

TSCHIDER & SMITH

LEGAL - ACCOUNTING - TAX

2005 N. KAVANEY DRIVE, SUITE 100
PO BOX 754
BISMARCK, ND 58502
TELEPHONE 701-258-4000
Fax 701-258-4001

Sean O. Smith, Attorney
David A. Tschider, Attorney
Amber Smith-Heinert, Attorney
Morris A. Tschider (1933-2022)

Casey Heinert, CPA
Kate Barone, CPA

May 29, 2024

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, Case No. PU-23-367

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
Attorney at Law
Tschider & Smith Law Firm
2005 N Kavaney Drive, Suite 100
PO Box 754
Bismarck ND 58501-0754
701-258-4000
dtschider@tschider-smithlaw.com
Counsel for AARP

**STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION**

**Northern States Power Company)
2024 Natural Gas Rate Increase)**

Case No. PU-23-367

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 December 29, 2023, Applicant Northern States Power (“NSP” or “Company”) filed a natural gas rate request of 9.4% increase in overall revenue requirement, but also requested a significantly higher increase for the average residential customer of **12.5%**. Under this proposal, the residential customer charge would increase from \$22.25 to \$25.00 a month.

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,

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.

employment and income security, retirement planning, affordable utilities and protection from financial abuse. AARP has approximately 83,000 members in North Dakota, many of whom are residential gas 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 the Company for the residential customer class. AARP desires to advocate on behalf of residential natural 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 Company 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 electric 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.

5. AARP also plans to file a *Motion for Admission Pro Hac Vice* for John B. Coffman at the North Dakota Public Service Commission and with the North Dakota Board of Law Examiners. Mr. Coffman has 35 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, Texas, New Jersey, California, Kansas, Arizona, Colorado, South Carolina, Alaska, and Minnesota. Mr. Coffman has been permitted to appear *pro hac vice* in previous rate cases by North Dakota Public Service Commission, including representation in previous Company rate cases.

6. 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
Counsel 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 29th day of May, 2024.

TSCHIDER and SMITH



David A. Tschider, ID# 04224
Attorney at Law
Tschider & Smith Law Firm
2005 N Kavaney Drive, Suite 100
PO Box 754
Bismarck ND 58501-0754
701-258-4000
dtschider@tschider-smithlaw.com
Counsel for AARP

**STATE OF NORTH DAKOTA
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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 29th day of May, 2024 to the following:

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

Northern States Power Company
2302 Great Northern Drive
Fargo, North Dakota 58102
Attn: Alex Nisbet Regulatory Policy Specialist
alex.j.nisbet@xcelenergy.com

Zeviel T. Simpser
Lead Counsel
Dorsey & Whitney
50 S. 6th St., Suite 1500
Minnesota 55402-2157
(612) 492-6129
simpser.zev@dorsey.com

Christine Schwartz
Regulatory Administrator
Xcel Energy
414 Nicollet Mall, 401 – 7th Floor
Minneapolis, MN 55401
regulatory.records@xcelenergy.com

Victor Schock
PSC Advocacy Staff
600 East Boulevard Avenue
Bismarck, ND 58505-0480
vschock@nd.gov

Brian Johnson
Special Assistant Attorney General
600 East Boulevard Avenue, Dept. 408
Bismarck, ND 58505
brjohnson@nd.gov

Christopher C. Hanson
PSC Advocacy Staff
600 East Boulevard Avenue
Bismarck, ND 58505
cchanson@nd.gov



David A. Tschider