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PUBLIC SERVICE COMMISSION

September 19, 2008

—VIA ELECTRONIC FILING—

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

RE: REPLY COMMENTS  
INACCURATE GAS METERS, RECALCULATION OF BILLS, AND RELATED ISSUES  
DOCKET NO. G-002/CI-08-871

Dear Dr. Haar:

Northern States Power Company (“Xcel Energy” or the “Company”) submits its Reply Comments in the above-referenced matter, in response to the Comments of the Minnesota Office of Energy Security (“OES”) and the Minnesota Office of Attorney General – Residential Utilities Division (“OAG”) dated September 9, 2008.

We have served a copy on the Attorney General’s Office- Residential Utilities Division and all parties on the attached service list.

Please contact me at (612) 330-6064 if you require any additional information.

Sincerely,

/s/

BRIA SHEA  
CASE SPECIALIST

Enclosures

C: Service List

16 PU-08-627 Filed: 9/22/2008 Pages: 18  
Reply Comments of Northern States Power before  
the MN Public Utilities Commission

Public Service Commission

PSC Staff

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

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

IN THE MATTER OF AN INVESTIGATION  
INTO NORTHERN STATES POWER  
COMPANY, A MINNESOTA CORPORATION,  
INACCURATE GAS METERS,  
RECALCULATION OF BILLS, AND RELATED  
ISSUES

DOCKET No. G-002/CI-08-871

**REPLY COMMENTS**

**INTRODUCTION**

Northern States Power Company, a Minnesota corporation (“Xcel Energy” or the “Company”) submits to the Minnesota Public Utilities Commission (the “Commission”) this Reply to the Minnesota Office of Energy Security (“OES”) and Minnesota Office of Attorney General – Residential Utilities Division (“OAG”) comments in the above referenced Docket.

We additionally provide as Attachment A, a chart of the total number of Minnesota customers rebilled as a result of this 1074 v.2 model module failure, by date, for the record. Further, in conjunction with our suspension of customer rebilling at the end of July 2008, we applied a 60-day credit hold on all accounts potentially affected by this 1074 v.2 model module issue. We have recently extended this hold, in light of the upcoming heating season, and to allow time for the Commission to consider this matter.

**REPLY**

We appreciate the Comments from both the OES and OAG (collectively, the “State Agencies”), and provide below our Reply Comments to the specific areas addressed in these Comments.

## **A. Comments from the Minnesota Office of Energy Security**

We appreciate the OES' support for our proposed Rebilling Plan pending the submission and consideration of additional information. We accept all recommended changes to our proposed customer letter, and provide below, the additional information requested.

### *1. Regulatory Communications*

In our August 21, 2008 Filing, the Company acknowledged that our communication with the Commission and its Consumer Affairs Office was neither timely nor sufficient. We also identified that we were reviewing our processes to ensure that, going forward, we would identify issues of this nature and communicate them to the appropriate regulatory agencies and stakeholders in a timelier manner.

We think it is critical that we work with the Commission and the State Agencies on the development of this process to outline expectations and identify a supportive process. We think the critical factors of a new process would include:

- Definition of issues of importance to our regulators; and
- Consistent and timely:
  - Internal communication to regulatory personnel of issues that meet the agreed-upon criteria;
  - Agency notification of the issue, our resolution, if known, customer impact, and timing; and
  - Follow-up and status reporting regarding resolution.

We propose to work with the State Agencies over the next 60 days on a process that addresses these critical factors, and when complete, submit it to the Commission as Supplemental Information in this Docket.

### *2. Low-Income Customers*

The Company understands the complexity of the rebill process and its impacts on low-income customers. The primary challenge is the availability of funds to assist low-income customers with both the rebilled amount and the anticipated heating bills for this heating season. We believe that, through existing programs, we can provide significant relief to affected customers.

Our guiding principles in dealing with the rebilling of our low-income customers will be to conduct aggressive outreach to customers who received heating assistance during the 2007/08 heating season that were impacted by the 1074 v.2 model module failure and assist them in qualifying for the Company's Gas Affordability Program ("GAP") that took effect on January 1, 2008. The guiding principles of the GAP are level of income, amount of arrears, and high consumption. We believe that by making this outreach we can achieve our objective of minimizing negative impacts on our low-income customers. To the extent customers did not apply for assistance in the 2007/08 heating season, and express a concern to the Company regarding their ability to pay the rebilling amount, we will provide the same guidance to available assistance options.

We provide the Gas Affordability Program/Low Income Energy Discount Rider tariff pages from our Natural Gas Rate Book, as Attachment B to this Reply.

To illustrate this point, the Company offers two examples of how the GAP program will assist low-income customers:

**Example 1**

Customer is current with their payments. Customer is rebilled and receives an additional \$300 of gas charges covering the period of the 1074 v.2 model module failure.

Total Annual Natural Gas Bill ( <i>not including rebilled amt</i> )	\$ 1,000
Household Income ( <i>annual</i> )	\$ 10,000
Customer Required Payment ( <i>6% of Income</i> )	\$ 600
Customer Current Monthly Payment:	\$ 50
Supplemental Assistance/Forgiveness	\$ 400

Total natural gas billing amount of \$1,000 minus the \$600 customer payment equals \$400 in supplemental assistance/forgiveness of total annual natural gas billing amount.

Additional Natural Gas Bill	\$ 300
12 Months Repayment	\$ 25
Monthly Customer Payment	\$ 12.50
Monthly Company Supplement	\$ 12.50
Total Natural Gas Charges for year	\$ 1,300

Total Customer Payments	\$ 650
Total Customer Benefit	\$ 650

**Example 2**

Customer is current with their payments. Customer is rebilled and receives an additional \$450 of gas charges covering the period of the 1074 v.2 model module failure.

Total Annual Natural Gas Bill ( <i>not including rebilled amt</i> )	\$ 1,500
Household Income ( <i>annual</i> )	\$ 20,000
Customer Required Payment ( <i>6% of Income</i> )	\$ 1,200
Customer Current Monthly Payment	\$ 100
Supplemental Assistance/Forgiveness	\$ 300

Total natural gas billing amount of \$1,500 minus the \$1,200 customer payment equals \$300 in supplemental assistance/forgiveness of total annual natural gas billing amount.

Additional Natural Gas Bill	\$ 450
12 Months Repayment	\$ 37.50
Monthly Customer Payment	\$ 18.75
Monthly Company Supplement	\$ 18.75
Total Natural Gas Charges for year	\$ 1,950
Total Customer Payments	\$ 1,425
Total Customer Benefit	\$ 525

The lower the customer income, the higher the benefit they will receive under GAP.

3. *Proposed Rebilling Plan*

a) Premises with insufficient consumption history

The OES requested the Company clarify how it intends to rebill premises with insufficient consumption history data, such as for new construction. Under our proposed Rebilling Plan for this Docket, the Company will not rebill any premises that has less than one year of consumption history. We can also confirm that we have reviewed all accounts rebilled to-date in Minnesota, and have consistently applied this approach.

b) Consistent application of the Plan

Our intent with the proposed Rebilling Plan is to ensure all customers affected by the 1074 v.2 model module issue are treated consistently, regardless of their geographic location. To do this, the Company is holding all rebillings for customers meeting the following three criteria in a “queue,” that will be reviewed and worked once our proposed Rebilling Plan is approved:

- The rebilling is for a natural gas account;
- The natural gas meter on the account is Cellnet-automated; and
- The automated meter reading module is a 1074 v.2 model.

We believe this approach ensures that rebilling activities are allowed to continue on accounts that are clearly not affected by the 1074 v.2 model module malfunction issue, and that all Minnesota customers affected by this particular issue will be treated consistently under our proposed Rebilling Plan.

c) Training of Customer Service Representatives

The OES Comments recommended that we require our Customer Care staff to read the Commission-approved Rebilling Plan in its entirety, and use it when working with the affected customers. We agree with this recommendation, and will take the following steps to train our Customer Care Agents responsible for administering the Rebilling Plan:

- Communicate our management expectation that applicable customer service employees read and understand the approved plan, and to the extent they are not clear or otherwise have questions, that they express such to their supervisor;
- Develop and implement Call Center and Billing Services targeted communications, outlining key components of the approved Rebilling Plan; and
- Implement and require attendance of an online training course for all Call Center Representatives and Billing Specialists assigned to work on the rebilling of customers affected by this issue. This training module will require attendees to correctly answer specific questions relating to the implementation of the approved Rebilling Plan.

We believe that these steps will ensure that the approved Rebilling Plan is consistently applied and clearly communicated to our customers.

4. *Financial Reporting Control Compliance*

In our August 21, 2008 filing, we noted that the Company currently has one ineffective financial reporting control related to the retail revenue process, which was first identified as ineffective at the end of March 2008. At the time this was identified, we immediately established and implemented a plan to return this control to compliance, which includes weekly meetings between Accounting and other relevant business functions to track progress in reducing the number of outstanding exceptions.

We expect this control to be effective at the next SOx control assessment of September 30, 2008, which is based on our progress to-date, and the support of department management in resolving this financial control issue.

We will continue to track the progress toward full resolution, as well as conduct specific monitoring through the December 2008 SOx control assessment process to ensure that we have maintained compliance.

5. *Clarification Regarding Estimated Bills*

The OES requested the Company clarify whether some customers affected by the 1074 v.2 model module failure received estimated bills prior to being rebilled, as it appeared on a Call Center update included on pages 1-2 of Attachment K to our August 21, 2008 Response in this Docket.

No customers affected by this issue have received an estimate in advance of rebilling. The intent of the referenced communication was to convey to our Customer Service Representatives that the “dead register” condition caused by the 1074 v.2 model module failure results in an estimated billing to the customer – but should have specified that the estimated billing is provided through the Company’s cancel/rebill process at the time of rebilling.

**B. Comments of the Minnesota Office of the Attorney General**

We appreciate the OAG’s Comments and consideration of our proposed Rebilling Plan and provide below a response to the concerns that they have raised. We

additionally note that the OAG's Comments state that the Company contracted with Cellnet Technology Midwest, Inc. ("Cellnet") to design, manufacture and supply the 64,500 1074 v.2 model modules installed in Minnesota. We clarify that the Company actually contracts with Cellnet for meter reading services, and as such, Cellnet is responsible for the design and manufacture of any automated meter reading modules used to provide meter reading services for the Company.

1. *Commission Rules*

As outlined in our August 21, 2008 Filing, we believe the Commission's Rules and our natural gas tariffs provide appropriate guidance to the Company in correcting billing errors and addressing metering equipment malfunctions.<sup>1</sup> As such, we reasonably relied on them to guide our actions in response to 1074 v.2 model module malfunction.

Further, we believe the Commission's Rules governing the facts in this filing are sufficient to address the mechanics of rebilling customers in situations of this magnitude, and have proposed a Rebilling Plan consistent with these Rules. The Company proposed in our previous Filing that, although the Rules do not require us to communicate to the Commission and State Agencies when a customer is rebilled, under these circumstances such a communication should have occurred and we acknowledge that our failure to do so caused inconvenience and confusion. As outlined earlier in these Reply Comments, we look forward to working with Commission and State Agencies to outline communication expectations and processes so that we are appropriately identifying and communicating issues of interest to stakeholders. We believe that this approach will address the OAG's concern, and does not require a formal rulemaking process.

To the extent the Commission wishes to undertake a rule change, we are happy to participate, but note that any rulemaking should involve all utilities and would be forward-looking in its application.

2. *Costs Associated with Remediation of 1074 v.2 Model Modules*

To-date, the Company has not incurred direct costs for the replacement and/or other remediation of the 1074 v.2 model modules on our system. We have taken steps to protect our rights under the Agreement we have with Cellnet. We believe that these issues are covered under the contract's warranties, and that Cellnet will be responsible

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<sup>1</sup> See Minn. R. 7820.3900, subpt. 1-2 and Gas Tariff, Section No. 6, 5th Revised Sheet No. 12, § 3.7.

for all costs of replacing the 1074 v.2 model modules. As such, we are not seeking cost recovery of any of the costs related to the replacement and/or retrofit of the 1074 v.2 model modules, or any related administrative, customer service, and/or investigative costs associated with this mechanical failure.

The OAG has suggested that we seek recovery of the cost of natural gas consumed by customers during the 1074 v.2 model module failure period from Cellnet rather than rebill affected customers. While the Cellnet Agreement contains warranty provisions that provide for the replacement of failed modules, it does not directly provide for the type of relief described by the OAG, making this option unlikely. However, as our conversations with Cellnet concerning the remediation are ongoing, we are happy to update the Commission and State Agencies on the details of any resolution once this has been resolved.

We would also have a concern that such an approach could be unfair to customers unaffected by 1074 v.2 model module mechanical failure, as it would treat the customers affected by 1074 v.2 model module mechanical failure differently than we would otherwise treat a customer with a billing or meter error that needed to be rebilled. Such a disparity of treatment between classes of customers raises issues under state law.<sup>2</sup>

### *3. Cold Weather Period*

If the Company receives approval from the Commission to implement an approved Rebilling Plan in advance of the Cold Weather Rule (“CWR”) period (October 15, 2008 to April 15, 2009), we will not take action to disconnect any customers for non-payment of the rebilled amount associated with this 1074 v.2 model module failure prior to the commencement and/or during the CWR period.

The Company's proposed Rebilling Plan offers affected customers a 12-month payment arrangement period for the rebilled amount. The OAG has recommended that we suspend payments on the rebilling amount during the CWR period. We believe that it may benefit our customers to pay a lower amount over a 12-month period instead of paying a higher amount to pay off the rebilled amount over the 6 months following the 2008/09 CWR period. However, we have no objection if the Commission wishes to adopt the OAG's recommendation.

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<sup>2</sup> See Minn. Stat. §216B.03, which prohibits any rate that is “unreasonably preferential, unreasonably prejudicial or discriminatory” and directs that all rates must be “sufficient, equitable and consistent in application to a class of customers.”

**CONCLUSION**

The Company appreciates the comments of the OES and the OAG. We offer these Reply Comments, and to work closely with the State Agencies on implementation details. We respectfully request the Commission approve our proposed Rebilling Plan, as supplemented in this filing.

Dated: September 19, 2008

Northern States Power Company,  
a Minnesota corporation

RESPECTFULLY SUBMITTED,

                  /s/  
BY: \_\_\_\_\_  
      ALLEN KRUG  
      DIRECTOR, REGULATORY ADMINISTRATION

**Xcel Energy**  
**Minnesota Customer Rebillings**  
**1074 v.2 Model Module Failure Issue**

Docket No. G-002/CI-08-871  
Attachment A  
Page 1 of 3

<b>Date</b>	<b>Number of Rebills Sent</b>
25-Feb-08	1
27-Feb-08	2
1-Mar-08	0
5-Mar-08	2
6-Mar-08	4
7-Mar-08	1
10-Mar-08	7
11-Mar-08	25
12-Mar-08	29
13-Mar-08	30
14-Mar-08	24
17-Mar-08	28
18-Mar-08	15
19-Mar-08	25
20-Mar-08	12
21-Mar-08	1
27-Mar-08	2
1-Apr-08	2
4-Apr-08	1
8-Apr-08	1
9-Apr-08	1
14-Apr-08	1
15-Apr-08	1
16-Apr-08	1
21-Apr-08	5
22-Apr-08	4
23-Apr-08	3
24-Apr-08	3
25-Apr-08	6
29-Apr-08	4
2-May-08	3
5-May-08	1
6-May-08	4
7-May-08	4
8-May-08	9

**Xcel Energy**  
**Minnesota Customer Rebillings**  
**1074 v.2 Model Module Failure Issue**

Docket No. G-002/CI-08-871  
Attachment A  
Page 2 of 3

<b>Date</b>	<b>Number of Rebills Sent</b>
12-May-08	1
13-May-08	8
14-May-08	8
15-May-08	7
16-May-08	1
20-May-08	11
21-May-08	2
22-May-08	3
28-May-08	1
30-May-08	1
2-Jun-08	1
4-Jun-08	1
6-Jun-08	1
9-Jun-08	2
10-Jun-08	2
11-Jun-08	7
12-Jun-08	5
13-Jun-08	3
16-Jun-08	2
18-Jun-08	8
19-Jun-08	3
23-Jun-08	3
25-Jun-08	5
26-Jun-08	6
27-Jun-08	4
30-Jun-08	7
1-Jul-08	6
2-Jul-08	2
3-Jul-08	4
9-Jul-08	1
11-Jul-08	3
14-Jul-08	120
15-Jul-08	144
16-Jul-08	17
17-Jul-08	6

**Xcel Energy**  
**Minnesota Customer Rebillings**  
**1074 v.2 Model Module Failure Issue**

Docket No. G-002/CI-08-871  
Attachment A  
Page 3 of 3

<b>Date</b>	<b>Number of Rebills Sent</b>
18-Jul-08	26
21-Jul-08	101
22-Jul-08	115
23-Jul-08	136
24-Jul-08	97
25-Jul-08	100
28-Jul-08	118
<b>Grand Total</b>	<b>1,361</b>

Northern States Power Company, a Minnesota corporation  
and wholly owned subsidiary of Xcel Energy Inc.  
Minneapolis, Minnesota 55401

**MINNESOTA GAS RATE BOOK - MPUC NO. 2**

**LOW INCOME ENERGY DISCOUNT RIDER**

Section No. 5  
Original Sheet No. 68

**AVAILABILITY**

This Rider is available to any residential customer who is certified and receiving assistance from the Low Income Home Energy Assistance Program (LIHEAP) during the federal fiscal year ("Rider Program Year"). Further, such customers must agree to be placed on a levelized payment plan and must also agree to a payment schedule as described below to be considered a "Qualified Customer." Unless otherwise specified in this tariff, Qualified Customers on the Rider shall receive service in accordance with all terms and conditions of the standard gas service tariffs applicable to residential customers.

**RIDER DESCRIPTION**

The Rider has two components: Affordability and Arrearage Forgiveness. Xcel Energy, or an agent of Xcel Energy, will review current billing and consumption information, approved LIHEAP benefits, and household income information as submitted to Xcel Energy to determine a Qualified Customer's payment schedule amount. A Qualified Customer's payment schedule will include both payment of the customer's current month's bill (which reflects one-twelfth of the levelized payment plan) and payment of a portion of the Qualified Customer's pre-program arrears. The Rider shall meet the conditions of Minnesota Statutes, Chapter 216B.16, Subd. 15 on low-income programs.

**RATE**

Affordability Component

The Affordability component consists of a bill credit determined as one-twelfth of the difference between Xcel Energy's estimate of the Qualified Customer's annual gas bill and 6% of the Qualified Customer's household income as provided by the Qualified Customer to Xcel Energy. This bill credit is a Rider program cost that will be included in the Tracker (see definition below). Any energy assistance sums not applied to arrears will be applied to a Qualified Customer's current bill.

Arrearage Forgiveness Component

The Arrearage Forgiveness component consists of a monthly credit that will be applied each month after receipt of the Qualified Customer's payment. The credit will be designed to retire pre-program arrears over a period of up to 24 months, with the Company matching the Qualifying Customer's contribution to retiring pre-program arrears. The credit is determined by taking the pre-program arrears divided by the number of months to retire the arrears divided by two and then subtracting any energy assistance sums received by the Company on behalf of the customer divided by the number of months remaining to retire the arrears divided by two. This arrearage forgiveness credit is a Rider program cost that will be included in the Tracker.

(Continued on Sheet No. 5-69)

Date Filed: 11-09-06 By: David M. Sparby Effective Date: 02-01-08  
President and CEO of Northern States Power Company, a Minnesota corporation  
Docket No. G002/GR-06-1429 Order Date: 11-29-07

Northern States Power Company, a Minnesota corporation  
and wholly owned subsidiary of Xcel Energy Inc.  
Minneapolis, Minnesota 55401  
**MINNESOTA GAS RATE BOOK - MPUC NO. 2**

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**LOW INCOME ENERGY DISCOUNT RIDER (Continued)**

Section No. 5  
Original Sheet No. 69

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**TERMS AND CONDITIONS OF SERVICE**

1. Enrollment participation is limited to a first come first served basis until the estimated Rider program dollar cap is reached.
2. Qualified Customer must maintain an active Xcel Energy account in said customer's name at said customer's permanent primary residence to be eligible for this Rider.
3. Before the start of an enrollment period, Xcel Energy will mail information on the Rider and an application to participate in the Rider to targeted current LIHEAP customers in arrears. The application for participation must be completed in full and returned to Xcel Energy before the close of the enrollment period.
4. Qualified Customer agrees to notify Xcel Energy of any changes in address, income level, or household size. Such changes may result in removal from the Rider as they may disqualify a customer from eligibility under the provisions of the Availability section above.
5. If Qualified Customer fails to pay two consecutive monthly payments in full under the Rider, the customer will be terminated from the Rider and will be subject to Xcel Energy's regular collection practices including the possibility of disconnection.
6. Regardless of arrears balances, Xcel Energy agrees to maintain service and suspend collection activities to Qualified Customer if the customer remains current with the payment schedule.

**PROGRAM COST & COST RECOVERY**

1. A tracking mechanism ("Tracker") will be established to provide for collection of actual Rider program costs as compared to the recovery of Rider program costs through rates. Xcel Energy will track and defer Rider program costs with regulatory approval. The prudence of the Rider costs is subject to a regulatory review. The recovery of these Rider program costs through rates will begin with the implementation of final rates in Docket No. G002/GR-06-1429.
2. Rider program costs shall be recovered as a separate line item on customer billing statements for all customers receiving firm service under the following tariffs: Residential Firm Service, Commercial Firm Service, and Commercial Demand Billed Service. The initial rate is \$0.00447 per therm. Xcel Energy may petition the Commission to adjust this rate in order to true-up the Rider Program Year balance in the Tracker in its next general rate case.
3. Total Rider costs, which include start-up costs, Affordability component, Arrearage Forgiveness component, and incremental administration costs incurred by Xcel Energy, shall not exceed \$2.5 million per year. Xcel Energy shall make best efforts to limit administrative costs included in the tracker to 5% of the total Rider costs. Administrative costs will include, but are not limited to, the costs to inform customers of the Rider and costs to process and implement enrollments.

(Continued on Sheet No. 5-70)

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Date Filed:	11-09-06	By: David M. Sparby	Effective Date:	02-01-08
		President and CEO of Northern States Power Company, a Minnesota corporation		
Docket No.	G002/GR-06-1429		Order Date:	11-29-07

Northern States Power Company, a Minnesota corporation  
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Minneapolis, Minnesota 55401  
**MINNESOTA GAS RATE BOOK - MPUC NO. 2**

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**LOW INCOME ENERGY DISCOUNT RIDER (Continued)**

Section No. 5  
Original Sheet No. 70

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**EVALUATION**

1. The Rider shall be evaluated before the end of the initial four-year term and may be modified based on annual reports and on a financial evaluation.
2. The annual reports will include the effect of the rider on customer payment frequency, payment amount, arrearage level, number of customers in arrears, service disconnections, retention rates, customer complaints, and utility customer collection activity. The annual reports may also include information about customer satisfaction with the rider.
3. The financial evaluation will include a discounted cash flow of the Rider's cost-effectiveness analysis from a ratepayer perspective comparing the 1) total Rider costs, which includes the Affordability component, Arrearage Forgiveness component, and total Company incurred administration costs, to 2) the total net savings including cost reductions on utility functions such as the impact of the Rider on write-offs, service disconnections and reconnections, and collections activities. The discounted cash flow difference between total Rider costs and total net savings will result in either a net benefit of a net cost to ratepayers for the rider. Any net benefit after the initial four-year term of the Rider will be added to the Tracker for refund to ratepayers.

**REVOCATION**

The Rider, upon approval by the Commission, is effective unless the Commission, after notice and hearing, rescinds or amends its order approving the Rider.

**TERM**

The Rider shall become effective on February 1, 2008 and shall have an initial four-year term ending on January 31, 2021. The first annual report shall be due on January 31, 2009 and will continue each year thereafter, ending on January 31, 2013.

**APPLICABILITY**

Unless otherwise specified in this tariff, Qualified Customers in the Rider shall receive service in accordance with all terms and conditions of the standard gas service tariffs applicable to Residential customers.

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Date Filed:	11-09-06	By: David M. Sparby	Effective Date:	02-01-08
		President and CEO of Northern States Power Company, a Minnesota corporation		
Docket No.	G002/GR-06-1429		Order Date:	11-29-07

**CERTIFICATE OF SERVICE**

I, Carole A. Wallace, hereby certify that I have this day served copies of the foregoing document on the attached list of persons by e-filing, delivery by hand or by causing to be placed in the U.S. mail at Minneapolis, Minnesota.

**Docket No. G-002/CI-08-871**

Dated this 19th day of September 2008

/s/

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Carole A. Wallace

Investigation into Northern States Power for  
Inaccurate Gas Meters, Recalculation of Bills  
and Related Issues.

G002/CI-08-871  
9-10-2008

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