2302 Great Northern Drive
Fargo, ND 54802

March 14, 2024

—Via Electronic Mail and U.S. Mail—

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
BIG STONE SOUTH-ALEXANDRIA-BIG OAKS 345 KV LINE
CASE NO. PU-23-329

Dear Mr. Kahl:

Northern States Power Company, doing business as Xcel Energy, by way of this letter formally withdraws its Application for an Advance Determination of Prudence (ADP) filed with the North Dakota Public Service Commission on October 13, 2023 for the portions of the Big Stone South – Alexandria – Big Oaks 345 kV Transmission Line Project (the Project) in which it will have an ownership interest.

The Project was studied, reviewed, and approved as part of the Long-Range Transmission Planning (LRTP) Tranche 1 Portfolio by the Midcontinent Independent System Operator, Inc.'s (MISO) Board of Directors in July 2022 as part of its 2021 Transmission Expansion Plan (MTEP21) report.

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 both 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 (701) 929-0547 or alex.j.nisbet@xcelenergy.com if you have any questions regarding this correspondence.

Sincerely,

/s/

ALEX NISBET
REGULATORY POLICY SPECIALIST

cc: Chris Hanson
Victor Schock