

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

NORTHERN STATES POWER COMPANY
ADVANCE DETERMINATION OF PRUDENCE –
ACQUISITION OF 120 MW NORTHERN WIND FACILITY

CASE NO. PU-21-_____

MOTION TO CONSOLIDATE

Pursuant to North Dakota Century Code (N.D.C.C.) § 49-01-07 and North Dakota Administrative Code (N.D.A.C.) § 69-02-04-04, Northern States Power Company, doing business as Xcel Energy, a Minnesota corporation (NSP or the Company), hereby moves the North Dakota Public Service Commission (Commission) to consolidate the Company's Application for Advance Determination of Prudence (ADP) in the above-captioned matter with the Company's Application for ADP in Case No. PU-20-425. Grounds for this motion are as follows:

1. Under N.D.C.C. § 49-01-07, the Commission is authorized to conduct its proceedings "in a manner most conducive to the proper dispatch of business and to the ends of justice."
2. To this end, under N.D.A.C. § 69-02-04-04, the Commission may, upon its own motion or motion by any party, order two or more proceedings involving a similar question of law or facts to be consolidated for hearing where the rights of the parties or the public will not be prejudiced by the consolidation.
3. On October 13, 2020, the Company filed an Application for ADP for a portfolio of four repowered wind projects, all of which stemmed from a July 2020 solicitation for wind repowering proposals. This Application was assigned Case No. PU-20-425 (Wind Repowering ADP).
4. On a date even with this Motion, the Company filed an Application for ADP for the Northern Wind project, a wind repowering and acquisition that was part of the same July 2020 solicitation but was not included in the Company's prior Application because at that time the transaction related to Northern Wind was not sufficiently mature to be included in the Wind Repowering ADP.
5. As described in the Company's Application for ADP filed in the above-captioned matter, following extensive negotiations with the project developer, the

Company reached an agreement to repower and acquire the Northern Wind facility in a manner that is beneficial to NSP customers.

6. As described in the Company's Application for ADP and supporting testimony filed in the above-captioned matter, the Company's economic analysis and modeling of the proposed Northern Wind project was conducted in the same manner and using the same assumptions as in the Application in the Wind Repowering Case. Further, the analysis presented in the instant proceeding includes an assumption that the projects in the Wind Repowering Case will be placed in-service.

7. The projects in the Wind Repowering Case and the instant proceeding: (a) all stem from the same solicitation process; (b) have been undertaken at this time for the same purposes – capturing customer benefits or repowering while supporting economic development; (c) have been evaluated on the same basis; and (d) are part and parcel of the same overall portfolio.

8. Pursuant to N.D.C.C. § 49-01-07 and N.D.A.C. § 69-02-04-04, in light of the similar facts and circumstances applicable to both Applications, the Company hereby respectfully requests the Commission issue an Order consolidating for hearing the Application in the above-captioned matter with the Application in Case No. PU-20-425.

Respectfully submitted,

Dated: March 2, 2021

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By: _____

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