



500 West Russell Street
Sioux Falls, South Dakota 57101

April 5, 2013

VIA ELECTRONIC FILING

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
State Capitol Building
500 East Capitol Avenue
Pierre, South Dakota 57501

RE: APPLICATION OF NORTHERN STATES POWER COMPANY DBA XCEL ENERGY
FOR AUTHORITY TO INCREASE ITS ELECTRIC RATES
DOCKET NO. EL12-046

Dear Ms. Van Gerpen:

This letter is in followup to a concern raised at the March 26, 2013 hearing of the South Dakota Public Utilities Commission about an unanswered question related to corporate aviation services. In summary, we have gathered responsive information to help provide travel purposes for individuals flying on the two leased corporate aircraft during 2011. In this rate case, we requested recovery of 50% of the aviation costs and the South Dakota jurisdiction portion of that aviation expense is \$58,300. The information attached and described below was sent to Commission staff earlier this week and we agree it may be constructive to formally provide to the record for this proceeding.

To provide some background context, while preparing their testimony, Commission staff had several follow-up questions to aviation-related discovery responses. We were able to give responses quickly to most questions but notified staff we would not be able to gather the travel purposes for flights during 2011 in time for use in testimony. Shortly after that we began settlement discussion; I was not aware there was continued interest in completing the aircraft analysis and apologize for not checking into this further.

The planes will carry multiple passengers, each who will have their own reason for traveling; consequently we do not collect a purpose for each flight, but rather for each passenger's travel. In 2011, our Aviation Services department had 9 classifications for travel. Attachment A summarizes the passenger usage by classification for 2011 and Attachment B provided the purposes and number of people on each of the flights (trips) for both planes—392 trips on one plane and 384 trips on the other.

Attachment C is a flight log for 2011; this was provided to staff originally in November 2012. The trip numbers in Attachment A and Attachment C correspond to show how many people were on each flight and the coded purpose for their travel.

Where Attachment B provides a single business purpose and lists more than 1 type of individual traveling, the table is indicating those persons traveled under the same purpose classification. The passenger ID field has four options: Employee, Non-Employee, Dependent and Spouse. Board of Directors will occasionally fly to BOD meetings and for purposes of this report these instances are coded as "Employee". A "Non-Employee" can be various individuals traveling in support of Company business and could include: contractors, consultants, project vendor/supplier, investment relations consultant or analyst and, guests.

Non-business travel is very limited. There are certain corporate and industry functions requiring attendance of spouse (EEI Conference and BOD Meeting) and where that occurs, the business function is listed along with the ID of "Spouse"; instances of this purpose are limited as well.

The 9 travel purposes used by Aviation Services are listed below; additional definition is included where it may not be self explanatory.

- **BSM-Business Unit Ops/staff Meeting:** oversight/management necessary in support of business operations, staff supervision, project management, work assignment, etc.
- **Exe-Xcel Executive business Travel**
- **BOD-Board of Directors Meeting**
- **IVR-Investor Relations:** meetings with financial & banking industry, institutional shareholders and other large investors and lenders
- **EEI-EEI Conference/Meetings:** attend critical national industry organization gatherings; Company often has leadership roles.
- **PER-Personal Travel**
- **AVI-Aviation Use:** repositioning of aircraft or crew for other flights or aircraft maintenance.
- **CNF-Conference/Convention**
- **TRN-Training**

Sincerely,



DEBRA J. PAULSON
MANAGER, RATE CASES

Attachments