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December 8, 2017

— VIA E-MAIL & FEDERAL EXPRESS —

Darrell Nitschke
Executive Secretary
North Dakota Public Service Commission
State Capitol Building
600 East Boulevard, Dept. 408
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 (the “Company” or “Xcel Energy”) submits an original and ten (10) copies of our rebuttal testimony in the above-referenced case.

The following rebuttal testimony is being filed:

- Policy – Aakash Chandarana
- Implementation Structures – Richard Starkweather
- Resource Planning – Philip Joseph “P.J.” Martin

Please contact me if you have any questions regarding this filing at david.sedquist@xcelenergy.com or 701-241-8632.

194 PU-13-742 Filed 12/08/2017 Pages: 20
 Prefiled Rebuttal Testimony of Philip Joseph "P.J." Martin

190 PU-13-708 Filed 12/08/2017 Pages: 20
 Prefiled Rebuttal Testimony of Philip Joseph "P.J." Martin

191 PU-13-707 Filed 12/08/2017 Pages: 20
 Prefiled Rebuttal Testimony of Philip Joseph "P.J." Martin

191 PU-13-706 Filed 12/08/2017 Pages: 20
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350 PU-12-813 Filed 12/08/2017 Pages: 20
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195 PU-13-194 Filed 12/08/2017 Pages: 20
 Prefiled Rebuttal Testimony of Philip Joseph "P.J." Martin

206 PU-13-743 Filed 12/08/2017 Pages: 20
 Prefiled Rebuttal Testimony of Philip Joseph "P.J." Martin

212 PU-13-195 Filed 12/08/2017 Pages: 20
 Prefiled Rebuttal Testimony of Philip Joseph "P.J." Martin
 Northern States Power Company
 David Sederquist

Darrell Nitschke
December 8, 2017
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Sincerely,



David H. Sederquist
Sr. Consultant, Regulation & Finance
Northern States Power Company

Enclosures

cc: Via Email:
S. Cardwell
P. Fahn
I. Jeffcoat-Sacco
J. Lein
J. Schuh
ALJ Dawson
Jim Heidell

REBUTTAL TESTIMONY
PHILIP JOSEPH "P.J." MARTIN

Before the North Dakota Public Service Commission
State of North Dakota

In the Matter of Northern States Power Company,
a Minnesota Corporation d/b/a Xcel Energy
Jurisdictional Cost Allocation Matters

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

Rebuttal Resource Planning
Exhibit__ (PJM-2)

December 8, 2017

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1 **I. INTRODUCTION**

2
3 Q. PLEASE STATE YOUR NAME AND TITLE.

4 A. My name is Philip Joseph “P.J.” Martin. I am the Director, Resource
5 Planning, for Northern States Power Company (NSP or Xcel Energy or the
6 Company). The Company provides electric service to customers in
7 Minnesota, North Dakota, and South Dakota (collectively the NSPM States).
8 The Company’s affiliate, Northern States Power, a Wisconsin corporation
9 (NSPW), provides electric service to customers in Wisconsin and Michigan.
10 The Company and NSPW, together under the Interchange Agreement, own
11 and operate the five-state integrated NSP System.

12
13 Q. ARE YOU THE SAME P.J. MARTIN WHO SUBMITTED PRE-FILED DIRECT
14 TESTIMONY IN THIS PROCEEDING?

15 A. Yes.

16
17 Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

18 A. The purpose of my Rebuttal Testimony is to explain and support the
19 Company’s additional resource planning modeling that was performed to
20 assess the impacts of various structural alternatives presented as part of our
21 RTF to both North Dakota and the rest of the NSPM States.

22
23 Q. HOW IS YOUR TESTIMONY ORGANIZED?

24 A. My Testimony is organized as follows:

- 25 • Section II provides a description of the assumptions and scenarios
26 included in the Company’s modeling.

- Section III presents the results of the modeling of the different separation alternatives.
- Section IV sets forth my conclusions and recommendations.

II. MODELING ASSUMPTIONS AND SCENARIOS

Q. PLEASE PROVIDE A BRIEF SUMMARY OF THE ADDITIONAL MODELING PERFORMED BY THE COMPANY.

A. Resource Planning performed additional modeling to assess the impacts of various structural alternatives to both North Dakota and the rest of the NSPM States. The modeling evaluates the Present Value of Revenue Requirement (PVR) of four different scenarios for allocation between North Dakota and the rest of the NSPM States of both the Disputed Resources and the 1,850 MW of planned wind additions.

Q. WHAT IS THE PURPOSE OF THE ADDITIONAL MODELING?

A. The analysis was conducted in order to ascertain the cost impact of reallocating certain Disputed Resources to the rest of the NSPM States and to identify whether those costs could be equitably offset by additional cost savings that would be generated by allocating all of the projects identified in Case Nos. PU-17-120 and PU 17-372, which total approximately 1,850 MW (nameplate) of wind additions to the non-North Dakota NSPM participants.

Q. WHAT ARE THE DISPUTED RESOURCES THAT WERE INCLUDED IN THE ADDITIONAL MODELING?

A. As I discussed in more detail in my Direct Testimony, the Disputed Resources include a number of generation resources serving the NSP System

1 for which the Company is either not fully recovering its costs or is
2 recovering its costs subject to refund as a result of past resource selection
3 disagreements. In general, these include certain CBED and smaller solar
4 resources, six biomass PPAs currently serving the NSP System, the two
5 PPAs that emerged from the 187 MW solar portfolio additions, and the
6 Mankato Energy Center expansion (MEC II) project PPA. The Disputed
7 Resources are listed on Schedule 3 to the RTF Application, and are
8 identified in Table 1 below.

9
10 Q. WHAT ASSUMPTIONS WERE USED IN THE ADDITIONAL MODELING?

11 A. The assumptions used in the present analysis are essentially the same as
12 those used in our Strategist modeling discussed in my July 15, 2017 Direct
13 Testimony and attached thereto as Schedule 2. Those assumptions were
14 updated from the assumptions used in the original RTF application to reflect
15 the continued reductions in the cost of wind generation and lower natural
16 gas price forecasts. Likewise, the assumptions used for the present analysis
17 have been updated slightly to include the addition of the 300 MW Dakota
18 Range wind project and revised biomass costs in some scenarios.

19
20 Q. WHAT ARE THE FOUR DIFFERENT SCENARIOS MODELED BY THE COMPANY?

21 A. The Company modeled four different scenarios (3A to 3D) to provide
22 insights into the PVRR impacts of different resource allocation options
23 available to resolve the current RTF issues in North Dakota. Under all
24 scenarios it is assumed that:

- 25 • Legal or Pseudo-separation will occur so jurisdictional planning will apply
26 for all future resource decisions;

- 1 • For all existing resources, if North Dakota does not participate in the
2 resource, North Dakota will pay for energy replacement of that resource
3 at the assumed MISO market energy price, which simulates the
4 methodologies underlying the Pseudo Separation concept resource
5 allocation methodologies; and
- 6 • North Dakota future capacity needs are met with either market capacity
7 purchases or 115 MW nameplate combustion turbine (CT) additions
8 when needs become great enough, which is an assumption regarding
9 separate jurisdictional planning consistent with the analysis in our direct
10 case. When analyzing the various scenarios, by holding this assumption
11 constant we can measure the value of other resources. Below is an
12 overview of each scenario:

13 **3A. Current Legacy Purchase/Sale with Jurisdictional Future**

14 Assumes North Dakota fully participates in sharing the costs of all
15 legacy system resources and does not participate in the new 1,850
16 MW of wind.

17

18 **3B. Current with Legacy Purchase/Sale and Jurisdictional Future,
19 Restack Solar, CBED, Biomass**

20 Assumes North Dakota does not participate in sharing the costs of
21 solar, CBED and biomass, and does not participate in the new 1,850
22 MW of wind.

23

24 **3C. Current with Legacy Purchase/Sale and Jurisdictional Future,
25 Share 1,850MW Wind**

26 Assumes North Dakota fully participates in sharing the costs of all
27 legacy system resources and fully participates in the new 1,850 MW of
28 wind.

29

30 **3D. Current with Legacy Purchase/Sale and Jurisdictional Future,
31 Restack Solar, CBED, Biomass, MEC II**

32 Assumes North Dakota does not participate in sharing the costs of
33 solar, CBED, biomass, and MEC II, and does not participate in the
34 new 1,850 MW of wind.

1 Q. PLEASE DETAIL WHICH RESOURCES ARE INCLUDED IN EACH SCENARIO.
 2 A. Below is a summary showing which Disputed Resources are included in each
 3 of the four different separation scenarios that were analyzed by the
 4 Company. A “Y”, or yes, indicates that North Dakota shares in all costs
 5 associated with the resource; whereas a “N”, or no, indicates that North
 6 Dakota does not share in all costs associated with the resource.

7
 8 **Table 1: Resource by Resource Allocation Modeling Scenario**

<u>Resource Name</u>	<u>Type</u>	<u>3A</u>	<u>3B</u>	<u>3C</u>	<u>3D</u>
Jeffers Wind	CBED Wind	Y	N	Y	N
Big Blue	CBED Wind	Y	N	Y	N
Community Wind South (Zephyr)	CBED Wind	Y	N	Y	N
Ridgewind Power Partners	CBED Wind	Y	N	Y	N
Adams Wind Generation	CBED Wind	Y	N	Y	N
Danielson Wind Farm	CBED Wind	Y	N	Y	N
Ewington Energy Systems	CBED Wind	Y	N	Y	N
Grant County Wind	CBED Wind	Y	N	Y	N
North Community Turbines	CBED Wind	Y	N	Y	N
Valley View Transmission	CBED Wind	Y	N	Y	N
Uilk Wind Farm	CBED Wind	Y	N	Y	N
Hilltop Power	CBED Wind	Y	N	Y	N
Winona County Wind	CBED Wind	Y	N	Y	N
Woodstock Municipal Wind	CBED Wind	Y	N	Y	N
Outland/Slayton Solar	Small Solar	Y	N	Y	N
Best Power (St. Johns)	Small Solar	Y	N	Y	N
Solar Gardens / Solar Rewards	Small Solar	N	N	N	N
Koda Energy	Biomass	Y	N	Y	N
WM Renewable Energy/MN Methane	Biomass	Y	N	Y	N
Pine Bend	Biomass	Y	N	Y	N
FibroMinn	Biomass	Y	N	Y	N
Laurentian Energy Authority	Biomass	Y	N	Y	N
St. Paul Cogen	Biomass	Y	N	Y	N
Marshall Solar	187 Solar	Y	N	Y	N
NorthStar Solar	187 Solar	Y	N	Y	N
Calpine MEC 2	CAPCON	Y	Y	Y	N

1
2 **III. MODELING RESULTS**
3

4 Q. PLEASE SUMMARIZE THE RESULTS OF THE ADDITIONAL MODELING.

5 A. Xcel Energy’s analysis demonstrates that it would be equitable to both
6 North Dakota and the rest of the NSPM States to allocate North Dakota’s
7 share of the Disputed Resource costs to the rest of the NSPM States if those
8 states were also allotted North Dakota’s share of the costs and benefits of
9 the proposed 1,850 MW in wind additions. This proposed scenario presents
10 the least impactful outcome to both North Dakota and the rest of the
11 NSPM States.

12
13 Q. WHAT ANALYSIS DID THE COMPANY CONDUCT TO REACH THIS CONCLUSION?

14 A. Resource Planning first modeled the PVRR of the four scenarios using
15 Strategist. Then, by comparing the scenarios against each other, it was
16 possible to determine the PVRR impact of reallocating specific resources
17 among North Dakota and the rest of the NSPM States. Finally, we
18 identified the proposal that best matched the costs and benefits to both
19 North Dakota and the rest of the NSPM States. I will discuss each step in
20 my testimony below.

1 Q. WHAT WERE THE RESULTS OF THE PVRR ANALYSIS FOR THE FOUR
2 SCENARIOS?

3 A. The modeling of the four different scenarios yielded the following PVRR
4 results:

6 **Table 2: PVRR of Resource Allocation Scenarios**

#	PVRR, \$M	MN/SD	ND
3A	Current with Legacy Purchase/Sale and Jur Future	45,004	2,369
3B	Current with Legacy Purchase/Sale and Jur Future, Restack Solar, CBED, Biomass	45,052	2,328
3C	Current with Legacy Purchase/Sale and Jur Future, Share 1850MW wind	45,084	2,283
3D	Current with Legacy Purchase/Sale and Jur Future, Restack Solar, CBED, Biomass, MEC2	45,072	2,314

11 Q. WHAT DO THESE RESULTS DEMONSTRATE?

12 A. These results, alone, do not lead to specific conclusions. Rather, the
13 differences in PVRR among the scenarios show the costs and benefits of
14 sharing various resources. When comparing the relative PVRR differences,
15 or deltas, in costs between the scenarios, it is possible to isolate the impacts
16 of some of the different resource treatment options. Table 3 below shows
17 the PVRR deltas of the different options against the base scenario (3A). As
18 shown, all of the options reduce PVRR costs for North Dakota while
19 increasing PVRR costs for the remainder of the NSPM States. In addition,
20 sharing the new wind resources with North Dakota also results in reduced
21 PVRR costs for North Dakota and increased costs for the rest of the NSPM
22 States.

23 **Table 3: PVRR Value of RTF Options**

PVRR Deltas, \$M	MN/SD	ND
Value of Restacking Solar, CBED, Biomass (3B-3A)	48	-42
Value of Restacking Solar, CBED, Biomass, MEC2 (3D-3A)	68	-55
Value of Restacking MEC2 (3D-3B)	20	-14
Value of Sharing All Wind (3C-3A)	80	-86

1
2 Q. WHY ARE THE VALUES IN TABLE 3 NOT SYMMETRICAL?

3 A. As mentioned previously, the analysis assumes North Dakota future capacity
4 needs will be met with either market capacity purchases or 115 MW CT
5 additions when needs become great enough, which is an assumption
6 regarding separate jurisdictional planning consistent with the analysis in our
7 direct case. Below are two summary tables showing CT additions and
8 market capacity purchase assumptions by scenario.
9

10 **Table 4: ND CT Addition Timing by Scenario**

Scenario 3A	Scenario 3B	Scenario 3C	Scenario 3D
2031	2030	2031	2030
2035	2035	2035	2035
2041	2040	2041	2040
2051	2051	2051	2051

11
12
13
14
15
16 **Table 5: ND Market Capacity Purchases by Scenario (MW)**

	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2048	2049	2050
3A	30	48	50	54	0	6	10	42	0	0	1	32	50	53	22	49	52
3B	37	54	55	0	0	10	15	47	0	0	5	36	54	0	22	49	52
3C	14	32	34	37	0	0	0	26	0	0	0	16	34	37	22	49	52
3D	52	69	71	0	11	26	30	62	9	14	21	52	54	0	22	49	52

17
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19
20
21 The values in Table 3 are not symmetrical because the analysis incorporates
22 jurisdictional planning and each of the scenarios creates different expansion
23 plans and capacity needs for both North Dakota and the remainder of the
24 system. The PVRR deltas reflect not only the shifting of costs associated
25 with the reallocation of the Disputed Resources and the wind resources, but
26 also the varying capacity costs due to different size and/or timing of CT

1 additions or market capacity purchases that result from the different
2 resource treatment options in each of the four scenarios.

3
4 Q. WHY IS IT REASONABLE TO ASSUME INDEPENDENT JURISDICTIONAL
5 PLANNING WHEN THE COMPANY NOW IS PROPOSING A PRESUMPTION OF
6 INTEGRATION FOR FUTURE RESOURCE PLANNING PURPOSES?

7 A. The Company's initial RTF proposals contemplated completely separate
8 jurisdictional planning. The analysis conducted for rebuttal testimony held
9 that assumption constant to provide a better basis for comparison. It would
10 also be difficult to model the results of a presumption of integration due to
11 the uncertainty regarding the timing and type of future resource additions
12 and in which resources North Dakota might decide to participate.

13
14 Q. THE WIND PROJECTS ARE NOT DISPUTED RESOURCES. WHY DID THE
15 COMPANY MODEL SCENARIOS WHERE WIND IS NOT SHARED WITH NORTH
16 DAKOTA?

17 A. To reduce the negative impact of a potential resolution of the Disputed
18 Resources on the rest of the NSPM States, the Company assessed the
19 relative impacts of different options to utilize the wind to mitigate the effect
20 of implementing the Commission's decisions regarding the Disputed
21 Resources by recovering their costs in the other NSPM States. This would
22 create a more equitable financial impact to the remainder of the NSPM
23 States. Company Witness Mr. Chandarana discusses the policy reasons for
24 allocating all of the benefits of the proposed wind additions to the rest of the
25 NSPM States to offset the additional costs of allocating North Dakota's
26 share of the Disputed Resources to those states in his rebuttal testimony.

1 Table 6 below provides insight into the different options for resolving the
2 Disputed Resource issues in the RTF and allocating the new wind.

3
4 **Table 6: Value of Disputed Resource Reallocation and**
5 **Wind Sharing Options**

PVRR Deltas, \$M	MN/SD	ND
Value of Sharing All Wind vs. Restacking Solar, CBED, Biomass (3C-3B)	32	-45
Value of Sharing All Wind vs. Restacking Solar, CBED, Biomass, MEC2 (3C-3D)	12	-31

6
7
8
9
10 Q. WHAT DO THE RESULTS OF THIS ANALYSIS SHOW?

11 A. Based on the results, the Value of Sharing All Wind vs. Allocating all Solar,
12 CBED, Biomass, MEC II (3C-3D) appears to offer the most equitable
13 solution as the PVRRs for both North Dakota and the remainder of the
14 NSPM States are closest to zero. In this case, North Dakota's PVRR cost
15 would increase by approximately \$31 million over the 37-year planning
16 period because it would not benefit from the savings afforded by
17 participating in the new 1,850 MW of wind. However, the lost opportunity
18 cost of not participating in new wind would be largely offset by the fact that
19 North Dakota would not fully participate in any of the Disputed Resources.
20 The remainder of the NSPM States would experience a \$12 million decrease
21 in PVRR over the planning period as they would benefit from absorbing
22 North Dakota's share of the savings from the 1,850 MW of wind. Yet this
23 benefit is almost fully offset by the incremental costs of paying for the North
24 Dakota portion of the Disputed Resources for the net impact of \$12 million
25 in PVRR savings.

1 Q. WHY DOES THIS PROPOSAL REPRESENT THE MOST EQUITABLE SOLUTION TO
2 THE ISSUES PRESENTED IN THE RTF?

3 A. North Dakota would immediately benefit from removing the Disputed
4 Resources from its cost base but would forego participation in the lower
5 cost of the 1,850 MW in added wind resources in order to offset the cost to
6 the rest of the NSPM States of taking on North Dakota's share of disputed
7 resource costs. This presents the most equitable option to effectuate the
8 Commission's decisions regarding the Disputed Resources while ensuring
9 that the remainder of the NSPM States are not materially harmed as a result
10 of the Disputed Resource reallocation.

11

12 Q. WHAT WOULD BE THE ANNUAL EFFECT ON COSTS OF NORTH DAKOTA NOT
13 PARTICIPATING IN ANY DISPUTED RESOURCES OR WIND ADDITIONS?

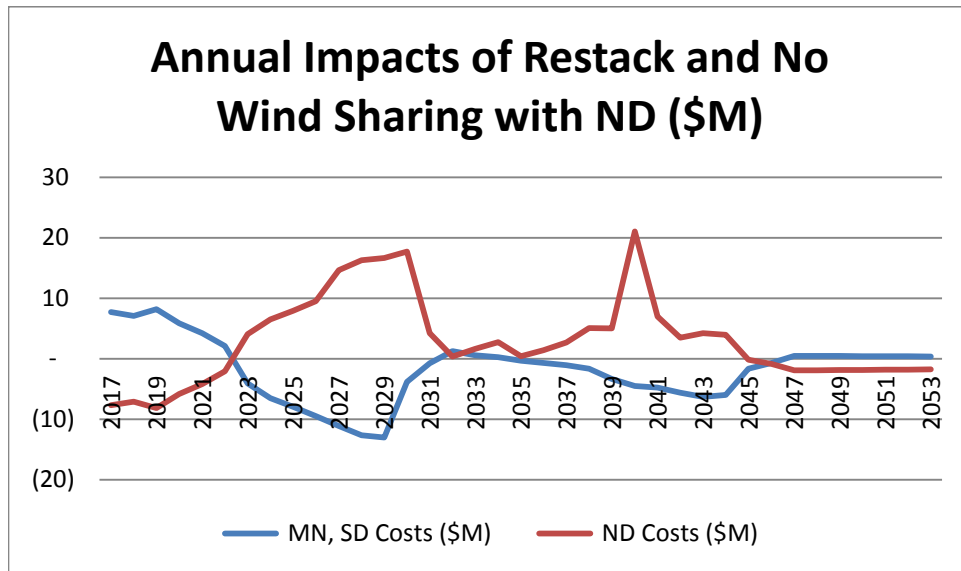
14 A. Figure 1 below shows the annual PVRR impacts of the scenario highlighted
15 above in which North Dakota does not participate in any of the Disputed
16 Resources or any of the new wind. As shown, the reallocation of Disputed
17 Resources and no North Dakota participation in any wind results in a range
18 of annual cost impacts. Negative values in this figure represent savings while
19 positive values represent costs.

20

21 North Dakota is projected to see immediate savings from avoiding disputed
22 resource costs and costs associated with the new wind before the benefits of
23 the production tax credits (PTCs) begin to accrue. After about 2023,
24 however, the benefits of the wind PTCs become apparent and begin to
25 offset the avoided costs of not participating in the Disputed Resources
26 resulting in a period of increased net costs for North Dakota. As the PTC
27 benefits end for the new wind projects around 2030, North Dakota net cost

1 impacts associated with not participating in the wind drop significantly.
2 However, North Dakota is still expected to see marginal negative cost
3 impacts from not participating in the low cost 1,850 MW of wind until the
4 wind resources expire or retire in the mid-2040s.

6 **Figure 1: Annual Cost Impacts of Proposed Solution**



17

18 Q. ARE THERE OTHER FACTORS TO CONSIDER AS WELL?

19 A. Yes. In addition to the immediate savings that North Dakota customers will
20 experience, allocating the wind projects to the other NSPM States will also
21 shift the associated development, tax law, and production risks to those
22 states. This is in light of the known and guaranteed immediate savings that
23 North Dakota customers will enjoy.

24

1 Q. PLEASE EXPLAIN THE PRONOUNCED PEAKS IN PVRR COSTS TO NORTH
2 DAKOTA IN 2030 AND 2040 IN FIGURE 1.

3 A. The assumptions made around jurisdictional planning are major drivers in
4 the spikes for North Dakota in Figure 1. Scenario 3C assumes 115 MW
5 nameplate CT additions in 2031 and 2041; whereas Scenario 3D assumes
6 115 MW nameplate CT additions in 2030 and 2040. In 3D, North Dakota
7 does not participate in the wind or the Disputed Resources and this results
8 in North Dakota having to add CT capacity one year earlier relative to
9 Scenario 3C. This one-year shift in capacity needs creates a spike in costs for
10 North Dakota in both 2030 and 2040 which are reflected in Figure 1. The
11 spikes are therefore driven by the expansion plan assumptions made in the
12 modeling and not by any specific cost impacts from the allocation of the
13 Disputed Resources or the new wind. Tables 4 and 5 above provide an
14 overview of the CT additions and market capacity purchases assumed in the
15 four scenarios.

16

17 Q. WOULD NORTH DAKOTA'S PARTICIPATION IN NEW SYSTEM WIDE RESOURCE
18 ADDITIONS AFFECT ITS ANNUAL IMPACTS PROJECTIONS IN FIGURE 1 AND THE
19 PVRRS IN TABLE 6?

20 A. Yes. Although the results would be difficult to model at this time;
21 intuitively, if North Dakota chooses to participate in resource additions as
22 part of the overall NSP System, the need for independent resource additions
23 solely for North Dakota would, at the very least, be delayed. This would
24 likely smooth out and/or push into the future the spikes associated with the
25 capital investment in a new North Dakota specific resource. It is my
26 opinion that utilizing a presumption of integration in a forward-looking
27 North Dakota resource planning process would smooth out the spikes in

1 Figure 1 and the PVRR impacts to North Dakota in Table 6 would likely be
2 reduced.

3 4 **IV. CONCLUSION**

5
6 Q. PLEASE SUMMARIZE YOUR CONCLUSIONS REGARDING THE ADDITIONAL
7 RESOURCE PLANNING ANALYSIS CONDUCTED BY THE COMPANY.

8 A. The most equitable solution for addressing Disputed Resources appears to
9 be a scenario in which North Dakota is not allocated any of the new 1,850
10 MW of wind, which helps offset the impact of shifting the state's share of
11 the costs of the Disputed Resources to the rest of the NSPM States.

12
13 Q. DOES THIS CONCLUDE YOUR PRE-FILED REBUTTAL TESTIMONY?

14 A. Yes, it does.

**STATE OF NORTH DAKOTA
BEFORE THE
NORTH DAKOTA PUBLIC SERVICE COMMISSION**

Northern States Power Company 2013 Electric Rate Increase Application	Case No. PU-12-813
Northern States Power Company Advanced Determination of Prudence – Courtenay Wind Application	Case No. PU-13-706
Northern States Power Company Advanced Determination of Prudence – Odell Wind Application	Case No. PU-13-707
Northern States Power Company Advanced Determination of Prudence – Pleasant Valley Application	Case No. PU-13-708
Northern States Power Company Advanced Determination of Prudence – Border Winds Application	Case No. PU-13-742
Northern States Power Company 150 MW Border Winds Project – Rolette County, ND Public Convenience & Necessity	Case No. PU-13-743
Northern States Power Company Advanced Determination of Prudence – NG Generators Application	Case No. PU-13-194
Northern States Power Company Red River Valley NG Unites 1&2 – Hankinson, ND Public Convenience & Necessity	Case No. PU-13-195

