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April 29, 2015

- Via Email and Federal Express -

Darrell Nitschke, Executive Secretary
North Dakota Public Service Commission
State Capitol Building, Dept 408
600 East Boulevard
Bismarck, ND 59505-0480

RE: NORTHERN STATES POWER COMPANY REQUEST FOR APPROVAL OF AN
ADVANCE DETERMINATION OF PRUDENCE FOR A 187 MW SOLAR
PORTFOLIO
CASE NO. PU-14-810

Dear Mr. Nitschke:

Northern States Power Company, doing business as Xcel Energy, respectfully submits to the North Dakota Public Service Commission the attached correction to the Rebuttal Testimony and Schedules filed on April 17, 2015 in the above-referenced matter.

An original and nine copies of the corrected page of the Rebuttal Testimony of Kurtis Haeger are being provided via Federal Express.

Please contact me if you have any questions regarding this filing.

Sincerely,

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

DAVID H. SEDERQUIST
Sr. Consultant, Regulation & Finance
Enclosures

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Given the uncertain future, we believe that a qualitative evaluation of our proposed resource addition is appropriate and will further demonstrate the prudence of our resource additions at this time at a system-wide net cost of only \$14 million (compared to a total system cost of ~~more than \$1 billion~~ ^{about \$50 billion}) on a present value revenue requirements basis.

B. Restack

Q. WHAT OPTIONS DOES THE COMMISSION HAVE IF IT DOES NOT APPROVE THE COMPANY'S REQUEST?

A. I believe there are two basic options available to the Commission: (1) allow both the capacity and energy of the 187 MW solar portfolio to be re-priced through the North Dakota Restack process, or (2) direct-assign resources to be consistent with divergent state energy policies. Each of these choices carries important policy considerations.

Q. WHAT IS THE COMPANY'S RECOMMENDATION?

A. In this circumstance, we respectfully request that the capacity and energy of any resource for which the Commission does not grant an ADP be eligible to be included in the Restack process.

Q. PLEASE SUMMARIZE THE NORTH DAKOTA RESTACK PROCESS.

A. As the Commission is aware, development of a Restack Agreement with Commission Staff is guided by ten negotiating principles adopted by the Commission in the Settlement Agreement adopted in our last rate case. Key among these principles is that both the energy and capacity costs of any new resource addition (such as those proposed by the Company here) rejected by

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

IN THE MATTER OF THE APPLICATION
OF NORTHERN STATES POWER
COMPANY FOR AN ADVANCE
DETERMINATION OF PRUDENCE FOR
A 187 MW PORTFOLIO OF UTILITY
SCALE SOLAR RESOURCES

Case No. PU-14-810

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **CORRECTION TO THE REBUTTAL TESTIMONY OF NORTHERN STATES POWER COMPANY** was, on the 29th day of April 2015, served on the following by electronic mail:

The electronic mails were addressed as follows:

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