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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~~ <sup>about \$50 billion</sup>) 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 29<sup>th</sup> day of April 2015, served on the following by electronic mail:

The electronic mails were addressed as follows:

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