



2302 Great Northern Drive  
P O Box 2747  
Fargo, ND 58108-2747

April 27, 2015

**--Via Electronic Filing and Federal Express--**

Darrell Nitschke, Executive Secretary  
North Dakota Public Service Commission, Dept. 0408  
600 East Boulevard  
Bismarck, ND 58505-0480

**Re: Compliance Filing – Jurisdictional Allocation Study  
Case No. PU-12-813**

Dear Mr. Nitschke:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Jurisdictional Allocation Study as required under the provisions of the Rate Settlement in Case No. PU-12-813. In addition to an electronic filing via email, we are sending ten (10) copies of the report to the Commission through overnight delivery.

In its February 26, 2014 Order Adopting Settlement, the Commission directed the Company to work with their Staff and an independent third party to study various jurisdictional demand allocation methodologies that have been, or may be, considered for application in North Dakota ratemaking and submit a report to the Commission. The enclosed Study report was developed by the Brattle Group using actual and forecasted Xcel Energy data and modeling performed by the Company.

To correct the record, our February 11, 2015 extension letter implied that Minnesota Commission staff was in attendance at a June 24, 2014 presentation to explain the planned approach for this study. They were not; another Minnesota regulatory agency, the Minnesota Department of Commerce, was contacted but unable to attend the meeting that day. Both the Minnesota Commission Staff and Department of Commerce staff are interested in the study and we will be meeting with them soon to review this report.

If you have any questions concerning the report or the Study process, feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'David H. Sederquist'.

DAVID H. SEDERQUIST  
SENIOR REGULATORY AND FINANCE CONSULTANT  
(701) 241-8632 or dave.sederquist@xcelenergy.com

Enclosures

228 PU-12-813 Filed 04/27/2015 Pages: 70  
Compliance filing - jurisdictional allocation study update  
Northern States Power Company  
David Sederquist