarding ultimate cost recovery should the project be abandoned heighten our concerns as to whether the Company should perhaps cease an already slowed development schedule for the Brookings Project.

If the Commission wishes to send a strong signal to the Company (and other CapX2020 Participants) to continue Brookings Project development activities, the most direct way to express that policy guidance would be to allow TCR recovery of the Company's relatively small revenue requirements for expenditures through 2010 ($1.9 million), despite the uncertainty regarding the eventual MISO cost allocation method for the total Brookings Project costs (which could range up to approximately $522 million for the Company's share).

Alternatively, if the Commission does not grant 2010 TCR recovery, the Company respectfully requests that the Commission clarify its Order and provide guidance on (a) whether further project development activities should continue, be scaled back, or cease; and (b) if they are to continue, the investment amount the Company should not exceed pending resolution of the MISO cost allocation issue.

If the Commission does not feel the record is sufficiently developed in this proceeding for the Commission to take this step at this time, we request that the Commission direct the Company, the Office of Energy Security ("OES") and other interested parties to work through these issues and return a plan to the Commission regarding future investments in the Brookings Project pending resolution of the MISO cost allocation issue.[3]

In summary, the Company and the other CapX2020 participants believe it is important for the Commission to provide clearer direction regarding this project through its Order on reconsideration in this proceeding.

[3] At hearing the Company orally suggested that one approach would be to agree on the level of costs at various steps that the Company should incur pending certainty regarding future MISO cost recovery. An order requiring the interested parties to work out a solution would be consistent with that approach.

I. REQUEST FOR RECONSIDERATION

A. Procedural Background and Summary of Arguments

On May 22, 2009, the Commission issued an Order granting Certificates of Need for the CapX2020 Brookings, Fargo and La Crosse 345 kV transmission lines.[4] On July 14, 2009, the Commission granted a Certificate of Need for the Bemidji 230 kV transmission line.[5]

On September 3, 2009, the Company submitted its proposed TCR petition, seeking Commission approval of the TCR rate factors to be in effect for 2010. In its TCR Petition, the Company requested recovery of $3.5 million in 2010 revenue requirements for the four CapX2020 projects, which was reduced to $2.9 million in the Company's reply comments. In its Comments and Reply Comments, the OES recommended the Commission accept the Company request for TCR cost recovery with respect to the Fargo, La Crosse and Bemidji CapX2020 Projects, but recommended that the Company not be allowed TCR recovery for the Brookings Project[6] for the following reasons:

- Xcel [Energy] ratepayers should not be required to pay for costs that may ultimately be assigned to other parties.
- Allowing Xcel [Energy] to recover costs from its ratepayers at this time may have an undue influence on the subsequent proceedings regarding ownership and cost responsibility.

The Commission Order largely followed the OES recommendations.[7] The Order states:

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4 ORDER GRANTING CERTIFICATES OF NEED WITH CONDITIONS, Docket No. ET-2,E002/CN-06-1115 ("CON Order") (May 22, 2009); and ORDER GRANTING AND DENYING MOTIONS FOR RECONSIDERATION, AND MODIFYING CONDITIONS (August 10, 2009) ("CON Reconsideration Order").

5 *See, In the Matter of the Application of Otter Tail Power Company, Minnesota Power and Minnkota Power Cooperative, Inc. for a 230 kV Transmission Line From Bemidji to Grand Rapids, Minnesota,* Docket No. E-017,E-015,ET-6/CN-07-1222, ORDER GRANTING CERTIFICATE OF NEED (July 14, 2009).

6 In its reply comments, the Company reduced the 2010 Brookings Project costs to be recovered in the 2010 TCR rate factors to $1.2 million. See Xcel Energy Reply Comments at p.8. However, the 2009 TCR true-up included recovery of $670,000 of revenue requirements associated with the Company's 2009 investments in the Brookings Project after issuance of the Certificate of Need order. So the total proposed 2010 TCR recoveries for the Brookings Project were $1.9 million in the Company's reply comments.

7 The Order also limited the 2010 TCR recoveries associated with the Wilmarth to Blue Lake 345 kV reconstruction project to an amount based on the Companies original capital budget estimate ($6 million) and appears to have established a "cap" on TCR recoveries linked to the Company's initial capital budget estimate. While the Company believes these policy decisions were incorrect for the reasons stated in its Reply Comments and at the April 1 hearing, the Company is not seeking reconsideration of the Order on those issues. The Company will work with the OES in preparation for the 2011 TCR rate factor filing to seek to establish reasonable processes regarding capital budgeting estimates and revisions.

> The Commission concurs with the OES, that it is speculative and premature to commence rate recovery on the Brookings CapX line at this point. While the Company suggests that its more conservative request for cost recovery of $1.2 million should justify inclusion of the Brookings project in its 2010 revenue requirement, the Commission does not agree. Allowing Xcel to recover costs from its ratepayers at this time could potentially have an impact on a subsequent proceeding regarding ownership and cost responsibility for the Brookings project in 2010, due to the continuing uncertainty related to the MISO process and its impact on the final level of cost allocations among the various participants.

This Commission decision appears to be at odds with the record in the CON proceeding, the Transmission Statute authorizing the TCR Rider and the terms of the TCR Rider tariff.

One of the underlying purposes of the TCR enabling legislation was to encourage utilities to undertake long lead time projects that faced substantial risks of never coming to fruition. The Legislature attempted to address both the financial impacts and the regulatory risk by allowing for rider recovery of costs only after certain thresholds are cleared which would indicate the project is likely to proceed (e.g., issuance of a certificate of need).

The Order, by denying rider recovery in spite of having met the statutory criteria, adds back into the mix the very uncertainty that the Legislature intended to alleviate by enacting the Transmission Statute. The final Midwest ISO cost allocation process is not likely to be decided by the Federal Energy Regulatory Commission ("FERC") until at least 2011. By the time the Commission and Company have greater certainty regarding MISO cost allocation, the Company may have expended several millions of additional dollars. Whether intended or not, the Order has created significant questions about ultimate cost recovery, and as a consequence, caused the Company to question whether the CapX2020 utilities should be further slowing down or even ceasing development activities and expenditures for the Brookings Project until the MISO cost allocation issue is resolved.

Thus the Commission should reconsider the Order and allow the Company to recover the revenue requirements for the Brookings Project in the 2010 TCR rate factors. However, as discussed in Part II, if the Commission does not allow TCR recovery in 2010, the Commission should clarify its Order to provide guidance on (a) whether further project development activities should continue, be scaled back, or cease; and (b) if the project development efforts are to continue, the investment amount the Company should not exceed pending resolution of the MISO cost allocation issue. Alternatively, should the Commission not feel comfortable taking this step at this time, we request that the Commission direct parties to work through these issues and return to the Commission with a proposal for guidance regarding future investments in the Brookings project.

B. MISO Cost Recovery Uncertainty Was Recognized in the CON Proceeding And Will Continue To Be An Evolving Uncertainty For Future Projects.

The Order largely relies on the OES assertions that cost recovery should be denied because of uncertainty regarding the ultimate wholesale transmission cost recovery methodology to be applied to the Brookings Project under the Midwest ISO Tariff under the jurisdiction of the FERC.

The Company recognizes the methodology for wholesale transmission rate recovery for the Brookings Project is yet to be determined. However, this uncertainty is not new information. In the application in the CON proceeding, the Company indicated the specific cost recovery methodology under the MISO Regional Expansion Criteria and Benefits ("RECB") cost allocation tariff was not certain. The Applicants stated they assumed the Brookings Project would be treated as a Baseline Reliability Project, with 20 percent of the costs being recovered under MISO regional rates, and 80 percent recovered through a more local allocation based on the MISO Line Outage Distribution Factor ("LODF") methodology.[8] However, the application expressly indicated the project had not been moved to Appendix A to the Midwest ISO Transmission Expansion Plan ("MTEP"), and MISO could determine the project to be a Generation Interconnection Project, which would, under the Midwest ISO tariff provisions applicable at the time of the initial CON Order, require the interconnecting generators to fund 50 percent of the project costs, with remaining 50 percent funded by the Baseline Reliability Project methodology.[9]

[8] CON Application, Appendix D-5, pp. 1-2.

[9] CON Application, Appendix D-5, p. 10. To date, the Midwest ISO has not made a final determination regarding the appropriate RECB classification of the Brookings Project.

Thus the Company disclosed the uncertainty regarding cost allocation under the MISO Tariff in the CON Application. The decision to deny TCR recovery, without guidance in the Order regarding the Commission's intent that the CapX2020 participants continue development activities, stands in contrast to the prior Commission orders regarding the Brookings Project, therefore justifying reconsideration.

C. The Basis for Denial Creates Uncertainty Regarding Support for the Project.

The Minnesota Legislature enacted the Transmission Statute in 2005. It authorizes the Commission to approve a tariff mechanism for an automatic annual adjustment of charges for new transmission facilities. On August 1, 2006, Xcel Energy petitioned the Commission in Docket No. E002/M-06-1103 to establish a new TCR tariff and to combine recovery of eligible projects as defined by both the Transmission Statute and the Renewable Statute (Minn. Stat. §216B.1645) in one automatic recovery mechanism: the TCR adjustment rider. The Commission approved the petition in its ORDER APPROVING TRANSMISSION COST RECOVERY RIDER, issued November 20, 2006.

There is no dispute in the record that the Brookings Project meets the terms of the Transmission Statute. The Brooking Project was separately filed and reviewed and approved by the Commission in the CON Order under Minn. Stat. Section §216B.243, satisfying the only statutory standard for recovery under the Transmission Statute and the TCR Rider. Moreover, the Commission has approved "a tariff mechanism for the automatic adjustment of charges" for the Minnesota jurisdictional costs of the Brookings Project, and there is no dispute in the record that the Brookings Project satisfies the terms of the TCR Tariff.

While we recognize the concerns over MISO cost allocation exist, we do not believe that the 2010 Brookings Project expenditures and recovery request will implicate either of the concerns raised by the OES. The OES recommendation was based on the assertion that the Company might over-recover its costs if TCR recovery were allowed, or that allowing TCR recovery might somehow influence the treatment of the Brookings Project in the Midwest ISO cost allocation docket at FERC. The record does not support these assertions.

First, there is no basis in the record for the Commission to conclude that the Company might over-recover its costs. Instead, the record indicates the Company will still need to invest substantial amounts ($160 million), well beyond those investments planned through 2010 (estimated at $16 million in the Company's reply comments), even if the interconnecting generators were required to fund the vast majority (e.g., 80 percent) of the Brookings Project under the ultimate MISO RECB tariff mechanism. See Xcel Energy reply comments at p. 6. Thus the costs that would ultimately be borne by the Company's Minnesota retail ratepayers for the Brookings Project will far exceed the recoveries proposed in 2010, irrespective of the cost allocation methodology MISO may apply to the Brookings Project. The TCR Rider reduces total project costs and future rate recoveries by allowing more current recovery of the Minnesota jurisdictional share of the revenue requirement associated with the Brookings Project development costs.

In addition, it is important to recognize that the benefit of TCR recovery will accrue *only* to Minnesota retail ratepayers. Irrespective of the cost allocation methodology eventually applied by MISO to the Brookings Project at the wholesale level, the Company's accounting processes will ensure the savings in total project costs made possible by more current TCR recovery will accrue only to Minnesota retail ratepayers, and those benefits are not shared with either other jurisdictions (e.g., Wisconsin or North Dakota) or wholesale customers taking service under the MISO tariff. The Order does not appear to recognize these facts; on reconsideration, the Commission should consider this additional information previously provided in response to the OES recommendations.

Second, there is no record evidence supporting the OES assertion that a Commission decision allowing TCR recovery might influence the MISO cost allocation process. The Midwest ISO's complicated process of regional tariff development for the July 15, 2010 filing has been guided primarily by the Organization of MISO States Cost Allocation Regional Planning group ("OMS CARP"), the RECB Task Force and the MISO Transmission Owners group. No decision by the Commission regarding the proposed 2010 TCR Rider recovery could reasonably be viewed as affecting the MISO Tariff cost allocation process.

Finally, uncertainty exists for all transmission projects, whether the uncertainty is related to the final route (and resulting cost changes) or other factors. The MISO cost allocation process is an uncertainty, but not one that should cause project development activities to cease. As indicated in our contemporaneous Notice of Change Filing, the CapX2020 participants have responded to the uncertainty appropriately by reducing 2010 costs. However, for the Brookings Project to remain on the revised schedule for a 2015 in-service date, the

Commission's leadership in the instant proceeding and in response to our Notice of Change Filing in the CON docket is essential.

II. <u>REQUEST TO CLARIFY ORDER</u>

A. The Commission Should Provide Clarification That it Will Support Efforts To Complete Route Permitting And Engineering Design So As To Meet The Currently Anticipated 2015 In-Service Date

At the April 1, 2010 Commission hearing, at least one Commissioner orally commented that the Commission's ruling disallowing recovery of the Brookings Project should not be viewed as an indication of lack of support for the Brookings Project. However, the Commission Order -- which does not include such an indication of Commission support for the Brookings Project -- can be taken to imply that the Company should not continue project development associated with the Brookings Project (other than completing the pending Route Permit process) until after FERC decides the issue of cost allocation under the Midwest ISO Tariff. Furthermore, some of the oral discussion and exchange among parties during the hearing suggested that perhaps recovery of development costs would not be appropriate if the project ultimately does not go forward.

The Company is committed to working through the issues that face the Brookings Project and see it to a successful completion. However, we are concerned that the absence of TCR cost recovery, or at least any further guidance in the Commission's Order regarding future project development, amplifies the uncertainty and risk associated with moving forward with the project.

As noted, the Applicants to the 345 kV Certificate of Need for the Brookings Project (the Company and Great River Energy, on behalf of the other potential owners) are contemporaneously submitting a Notice of Change Filing regarding the timing of the Brookings Project, indicating the in-service date for the project is now anticipated for second quarter 2015. The Notice of Change Filing indicates that greater certainty regarding the final MISO cost allocation methodology applicable to the Brookings Project is needed so the various CapX2020 participants can make their final investment decisions, a necessary prerequisite in order for the project to proceed to construction. The Notice of Change Filing also presents our assessment of the impact of the cost allocation issue on our development plans during the next several months.

In order to preserve our ability to meet a 2015 in-service date and avoid raising the overall cost of the project substantially, we believe it prudent to proceed with preliminary engineering and other preparations. The plan is intended to conservatively manage further commitments to the project in light of uncertainty, yet position the project to move forward as quickly as possible once remaining hurdles related to cost allocation are overcome. However, we struggle with the prudence of committing several million additional dollars in an environment of uncertainty in the absence of more explicit guidance from the Commission.

Both the OES recommendations and the Commission Order are an understandable reflection of the same uncertainty faced by the proposed utility investors in the Brookings Project. However, while responding to this uncertainty by slowing certain aspects of development, the inability for the Company to recover prudently incurred costs potentially signals that ceasing expenditures, rather than slowing the pace and timing of such expenditures, may be a more appropriate response. The Company believes it is essential that the Commission either clarify its Order to support the planned efforts discussed in the Notice of Change Filing, or direct the Company, the OES and other interested parties to bring back an interim project development and expenditure plan for Commission consideration.

The importance of this step should not be understated. While the Midwest ISO will file the replacement cost allocation tariff with FERC by July 15, 2010, that tariff filing will almost certainly be protested and likely litigated. The final FERC decision on the MISO cost allocation tariff could thus be one or two years away. The Commission could most clearly indicate to the Company and the other CapX2020 utilities that they should proceed with the Brookings Project, while the Midwest ISO cost allocation issue is being resolved, by granting reconsideration and allowing the Company cost recovery for the Brookings Project in 2010 through the TCR mechanism.

However, should the Commission not be prepared to take this step, the Company respectfully requests that the Commission clarify its Order by providing guidance regarding whether further Brookings Project development activities should be scaled back pending the outcome of the Midwest ISO cost allocation issue or continue, as we discuss in the Notice of Change filing. If the Commission does not believe the record is sufficient for the Commission to provide such guidance at this time, we respectfully request that the Commission direct the Company and other interested parties to work through these issues and return a proposal to the Commission regarding future investments in the Brookings Project pending resolution of the MISO cost allocation issue.

CONCLUSION

Xcel Energy recognizes the importance and complexity of the issues before the Commission. However, based on the foregoing, we respectfully request that the Commission grant reconsideration, and allow recovery of the $1.9 million in revenue requirements associated with the Brookings Project through the 2010 TCR Rider rate factors. In the alternative, the Commission should clarify its order and provide clear direction regarding the timing and prudency of current and near term future investments in the Brookings Project. If the Commission does not believe the record is sufficient for the Commission to take this step at this time, we request that the Commission direct the Company and other interested parties to work through these issues and return a proposal to the Commission regarding future investments in the Brookings Project pending resolution of the MISO cost allocation issue.

Respectfully submitted,

/s/ *James P. Johnson*

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James P. Johnson
Assistant General Counsel
Xcel Energy Services Inc.
414 Nicollet Mall - 5th Floor
Minneapolis, MN 55401

Attorney for Northern States Power Company, a Minnesota corporation

Dated: May 17, 2010

CERTIFICATE OF SERVICE

I, Carole Wallace, hereby certify that I have this day served copies or summaries 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/M-09-1048

Dated this 17th day of May 2010

/s/

____

Carole Wallace
Regulatory Coordinator

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