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FEB - 9 2022

NORTH DAKOTA
PUBLIC SERVICE COMMISSION
Neil Person, CPA
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February 9, 2022

via hand-delivery

Steve Kahl, Executive Secretary
North Dakota Public Service Commission
600 E. Blvd. Ave. Dept. 408
Bismarck, ND 58505-0480

Re: Northern States Power Company, d/b/a Xcel Energy., Case No. **PU-21-381**

Attached are an original and seven copies of **AARP's Petition to Intervene** in the above referenced matter.

Please feel free to contact me with any questions or concerns.

Sincerely,

TSCHIDER and SMITH



David A. Tschider, ID #04224
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Counsel for AARP

**STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION**

Northern States Power Company 2021	)	Case No. PU-21-381
Natural Gas Rate Increase Application	)	

PETITION TO INTERVENE OF AARP

Comes Now AARP¹, pursuant to Commission Rules of Practice and Procedure 69-02-01-05, 69-02-01-06, and 69-02-01-07, and respectfully petitions for intervention in the above-captioned matter.

In support of this petition, AARP states as follows:

1. On September 2, 2021, Northern States Power Company, a Minnesota corporation doing business as Xcel Energy ("Xcel" or "Company") filed a request for a 10.5% increase in its revenue requirement for its North Dakota natural gas customers.

2. AARP, with millions of members in all 50 States and the District of Columbia, Puerto Rico, and U.S. Virgin Islands, is a nonpartisan, nonprofit, nationwide organization that helps people turn their goals and dreams into real possibilities, strengthens communities and fights for the issues that matter most to families such as healthcare, employment and income security, retirement planning, affordable utilities and protection

¹In 1999, the "American Association of Retired Persons" changed its name to simply "AARP", in recognition of the fact that people do not have to be retired to become members.

from financial abuse. AARP has approximately 84,000 in North Dakota, many of whom are residential electric customers of the Applicant Company.

3. AARP's interest in this matter and its grounds for intervention relate to the substantial increase in natural gas rates proposed by Xcel for the residential customer class. AARP desires to advocate on behalf of residential gas customers in this case to ensure that their rates overall are no higher than a level that is just and reasonable, and to further ensure that residential customers do not pay more than their fair share compared to larger customer classes.

4. The Xcel proposals in this case would directly and adversely impact many customers who are aged 50 and over. People aged 50 and over are more vulnerable to increases in energy prices. Generally, these consumers also devote a higher percentage of their total spending than do other age groups towards residential energy costs. Many older consumers also have special needs and safety concerns regarding their access to natural gas service.

5. AARP believes that its intervention and participation in this proceeding would serve the public interest. AARP will accept the procedural status of the rate case as it stands prior to intervention. AARP's intervention would not unduly delay the proceedings nor would it prejudice the rights of other parties.

6. A *Motion for Admission Pro Hac Vice* of John B. Coffman is being filed simultaneously at the North Dakota Public Service Commission and with the North Dakota Board of Law Examiners. Mr. Coffman has 33 years of experience as a utility rate expert and attorney. He routinely appears and participates in matters before other state public utility commissions, including rate case appearances in Missouri, Illinois,

Georgia, Florida, Alabama, New Jersey, California, Kansas, Arizona, Colorado, South Carolina, and Minnesota. Mr. Coffman has been permitted to appear *pro hac vice* in previous rate cases in North Dakota, including Xcel's most recent electric rate case in North Dakota--Case No. PU-20-441.

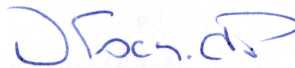
7. Service of any document or orders in this matter should be addressed to the undersigned attorney and also to:

John B. Coffman
John B. Coffman, LLC
871 Tuxedo Blvd.
St. Louis, MO 63119-2044
Ph: (573) 424-6779
E-mail: john@johncoffman.net
Attorney for AARP

WHEREFORE, AARP respectfully requests that the Commission grant its Petition to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted this 9th day of February, 2021.

TSCHIDER and SMITH



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**STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION**

**Northern States Power Company 2021
Natural Gas Rate Increase Application**

)
)

Case No. PU-21-381

CERTIFICATE OF SERVICE

I hereby certify that the original and seven (7) copies of the foregoing was hand delivered/mailed/emailed, on this 9th day of February, 2021 to the following:

Executive Secretary Public Service Commission
600 East Boulevard Avenue, Dept. 480
Bismarck, ND 58505-0480
ndpsc@nd.gov

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