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August 17, 2015



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**VIA E-MAIL AND U.S. MAIL**

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

In re: Northern States Power Company  
Advance Determination of Prudence Application  
Case No. PU-15-96

Dear Commissioners:

Please docket this letter in the above-referenced case. As a review of the Commission's file will show, GDS Associates, Inc. has been retained to provide services in this case for advocacy staff. GDS has recently discovered and brought to advocacy staff's attention that its Florida office is performing some work under a joint contract with Calpine Construction Finance Company, L.P. and Seminole Electric Cooperative. This work is as a consultant for the review of the Tampa Electric Company's Transmission Formula Rate Annual Updates. The individuals involved at GDS in this case are not involved with the Florida office's work. GDS has informed us that it has determine there is no conflict of interest.

Likewise, advocacy staff does not believe there is a conflict. However, we wanted to bring this issue to the Commission's and Northern States Power Company's attention to be fully advised. We have informally agreed with Northern States Power to submit advocacy staff testimony by August 31, and request if Northern States views this as a conflict that would disqualify GDS from providing testimony in this case to promptly advise. Likewise, if the above raises any concerns for the Commission, we would appreciate being so advised.

Sheldon A. Smith\*

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Thank you for your attention to this matter.

Respectfully,



MITCHELL D. ARMSTRONG  
Special Assistant Attorney General for  
Public Service Commission Advocacy Staff

amh

cc: Illona Jeffcoat-Sacco (via e-mail only)  
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