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June 13, 2022

NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Steve Kahl, Executive Secretary
North Dakota Public Service Commission
600 E. Blvd. Ave. Dept. 408

via hand-delivery

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 Post-Hearing Statement of Position** in the above referenced matter.

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

Sincerely,

TSCHIDER and SMITH

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AARP's Post-Hearing Statement of Position

AARP

David Tschider

**STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION**

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

AARP’S POST-HEARING STATEMENT OF POSITION

Comes Now AARP and hereby submits its post-hearing statement of position on cost allocations and rate design. On May 27, 2022, Northern States Power (“NSP”, “Xcel”, or “Company”) and the Advocacy Staff of the Commission (“Staff”) jointly filed two settlement agreements with the Commission, proposing to resolve the issues in this case.

AARP did not object to the Settlement Agreement on Revenue Requirement. On May 31st, 2022, AARP did object to the non-unanimous Settlement Agreement on Class Cost of Service, Revenue Allocations, and Rate Design (“Non-Unanimous Settlement on Rate Design”) on several grounds, including the fact that would move the residential customer class further from its cost of service, and that it would put in place a residential rate design that was extremely unreasonable and unfair to low-usage customers.

Class Cost Allocations

Based on the record made at the June 1, 2022 hearing in this case¹, and in the spirit of compromise, AARP proposes that the Commission adopt class cost allocations

¹ Including the testimony of Staff witness Karl Pavlovic, Exhibits 17 and 29.

that are at least equal across customer classes. Since the agreed upon revenue requirement increase is approximately 7.5%, the cost responsibility of each customer class should be increased equally to the system average of 7.5%.

Residential Rate Design

Based on the record made at the June 1, 2022 hearing in this case, and in the spirit of compromise, AARP proposes that the Commission allow the Company to retain the current customer charge at \$18.48, and then apply whatever revenue increase is allocated in this case to the residential customer class (either 7.5% or 8.75%) in the form of a new volumetric *per therm* charge.

The overwhelmingly majority of costs for the delivery of gas would still be collected through the \$18.48 customer charge; however, going forward, the residential rate design would contain a small usage-based component. The North Dakota NSP division of Xcel would still have the highest fixed customer charge of any of its affiliates, but the result would be at least some balance between fixed and usage-based rate components.

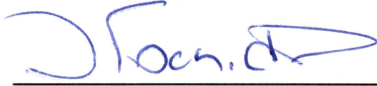
While it disagrees with this AARP proposal, the Company has calculated what the new volumetric *per therm* delivery charge would be, if adopted (approximately 0.05 per therm). See the late-filed exhibit from the Company on showing this specific calculation.²

Respectfully submitted this 13th day of June, 2022.

s/

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² Apparently filed in this case filed on or about June 13, 2022.



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CERTIFICATE OF SERVICE

I hereby certify that the original and seven (7) copies of the foregoing was hand delivered/mailed/emailed, on this 13th day of June, 2022 to the following:

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