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**VIA EMAIL AND FEDERAL EXPRESS**

July 15, 2017

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

RE: APPLICATION FOR CONSIDERATION OF A RESOURCE TREATMENT  
FRAMEWORK TO ADDRESS JURISDICTIONAL COST ALLOCATION ISSUES  
CASE NOS. PU-12-813, PU-13-706, PU-13-707, PU-13-708, PU-13-742,  
PU-13-743, PU-13-194, PU-13-195  
OAH FILE NO. 20170091

Dear Mr. Nitschke:

Northern States Power Company, doing business as Xcel Energy, respectfully submits the following Direct Testimony in support of the Company's Application in the above-referenced Cases:

- Policy Testimony of Aakash Chandarana;
- RTF Implementation Structures Testimony of Rick Starkweather;
- Costs of Legal Separation, Implementation of Pseudo Separation, and Jurisdictional Allocation of Karen Everson;
- Resource Planning Testimony of Philip Joseph ("P.J.") Martin;
- Transmission Testimony of Steven Beuning;
- Revenue Requirements of Charles Burdick; and
- Verifications for the testimonies of the same.

The Direct Testimony of Company Witness Mr. Steven Beuning contains trade secret information. This information is that same as the information provided in response to Advocacy Staff data requests; the Company therefore submits this information consistent with its Application for Trade Secret Protection currently pending in the above referenced Cases. In accordance with Section 69-02-09-02

172 PU-13-742 Filed: 7/15/2017 Pages: 445  
Prefiled Direct Testimony of Aakash Chandarana

184 PU-13-743 Filed: 7/15/2017 Pages: 445  
Prefiled Direct Testimony of Aakash Chandarana

168 PU-13-708 Filed: 7/15/2017 Pages: 445  
Prefiled Direct Testimony of Aakash Chandarana

169 PU-13-707 Filed: 7/15/2017 Pages: 445  
Prefiled Direct Testimony of Aakash Chandarana

169 PU-13-706 Filed: 7/15/2017 Pages: 445  
Prefiled Direct Testimony of Aakash Chandarana

321 PU-12-813 Filed: 7/15/2017 Pages: 445  
Prefiled Direct Testimony of Aakash Chandarana

173 PU-13-194 Filed: 7/15/2017 Pages: 445  
Prefiled Direct Testimony of Aakash Chandarana

190 PU-13-195 Filed: 7/15/2017 Pages: 445  
Prefiled Direct Testimony of Aakash Chandarana

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of the North Dakota Administrative Code, a single copy of the trade secret version of the testimony is being provided in a sealed envelope marked **PROTECTED INFORMATION – PRIVATE**.

An original and ten (10) copies of the public versions of our Direct Testimony and Verifications are being provided, along with a CD containing the public version of the Direct Testimonies and Verifications.

Please feel free to contact me at (701) 241-8632 or [dave.sederquist@xcelenergy.com](mailto:dave.sederquist@xcelenergy.com) should you have any questions.

Sincerely,



DAVID H. SEDERQUIST  
Sr. Consultant, Regulation & Finance

Enclosures

cc: Via Email – Public Version Only:  
S. Cardwell  
P. Fahn  
I. Jeffcoat-Sacco  
J. Lein  
V. Shock  
J. Schuh  
ALJ Dawson

Via Email – Trade Secret Version:  
Jim Heidell