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November 6, 2020

— VIA E-MAIL & FEDERAL EXPRESS —

Mr. Steven M. Kahl, Executive Secretary
 North Dakota Public Service Commission
 State Capitol Building
 600 East Boulevard, Dept. 408
 Bismarck, ND 58505-0480

**RE: NOTICE OF CHANGE IN RATES FOR ELECTRIC SERVICE
 CASE NO. PU-20-_____**

Dear Mr. Kahl:

Northern States Power Company, a Minnesota corporation doing business as Xcel Energy (Xcel Energy or the Company), submits an original and seven (7) copies of a Notice of Change in Rates for Electric Service (Notice) to the North Dakota Public Service Commission (Commission) pursuant to North Dakota Century Code (N.D.C.C.) § 49-05-05 and North Dakota Administrative Code (N.D.A.C.) § 69-02-02-04. A public version of the Notice is also being provided electronically to the Commission.

The rate and tariff changes proposed in this Notice would result in a net annual revenue increase of \$22,227,649 or 10.8 percent, for electric service effective on and after December 6, 2020, or upon final approval if the rates are suspended and interim rates approved by the Commission. The test year for the proposed increase is 2021.

Pursuant to the Revised Second Amended Settlement Agreement in the Company's last Rate Case (Case No. PU-12-813), the Company also provides with this notice various proposed improvements to its North Dakota Electric Rate Book. These general language and formatting changes were prompted by a previous Commission staff review and are intended to improve readability, remove unnecessary phrases and sections, and ensure the terminology is up-to-date and understandable.

Also included with this Notice is an Alternative Petition for Interim Rates (Petition), should the Commission decide to suspend the Company's Notice and proposed rates

and tariffs within thirty (30) days of filing. Pursuant to N.D.C.C. § 49-05-06(2), the Petition supports an interim revenue increase of \$16,358,221, or 7.92 percent, effective January 5, 2021, subject to refund, until final rates are placed into effect.

This Notice has been organized into the following sections:

- Notice Petition;
- Supporting Revenue Requirement Schedules, comprised of a deficiency summary, the proposed increase by customer class, a comparison of present and proposed rates, typical monthly bill impacts, and a North Dakota jurisdictional cost of service summary;
- Revised Tariffs, reflecting the changes in both legislative (red-line) and regular formats (separately provided in Volume 2); and
- Interim Rate Petition, including related schedules and tariffs (separately provided in Volume 1).

In addition, the following Direct Testimony is being filed with this Notice:

- Policy
- Overall Revenue Requirements – 2021 Test Year
- Return on Equity / Capital Structure
- Sales Forecast
- Distribution Investments and Operations
- Capital Additions, Depreciation, and Nuclear Decommissioning
- Class Cost of Service
- Rate Design
- Resource Prudence

Under separate cover, and pursuant to N.D.C.C. § 49-05-04(11), Xcel Energy has provided a check in the amount of one hundred seventy five thousand dollars (\$175,000.00) as the application fee. Also, the Company has prepaid the filing fee of fifty dollars (\$50.00) in accordance with N.D.C.C. § 49-05-05 through its periodic regulatory fee payments to the Commission.

You may direct any questions regarding this Notice or the Alternative Petition for Interim Rates to me (contact information at the top of this letter).

Steven M. Kahl
November, 6, 2020
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Sincerely,

A handwritten signature in cursive script that reads "David H. Sederquist".

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

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**Northern States Power Company
Notice of Change in Rates for Electric Service**

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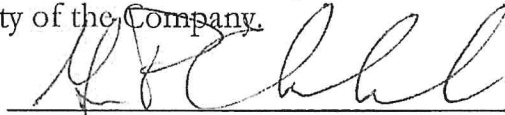
STATE OF NORTH DAKOTA
BEFORE THE
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NORTHERN STATES POWER COMPANY)
2021 ELECTRIC RATE INCREASE)
APPLICATION)
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Case No. PU-20-____

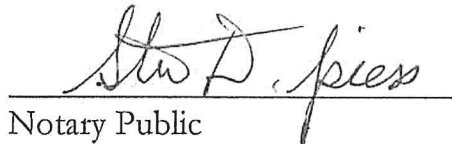
**AFFIDAVIT OF
Greg P. Chamberlain**

I, the undersigned, being first duly sworn, on oath depose and say that I am Regional Vice President for Northern States Power Company (the Company), the Applicant herein; that I have read the Notice of Change in Rates for Electric Service and the Alternative Petition for Interim Rates and that I believe all statements therein are true and correct; and that the filings are submitted and signed on behalf of the Company with the consent and authority of the Company.

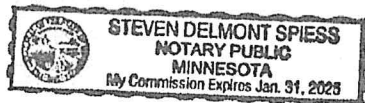


Regional Vice President, Regulatory &
Government Affairs
Northern States Power Company (Minnesota)

Subscribed and sworn to before me, this 30 day of October, 2020.



Notary Public



STATE OF NORTH DAKOTA
BEFORE THE
PUBLIC SERVICE COMMISSION

NORTHERN STATES POWER COMPANY)
2021 ELECTRIC RATE INCREASE)
APPLICATION)
)
)

Case No. PU-20-____

NOTICE OF CHANGE IN RATES FOR ELECTRIC SERVICE

I. INTRODUCTION

Northern States Power Company, a Minnesota corporation doing business as Xcel Energy (Xcel Energy or the Company), hereby provides notice to the North Dakota Public Service Commission (Commission), pursuant to N.D.C.C. § 49-05-05 and N.D.A.C. § 69-09-02-01, of the Company's intent to change electric service rates and tariffs contained in the Company's North Dakota Electric Rate Book – NDPSC No. 2 – effective December 6, 2020 unless suspended within thirty (30) days after the date of this filing. If the Commission suspends the proposed revised rates and tariffs within thirty (30) days of this Notice, the Company respectfully requests that the Commission issue an order granting interim rate relief effective January 5, 2021, without a hearing, pursuant to N.D.C.C. § 49-05-06(2). A separate Alternative Petition for Interim Rates is submitted with this Notice.

The rate and tariff changes proposed in this Notice would result in an annual increase of electric revenues of \$22,227,649, or 10.8 percent, effective for electric service on and after December 6, 2020, or upon final approval if the rates are suspended and interim rates approved. The test year for the proposed increase is 2021.

The rates and tariffs being revised are provided behind the Tariff tab in Volume 2 of this filing and consist of the amended tariffs in "legislative" (red-line) and regular formats. These tariff changes are supported by the Direct Testimonies of Company witnesses Mr. Nicholas N. Paluck and Mr. Michael A. Peppin provided with this Notice. Additionally, the Company's proposed tariffs include proposed language and formatting improvements as required by the Revised Second Amended Settlement Agreement in the Company's last Rate Case (Case No. PU-12-813). The proposed rates would affect the Company's service to all of its approximately 95,000 retail electric customers in the State of North Dakota.

A. Need for Rate Increase

The revenue deficiency is primarily a result of the Company's approximately \$10 billion of capital investments in electric generation, distribution, transmission, and business systems infrastructure since the Company's last general electric rate application (Case No. PU-12-813), which employed a 2013 test year, as well as increased operations and maintenance (O&M) costs, including O&M for new resource additions. The revenue deficiency also reflects higher depreciation costs associated with the Company's request to adjust the remaining lives of large, baseload resources that will be retired in 2023 and 2026, as well as a decrease in electric sales reflecting, in part, the impacts of the COVID-19 pandemic and associated economic downturn.

Company witness Mr. Greg P. Chamberlain provides an overview of the revenue deficiency and discusses the primary factors affecting the Company's cost of service in his Direct Testimony. Company witness Mr. Mark P. Moeller describes the Company's major capital investments in more detail in his Direct Testimony. Company witness Mr. Christopher J. Shaw discusses the Company's key generation investments and retirements in greater detail. Company witness Mr. Benjamin C. Halama describes and provides the revenue requirement effects of these changes in his Direct Testimony.

This rate increase is needed to provide the Company with an opportunity to earn a reasonable return on equity (ROE) for its North Dakota electric operations. The Company is proposing an ROE of 10.20 percent. The ROE approved by the Commission in Case No. PU-12-813 was 9.75 percent in 2013, 10.00 percent in 2014 and 2015, and 10.25 percent from 2016-2020; pursuant to the Settlement in Case No. PU-18-155, the Company is currently required to refund to customers in 2019 and 2020 any earnings in excess of 9.85 percent. The Direct Testimony of Company witness Mr. Dylan D'Ascendis filed with this Notice supports an ROE of 10.20 percent using a capital structure of 52.50 percent equity. The overall proposed rate of return (ROR) is 7.35 percent.

B. Proposed Cost Allocation and Rate Design

The Company is not proposing any material changes to its cost allocation and rate design. Mr. Michael Peppin provides the Class Cost of Service Study which Mr. Nicholas Paluck relies upon for the proposed class revenue allocations. Mr. Paluck discusses the objectives that guided the Company's proposed rate design in his Direct Testimony. Schedule 2 to this Notice provides an estimate of the number of

customers whose cost of service will be affected and the proposed annual increase in revenues by customer class.

The proposed rate changes, effective December 6, 2020 if not suspended, do not affect recovery of the cost of fuel and purchased energy, which are separately recovered in retail rates through the Fuel Cost Rider provision of the Company's North Dakota Electric Rate Book – NDPSC No. 2.

Additionally, the Company is proposing to “roll” into rate base certain renewable energy and transmission projects that are currently being recovered through the Renewable Energy Rider and the Transmission Cost Recovery Rider. The transfer of these projects from riders into base rates does not impact the amount of the overall revenue deficiency.

C. The Proposed Rate Change Would Serve the Public Interest

The rate increase would allow the Company to recover its reasonable cost of service and establish a fair allocation of the increase among the various customer classes. The proposed rate increase does not unreasonably discriminate between the Company's customers or customer classes and does not violate any Commission laws or rules. The proposed rates would thus serve the public interest and should be effective December 6, 2020 as proposed. In the alternative, the Company requests the Commission allow the Company to implement an interim rate increase of \$16,358,221, or 7.92 percent, effective January 5, 2021, until final base rates are placed into effect, as set forth in the Alternative Petition for Interim Rates enclosed with this Application.

II. Required Filing Information

A. Name and Address of Applicant

Pursuant to N.D.C.C. Title 49; N.D.A.C. Article 69-02; and the Commission's “How to File” guidelines, the name and address of the public utility submitting this Notice is:

Northern States Power Company
414 Nicollet Mall
Minneapolis, Minnesota 55401
Attn: Greg Chamberlain
RVP, Rates & Regulatory, NSPM

The Company's North Dakota division office is located at:

Northern States Power Company
2302 Great Northern Drive
Fargo, North Dakota 58102
Attn: David H. Sederquist
Sr. Consultant, Regulation & Finance
Phone: (701) 241-8632
Fax: (701) 241-8682
Email: dave.sederquist@xcelenergy.com

In addition, the Company requests the following names be placed on the Commission's official service list for this proceeding:

Matt Harris
Lead Assistant General Counsel
Xcel Energy Services Inc
414 Nicollet Mall, 401 - 8th Floor
Minneapolis, MN 55401
Phone: (612) 330-7641
Matt.B.Harris@xcelenergy.com

Lynnette Sweet
Regulatory Administrator
Xcel Energy
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Phone: (612) 321-3159
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Zeviel Simpser
Partner
Dorsey & Whitney LLP
50 South Sixth Street, Suite 1500
Minneapolis, MN 55402
Phone: (612) 492-6129
Simpser.Zev@dorsey.com

B. Proposed Rates and Tariffs

Pursuant to N.D.C.C. § 49-05-05 and N.D.A.C. § 69-09-02-01, the Company is submitting the following as part of this Notice:

- A determination of the projected revenue deficiency for the 2021 rate case test year (*see* Benjamin C. Halama, Exhibit___(BCH-1), Schedule 7);
- The number of customers by class, the proposed revenue apportionment for each customer class, and the projected miscellaneous revenues for the 2021 test year (*see* Nicholas N. Paluck, Exhibit___(NNP-1), Schedule 2);
- A summary comparison of the proposed retail rates to the Company's present rates (*see* Nicholas N. Paluck, Exhibit___(NNP-1), Schedule 5);

- An estimation of the anticipated impact of the increase on monthly customer bills at various usage levels (*see* Nicholas N. Paluck, Exhibit___(NNP-1), Schedule 6);
- A summary of the Jurisdictional Cost of Service Study, which shows the 2021 test year rate base, operating income, revenue requirement and deficiency, and other related information (*see* Benjamin C. Halama, Exhibit___(BCH-1), Schedule 3A);
- A summary list of the tariff sheets proposed to be changed (*see* Volume 2);
- The proposed tariffs in “legislative” (red-line) and regular formats, respectively (*see* Volume 2); and
- An Alternative Petition for Interim Rates, with supporting schedules, with rates becoming effective January 5, 20221, and subject to refund pending the final order in this case.

C. Filing Fee and Verification

Pursuant to N.D.C.C §49-05-04(11), the Company is separately providing a check for the amount of one hundred seventy five thousand dollars (\$175,000.00) as the application fee. Also, the Company has prepaid the filing fee of fifty dollars (\$50.00) through its periodic regulatory fee payments to the Commission, pursuant to N.D.C.C. §49-05-05, which provides no change shall be made by any public utility in any tariffs or rates except after thirty days’ notice and with an accompanying fifty-dollar filing fee. Finally, the enclosed sworn affidavit of Greg P. Chamberlain verifies the correctness of the Notice, proposed rate and tariff changes, and supporting schedules.

D. Articles of Incorporation

Pursuant to N.D.A.C. § 69-02-02-04, Xcel Energy is required to identify the Commission proceeding in which it previously filed its articles of incorporation. Those were filed in the Corporate Documents Case No. PU-09-664.

III. NOTICE TO AFFECTED CUSTOMERS

N.D.A.C. § 69-09-02-02.1(2)(a)(2) requires a notice to electric customers not later than thirty days after filing an increase in rates. In compliance with this requirement, the Company will include a customer message on its bills to be issued to electric customers in North Dakota on and after December 6, 2020, if the rate increase is not suspended. The customer message would be distributed for one billing cycle and would describe: (1) the reasons for the rate changes; and (2) the rate impact information required by N.D.A.C. § 69-09-02-02.1(2)(a)(2). Information on how to contact the Company or the Commission with questions or comments about the changes would also be provided.

If the Commission suspends the proposed increase within 30 days and issues an order allowing the Company to place the interim electric rate increase in effect on January 5, 2021, subject to refund with interest, the Company would include a customer information notice in bills to be issued to electric customers in North Dakota on and after January 5, 2021, with a statement that the applied rates are interim in nature and that final rates will not be effective until Commission action. The customer information notice would be distributed for one billing cycle, would describe the reasons for the interim rate change, the rate impact of the change and would provide information on how to contact the Company or the Commission with questions or comments about the changes.

IV. PROPOSED PROCEDURES

Pursuant to N.D.C.C. § 49-05-05, the Company respectfully requests that the Commission allow the proposed rate and tariff changes shown in Schedules 6, 7 and 8 to be placed into effect December 6, 2020, without suspension or hearing. This Notice of Change in Rates for Electric Service and schedules thereto fully satisfy the requirements for a notice of rate changes effective December 6, 2020, subject to the Commission's authority to thereafter prospectively change such rates and tariffs through a final order under N.D.C.C. § 49-05-06 if the Commission formally investigates the proposed rate changes through a hearing. The Company has included verified Direct Testimony and schedules in support of this Notice.


The Company is also receptive to working with Commission Staff to promptly resolve the proceeding through an information and settlement process.

V. CONCLUSION

For the foregoing reasons, Xcel Energy provides this Notice to the Commission of new electric rates and tariffs to be effective December 6, 2020, pursuant to N.D.C.C. § 49-05-05 and N.D.A.C. § 69-09-02-01. If the Commission suspends the proposed revised rates and tariffs within 30 days of this Notice, the Company requests that the Commission issue an order allowing the Company's proposed interim rates to be effective January 5, 2021, subject to refund with interest, pursuant to N.D.C.C. § 49-05-06(2) (see Alternative Petition for Interim Rates submitted with this filing).

Please direct any questions regarding this Notice of Change in Rates for Electric Service and/or the Alternative Petition for Interim Rates to Mr. David H. Sederquist at 701-241-8632.

Respectfully submitted,

By: 

Greg P. Chamberlain
Regional Vice President
Northern States Power Company (Minnesota)

Dated: November 6, 2020

Deficiency and Proposed Revenue

Pursuant to N.D.C.C. § 49-05-05 and N.D.A.C. § 69-09-02-01, the Company is submitting the following as part of this Notice:

- A determination of the projected revenue deficiency for the 2021 rate case test year (*see* Benjamin C. Halama, Exhibit____(BCH-1), Schedule 7);
- The number of customers by class, the proposed revenue apportionment for each customer class, and the projected miscellaneous revenues for the 2021 test year (*see* Nicholas N. Paluck, Exhibit____(NNP-1), Schedule 2);
- A summary comparison of the proposed retail rates to the Company's present rates (*see* Nicholas N. Paluck, Exhibit____(NNP-1), Schedule 5);
- An estimation of the anticipated impact of the increase on monthly customer bills at various usage levels (*see* Nicholas N. Paluck, Exhibit____(NNP-1), Schedule 6);
- A summary of the Jurisdictional Cost of Service Study, which shows the 2021 test year rate base, operating income, revenue requirement and deficiency, and other related information (*see* Benjamin C. Halama, Exhibit____(BCH-1), Schedule 3A);
- A summary list of the tariff sheets proposed to be changed (*see* Volume 2);
- The proposed tariffs in "legislative" (red-line) and regular formats, respectively (*see* Volume 2); and

STATE OF NORTH DAKOTA
BEFORE THE
PUBLIC SERVICE COMMISSION

NORTHERN STATES POWER COMPANY)
2021 ELECTRIC RATE INCREASE)
APPLICATION)
)
)
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Case No. PU-20-____

ALTERNATIVE PETITION FOR INTERIM RATES

I. Introduction

Northern States Power Company, a Minnesota corporation doing business as Xcel Energy (Xcel Energy or the Company), hereby submits to the North Dakota Public Service Commission (Commission) this Alternative Petition for Interim Rates (Petition) for its North Dakota retail electric customers, pursuant to N.D.C.C. § 49-05-06. The Company respectfully requests that the Commission authorize, on an interim basis, an interim rate increase of \$16,358,221, or 7.92 percent, to be effective January 5, 2021.

II. Effective Date

The date of the submission of this Petition is November 6, 2020. The Petition is submitted as part of the Company's Notice of Change in Rates for Electric Service (Notice). Pursuant to N.D.C.C. § 49-05-06, Xcel Energy requests that, should the Commission suspend the operation of the general rate schedules that accompany the Notice, the proposed interim rates be made effective on January 5, 2021. N.D.C.C. § 49-05-06(2) provides that if the change in final rates is suspended and interim rates are requested, the Commission "shall order that the interim rates take effect no later than sixty (60) days after the initial filing date and without a public hearing." If the interim rate amounts are in excess of the final rates approved by the Commission, the

interim rates will be subject to refund plus reasonable interest at a rate to be determined by the Commission.

III. Description and Need for Interim Rates

Xcel Energy is entitled to interim rate relief based on the Notice and its supporting testimony and schedules along with the supporting schedules attached to this Petition. The proposed interim rate increase applies to all of Xcel Energy's approximately 95,000 retail electric customers in the State of North Dakota. Interim rates are needed because a significant portion of the increased cost of service reflected in the Company's general rate Notice will be incurred before the anticipated effective date of the general rate increase, assuming the Commission suspends the rates filed with the Notice. Without interim rate relief, Xcel Energy would be unable to recover its increased costs of service while the rates were suspended.

Schedules attached to this filing support the interim revenue deficiency of \$16,358,221, or 7.92 percent, for the Company's North Dakota electric utility operation (exclusive of separately collected revenues related to franchise fees or gross earnings taxes imposed by local governmental units). As required by N.D.C.C. § 49-05-06 and as indicated in Schedules 2 and 3 accompanying this Petition, the Company has removed from the interim rate request the recovery of costs that are not of the same nature and kind as allowed in the Company's most recent electric rate proceedings (Case Nos. PU-10-657, PU-11-55 and PU-12-813). For example, the Company has removed from the interim rate revenue requirement changes in depreciation rates not previously approved by the Commission, incentive compensation in excess of 15 percent of base salary, and charitable contributions.

In addition, pursuant to the settlement in Case No. PU-12-813 (approved by the Commission on February 26, 2014), the return on equity (ROE) requested for interim

rates is 10.00 percent, which is less than the ROE of 10.20 percent requested in the Notice.¹

Finally, the interim rate revenue requirement has been adjusted to reflect the effect of the other interim adjustments on cash working capital and on net operating losses.

The test year for the Company's Notice and this Alternative Petition for Interim Rates is the calendar year ending December 31, 2021. The revenue requirement study in the rate Notice shows an annual test year deficiency in revenue of \$22,227,649, or 10.8 percent, under present rates. Present rates, as referred to in this Petition, are the rates authorized by the Commission in its final order approving the settlement agreement in Case No. PU-12-813.

IV. Interim Rate Schedules

The following rate schedules are proposed to be effective on an interim basis on January 5, 2021, subject to refund:

<u>Schedule</u>	<u>Sheet No.</u>
• Residential Service	5-1
• Residential Time of Day Service	5-2
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• General Service	5-25
• General Time of Day Service	5-28
• Peak-Controlled Service	5-32
• Peak-Controlled Time of Day Service	5-36
• Street Lighting System Service (Leased Equipment)	5-59

¹ Case No. PU-12-813, REVISED SECOND AMENDED SETTLEMENT AGREEMENT (02/25/14), Section I.A.3, p. 9, approved in ORDER ADOPTING SETTLEMENT (02/26/14).

• Street Lighting Service - Unmetered (Purchased Equipment) (Closed)	5-60
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• Standby Service Rider	5-82
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The rate schedules containing proposed interim rates are provided in Volume 2 in legislative and regular formats. No change has been made in the existing rate design for purposes of establishing interim rates. To provide the additional interim increase of \$16,358,221 on an annualized basis, a uniform 11.49 percent “surcharge” would be applied during the interim period to base rate revenues currently being recovered from each customer class. This interim surcharge percentage is higher than the overall interim revenue increase of 7.92 percent because the interim surcharge does not apply to fuel and purchased energy costs, which are not included in base rates.

V. Supporting Schedules and Workpapers

The following interim rate schedules are included in support of this Interim Rate petition:

- Schedule 1: Interim revenue deficiency summary;
- Schedule 2: Interim operating income bridge schedule and operating income summary under present and proposed interim rates;
- Schedule 3: Interim rate base bridge schedule;
- Schedule 4: Summary of interim capitalization and cost of capital;
- Schedule 5: Interim jurisdictional cost of service study;
- Schedule 6: Interim rate increase percent by customer class;
- Interim Rate tariffs – legislative (red-line) format (Volume 1)
- Interim Rate tariffs – regular format (Volume 1)

VI. Interim Bills/Customer Notice

Xcel Energy proposes to include rate information in customer bills beginning on January 5, 2021, including an informational memo in customer bills to communicate to customers that their bill reflects an increase associated with the Company's interim rate request.

VII. Surety for Refund

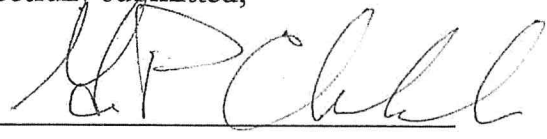
Pursuant to N.D.C.C. § 49-05-06(3), the Company respectfully requests that the Commission not require a bond to secure any projected refund. The statute makes such a requirement discretionary. Xcel Energy submits as part of this Petition an Agreement and Undertaking regarding the Company's commitment to refund any interim rates determined by the Commission to be in excess of final rates. These commitments are sufficient to secure any required refund.

VIII. Conclusion

Xcel Energy hereby submits this Alternative Petition for Interim Rates. If the Commission suspends the operation of the rate schedules listed in the Notice under N.D.C.C. § 49-05-06, the Company respectfully requests that the Alternative Petition for Interim Rates be promptly considered and accepted by the Commission, so that interim rate schedules can be effective on January 5, 2021, sixty days after filing. Interim revenues would be subject to refund pending final Commission action on the general rate increase Notice.

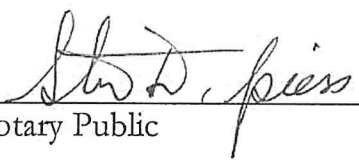
Dated: October 30, 2020

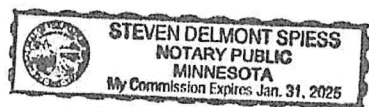
Respectfully submitted,

By: 

Greg P. Chamberlain
Regional Vice President
Northern States Power Company (Minnesota)

Subscribed and sworn to before me this
30 day of October


Notary Public



STATE OF NORTH DAKOTA
BEFORE THE
PUBLIC SERVICE COMMISSION

NORTHERN STATES POWER COMPANY)
2021 ELECTRIC RATE INCREASE)
APPLICATION)
)
)

Case No. PU-20-____

AGREEMENT AND UNDERTAKING

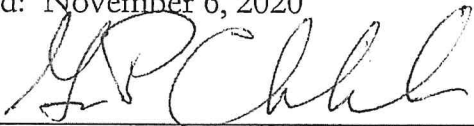
Northern States Power Company, doing business as Xcel Energy (Xcel Energy or Company), in conjunction with the Alternative Petition for Interim Rates filed with the North Dakota Public Service Commission (Commission), makes the following unqualified agreement concerning refunding any portion of the interim rate increase in electric rates determined by the Commission to be in excess of final rates.

Pursuant to North Dakota Century Code § 49-05-06(4), Xcel Energy hereby agrees and undertakes to refund to its electric customers in North Dakota the amount, if any, collected during the interim rate period in excess of final rates, plus reasonable interest at the rate determined by the Commission, computed from the effective date of the interim rates through the date of refund.

In addition, Xcel Energy agrees to keep such records of sales and billings under the proposed interim rates as will be necessary to compute any potential refund.

This Agreement and Undertaking is made pursuant to authority granted by the Board of Directors of the Company.

Dated: November 6, 2020

By: 

Greg P. Chamberlain
Regional Vice President, Regulatory & Government Affairs
Northern States Power Company (Minnesota)