



Minnesota Center for Environmental Advocacy

Using law, science, and research to protect Minnesota's environment, its natural resources, and the health of its people.

26 East Exchange Street - Suite 206
Saint Paul, MN 55101-1667

651.223.5969
651.223.5967 fax

info@mncenter.org
www.mncenter.org

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(1899-1982)

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January 25, 2016

The Honorable Jeffrey Oxley
Administrative Law Judge
600 North Robert Street
P.O. Box 64620
St. Paul, MN 55164-0620

VIA ELECTRONIC SERVICE

*Re: In the Matter of the Application of Northern States Power Company for
Authority to Increase Rates for Electric Service in the State of Minnesota
PUC Docket No.: E-002/GR-15-826*

Dear Judge Oxley,

In connection to the above-captioned docket enclosed please find the Petition to Intervene filed on behalf of Fresh Energy, Sierra Club, Wind on the Wires, National Resources Defense Council, and Minnesota Center for Environmental Advocacy (collectively "Clean Energy Organizations"). Also attached is an affidavit of service.

Sincerely,

/s/ Hudson B. Kingston
Hudson B. Kingston
Staff Attorney

HBK/em

Enclosure

cc: Service List

**STATE OF MINNESOTA
THE PUBLIC UTILITIES COMMISSION**

In the Matter of the Application of
Northern States Power Company for
Authority to Increase Rates for Electric
Service in Minnesota

PUC Docket No. E-002/GR-15-826

**PETITION TO INTERVENE OF FRESH ENERGY, SIERRA CLUB,
WIND ON THE WIRES, NATURAL RESOURCES DEFENSE COUNCIL,
AND MINNESOTA CENTER FOR ENVIRONMENTAL ADVOCACY**

Pursuant to Minn. R. 1400.6200, Fresh Energy, Sierra Club, Wind on the Wires (“WOW”), Natural Resources Defense Council (“NRDC”), and Minnesota Center for Environmental Advocacy (“MCEA”) (collectively, “Petitioners”) hereby petition to intervene in the above-referenced docket.

Fresh Energy is a nonprofit organization that works in the public interest to catalyze state and regional policy and regulation that will stimulate the technological advancements necessary for an energy system that sustains the economy, people, and the planet. Sierra Club is a national nonprofit environmental organization with over 620,000 members working to protect and promote safe and healthy communities, to practice and promote the responsible use of the Earth’s ecosystems and resources, and to protect and restore the environment. A large portion of Sierra Club’s Minnesota members are Northern States Power Company’s (“NSP” or “the Company”) ratepayers. Sierra Club’s Beyond Coal Campaign advocates for a nationwide transition from coal to clean energy in the electric sector and supports efforts by federal and state regulators to address the causes and impacts of climate change. WOW is a policy organization focused on prioritizing the delivery of large amounts of all types of wind energy to markets in the Upper Midwest, and represents members who produce wind power and technology who have a direct interest in energy rates at issue in this case. WOW is actively engaged in wind power and

transmission issues in both technical and regulatory arenas in the MISO footprint. NRDC is a national nonprofit with over thirty years of experience working on state energy policy, including utility regulation and energy efficiency. NRDC's membership includes approximately 7,263 Minnesota residents, a large number of whom are NSP customers. MCEA is a nonprofit environmental organization that works in the courts, the legislature, and state agencies to protect Minnesota's wildlife, natural resources and the health of its people. MCEA's five program areas include an Energy Program to advance the pursuit of environmentally sustainable energy policies. A majority of MCEA's members are NSP ratepayers.

Consistent with their respective missions, Petitioners regularly participate in resource planning, evaluation and acquisition matters before the Minnesota Public Utilities Commission ("the Commission"), with an interest in advancing resource choices that minimize or eliminate pollutant emissions, and maximize energy efficiency. Because rate determinations have a direct impact on both utility and consumer behavior and investment, Petitioners have an interest in the outcome of this proceeding. Petitioners have participated in past NSP rate cases, advocating for their members' legal rights and interests.

Petitioners are directly affected by and have an interest in addressing NSP's proposal to increase its fixed customer charge for residential and small commercial customers, a proposal that dampens the incentive for customers to conserve energy. A revenue structure that removes disincentives for the utility to promote energy efficiency directly affects Petitioners, whose missions include promotion of efficiency and conservation. In addition, Petitioners have an interest in NSP's recently-adopted revenue decoupling pilot as a means to accomplish the utility's energy conservation goals. Petitioners were instrumental in supporting the adoption of decoupling in the Company's last rate case. While the Company appears to propose no changes

to its revenue decoupling mechanism in its current filing, Petitioners remain interested in the continued implementation of the mechanism as a tool that may obviate the Company's request for a customer charge increase in this rate case. Petitioners are interested in ensuring that the Company's apportionment of costs and rate design are crafted so as to advance the goals of energy conservation, energy efficiency, and affordability. Finally, Petitioners are participating in the Commission's parallel docket on alternative rate design that arose under NSP's prior rate case, and participation in that other proceeding will inform Petitioners' ability to participate in the rate design discussions that will continue to be incidental to the rate case. Without Petitioners' continued participation in both dockets it is more likely that the two proceedings will reach inconsistent outcomes due to divergent goals.

Petitioners will also be interested in contributing to the discussion of NSP's distribution investments, and how they will meet the need for a modernized grid that supports and properly incorporates distributed generation. By the same token, Petitioners are interested in supporting renewable energy expansion from sources of all scales, including transmission infrastructure to support such projects. To the extent that NSP is proposing grid modernization projects both in this rate case and in a parallel Commission docket, Petitioners will be able to add unique perspective on these proposals and their usefulness in meeting efficiency and clean energy goals. Grid modernization and transmission funding under this rate case have a direct bearing on the legal rights of Petitioners' members, as well.

Petitioners also have a general interest in understanding fully the relationship between lower consumer energy demand and the rates charged under modern rate design structures such as decoupling. Petitioners are particularly interested in the effect rate changes could have on the transition away from existing fossil fuel-based resources. Petitioners support directing ratepayer

money to investments in clean energy resources and programs that hasten the transition away from fossil fuels in order to protect ratepayers from future risks. Petitioners' attention to the environmental and public health consequences, direct or indirect, of the outcome of this proceeding is unique.

For the foregoing reasons, Petitioners respectfully request full party status in this matter. If allowed, Petitioners intend to participate in this contested case jointly.

Dated: January 25, 2016

Respectfully submitted,

/s/ Hudson B. Kingston

Hudson B. Kingston
Minnesota Center for Environmental Advocacy
26 E. Exchange Street, Ste. 206
St. Paul, MN 55101
(651) 287-4880
hkingston@mncenter.org

Attorney for Fresh Energy, Sierra Club, Wind on the Wires, and Minnesota Center for Environmental Advocacy

/s/Samantha Williams

Samantha Williams
Natural Resources Defense Council
20 N Wacker Drive, Suite 1600
Chicago, IL 60606
Tel: (312) 651-7930
swilliams@nrdc.org

Attorney for Natural Resources Defense Council

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS
FOR THE PUBLIC UTILITIES COMMISSION

In the Matter of the Application of Northern
States Power Company for Authority to
Increase Rates for Electric Service in the State
of Minnesota

AFFIDAVIT OF SERVICE

MPUC Docket No. E-002/GR-15-826

STATE OF MINNESOTA)
)ss.
COUNTY OF RAMSEY)

Erin Mittag being duly sworn, says that on the 25th day of January, 2016, she served via U.S. mail and e-dockets the following:

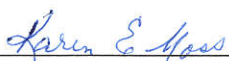
- Petition to Intervene on behalf of Fresh Energy, Sierra Club, Wind on the Wires, National Resources Defense Council, and Minnesota Center for Environmental Advocacy (collectively "Clean Energy Organizations").

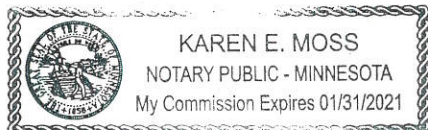
on the following persons, in this action, by filing through e-dockets or mailing to them a copy thereof, enclosed in an envelope, postage prepaid, and by depositing the same in the post office at St. Paul, Minnesota, directed to said persons at the last known mailing address of said persons:

Attached Service List.


Erin Mittag

Subscribed and sworn to before me
this 25th day of January, 2016


Karen Moss



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-826_Official
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_15-826_Official
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_15-826_Official
Alison C	Archer	alison.c.archer@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_15-826_Official
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-826_Official
Ryan	Barlow	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_15-826_Official
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	150 South Fifth Street, Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-826_Official
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-826_Official
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_15-826_Official
Jeanne	Cochran	Jeanne.Cochran@state.mn.us	Office of Administrative Hearings	P.O. Box 64620 St. Paul, MN 55164-0620	Electronic Service	Yes	OFF_SL_15-826_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_15-826_Official
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-826_Official
James	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, Fifth Floor Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_15-826_Official
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_15-826_Official
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-826_Official
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-826_Official
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_15-826_Official
Stephen	Fogel	Stephen.E.Fogel@XcelEnergy.com	Xcel Energy Services, Inc.	816 Congress Ave, Suite 1650 Austin, TX 78701	Electronic Service	No	OFF_SL_15-826_Official
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_15-826_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Benjamin	Gerber	bgerber@mnychamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_15-826_Official
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_15-826_Official
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	OFF_SL_15-826_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_15-826_Official
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-826_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_15-826_Official
Sarah	Johnson Phillips	siphillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-826_Official
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	OFF_SL_15-826_Official
Thomas	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_15-826_Official
Mara	Koeller	mara.n.koeller@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-826_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_15-826_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_15-826_Official
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_15-826_Official
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_15-826_Official
Matthew P	Loftus	matthew.p.loftus@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-826_Official
Paula	Maccabee	Pmaccabee@justchangela.w.com	Just Change Law Offices	1961 Selby Ave Saint Paul, MN 55104	Electronic Service	No	OFF_SL_15-826_Official
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_15-826_Official
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_15-826_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-826_Official
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	Yes	OFF_SL_15-826_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_15-826_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_15-826_Official
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_15-826_Official
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_15-826_Official
Carol A.	Overland	overland@legalectric.org	Legalelectric - Overland Law Office	1110 West Avenue Red Wing, MN 55066	Electronic Service	No	OFF_SL_15-826_Official
Jeff	Oxley	jeff.oxley@state.mn.us	Office of Administrative Hearings	600 North Robert Street St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-826_Official
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	Yes	OFF_SL_15-826_Official
Amanda	Rome	amanda.rome@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-826_Official
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_15-826_Official
Inga	Schuchard	ischuchard@larkinhoffman.com	Larkin Hoffman	8300 Norman Center Drive Suite 1000 Minneapolis, MN 55437	Electronic Service	No	OFF_SL_15-826_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	Yes	OFF_SL_15-826_Official
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-826_Official
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-826_Official
Byron E.	Starns	byron.starns@stinson.com	Stinson Leonard Street LLP	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-826_Official
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-826_Official
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-826_Official
SaGonna	Thompson	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	Yes	OFF_SL_15-826_Official
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-826_Official
Adam	Wattenbarger	awattenbarger@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-826_Official
Scott M.	Wilensky	scott.wilensky@xcelenergy.com	Xcel Energy	7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_15-826_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_15-826_Official
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-826_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-826_Official
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-826_Official