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RECEIVED

AUG 17 2009

PUBLIC SERVICE COMMISSION

August 14, 2009

VIA E-FILING

Burl W. Haar, Executive Secretary
 Minnesota Public Utilities Commission
 350 Metro Square Building
 121 Seventh Place East
 St. Paul, MN 55101

**RE: Reply Comments of the Suburban Rate Authority
 Docket No. G-002/CI-08-871**

Dear Dr. Haar:

The SRA agrees with the comments of the Minnesota Office of Energy Security that the Company is taking an appropriate step in filing the Petition to Withdraw given the circumstances the Company describes. In paragraph 2 of the OES Comments, it recommends that the Commission require Xcel to file a report summarizing the outcome of the dispute resolution process between Xcel and responsible third parties, including Xcel's proposed disposition of any proceeds. (OES comments p. 3). The OES also observes that the proposal to withdraw rebilling and refunding customers already billed, may affect the Company's original proposal to credit ratepayers with some or all of the realized proceeds. Id.

It is the SRA's understanding that if Company's Petition to Withdraw is accepted, together with Xcel's previous commitment not to seek ratepayer recovery for Xcel's costs related to the faulty gas meter modules, ratepayers will not be held responsible, directly or indirectly, for the consequences of the faulty modules. Moreover, under the Petition to Withdraw, unbilled gas use billing and refund previous billing will result in affected customers receiving gas for which they will not be billed.

Burl W. Haar, Executive Secretary

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Notwithstanding the above result, a report to the Commission as recommended by OES would be helpful. At that time, the Commission could evaluate whether all, some or none of the proceeds are appropriately credited to ratepayers.

Respectfully submitted,

KENNEDY & GRAVEN, CHARTERED

/s/ James Strommen

James M. Strommen

JMS:mmh

cc: All persons on the attached Service List

In the matter of an Investigation into Northern States Power Company d/b/a Xcel
Energy Inaccurate Gas Meters, Recalculation of Bills, and Related Issues

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

Service List as of September 2008

<p>Dr. Burl W. Haar Executive Secretary Minnesota Public Utilities Commission 121 Seventh Place East St. Paul, MN 55101</p>	<p>John Lindell OAG-RUD 900 BRM Tower 445 Minnesota Street St. Paul, MN 55101</p>
<p>Sharon Ferguson MN Department of Commerce Suite 500 85 - 7th Place East St. Paul, MN 55101-2198</p>	<p>Ronald M. Giteck Office of the Attorney General Residential Utilities Division 445 Minnesota Street 900 BRM Tower St. Paul, MN 55101</p>
<p>Christopher Anderson Minnesota Power 30 West Superior Street Duluth, MN 55802-2093</p>	<p>Donald R. Ball Great Plains Natural Gas Co. 400 North Fourth Street Bismarck, ND 58501</p>
<p>James J. Bertrand Leonard Street & Deinard Suite 2300 150 South Fifth Street Minneapolis, MN 55402</p>	<p>William A. Blazar MN Chamber of Commerce Suite 1500 400 Robert Street North St. Paul, MN 55101</p>
<p>Bill Bullard South Dakota PUC Capitol Building Pierre, SD 57501-5070</p>	<p>Jeffrey A. Daugherty CenterPoint Energy/Minnegasco 800 LaSalle Avenue, Fl. 11 PO Box 59038 Minneapolis, MN 55459-0038</p>
<p>Steven Bosacker City of Minneapolis City Hall, Rm. 310M 350 South Fifth Street Minneapolis, MN 55415-1376</p>	<p>Michael J. Bradley Moss & Barnett 4800 Wells Fargo Center 90 South Seventh Street Minneapolis, MN 55402-4129</p>

<p>Aakash Chandarana Briggs & Morgan 2200 IDS Center 80 South 8th Street Minneapolis, MN 55402</p>	<p>Darrell Nitschke, Executive Director North Dakota Public Service Comm. Dept. 408 600 E. Boulevard Avenue Bismarck, ND 58505-0480</p>
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AFFIDAVIT OF SERVICE BY MAIL AND EMAIL

Our File No. SU160-84

**RE: In the Matter of the Petition of
Northern States Power Company
d/b/a Xcel Energy, for Approval of
Modifications to the Service Rules of
the Company's Natural Gas and Electric Tariffs**

Michelle Hyatt, after being first duly sworn, deposes and says that on the 14th day of August, 2009, she served the attached letter to Burl W.Haar to all persons on the attached Service List by placing a copy of said document in an envelope, addressed to the above addresses, and depositing them in the United States Mail at Minneapolis, Minnesota, and emailing the same to the email addresses on the attached list.

/s/ Michelle Hyatt
Michelle Hyatt

SUBSCRIBED AND SWORN to before me
this 14th day of August, 2009.

/s/ Toni Decker
Notary Public