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March 14, 2024

—VIA EMAIL & U.S. MAIL—

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

RE: REQUEST TO WITHDRAW
APPLICATION FOR ADVANCE DETERMINATION OF PRUDENCE -
BROOKINGS COUNTY TO LYON COUNTY AND HELENA TO
HAMPTON 345 kV SECOND CIRCUIT PROJECT
(CASE No. PU-23-295)

Dear Mr. Kahl:

Northern States Power Company, doing business as Xcel Energy, by way of this letter formally requests to withdraw its Application for an Advance Determination of Prudence (ADP) filed with the North Dakota Public Service Commission on August 29, 2023 for the Brookings County – Lyons County Second Circuit Project and Helena – Hampton Second Circuit Project (the Project).

As background in this matter, the Project was studied and reviewed as part of the 2022 MISO Transmission Expansion Plan (MTEP22). In December 2022, the MISO Board of Directors approved the MTEP22 report granting the Project the necessary MISO approval.

In its Order dated February 21, 2024 in Case No. PU-23-366, the Commission adopted the First Amended and Restated Settlement Agreement which removed the requirement that the Company must file ADP applications for proposed new construction, rehabilitation, or acquisition of certain resources. The original intent of the ADP obligation was to increase transparency and engage with the Commission regarding signification resource additions in advance of general rate proceedings.

Given the robust analysis conducted by MISO, carrying out the full ADP process for the Project is unnecessarily onerous and time consuming for the Commission and the Company. If our withdrawal request is granted, the Company would instead include the Project in our next Transmission Cost Recovery Rider (TCRR) application to be filed this fall. Through the TCRR process the Commission can review the Project and determine whether the investments and associated costs are recoverable through the TCRR.

The Company has discussed this request with Commission Staff. Staff is in agreement that this is a reasonable request given the circumstances of this matter. Please be advised that the Company is not waiving any rights or arguments with respect to the prudence of the Project.

We thank the Commission and Staff for your time and consideration of this matter. Please contact me at alex.j.nisbet@xcelenergy.com if you have any questions regarding this correspondence.

Sincerely,

/s/

ALEX NISBET
REGULATORY POLICY SPECIALIST

cc: Robert Frank
Victor Schock