# STATE OF SOUTH DAKOTA BEFORE THE SOUTH DAKOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF CHANGES TO THE STREET LIGHTING ENERGY SERVICE TARIFF TO PROVIDE A CUSTOMER-OWNED LIGHT EMITTING DIODE (LED) STREET LIGHTING RATE DOCKET NO. EL15-\_\_

**PETITION** 

Northern States Power Company, doing business as Xcel Energy moves the Commission for an order adopting the attached tariff sheet for the reasons stated hereunder.

#### I. REPORT OF PROPOSED TARIFF CHANGES

The information in this filing is consistent and being provided in accordance with the requirements of South Dakota Administrative Rule 20:10:13:26 – Report to Commission of proposed tariff schedule changes.

# (1) Name and Address of the Public Utility

Northern States Power Company doing business as: Xcel Energy 500 West Russell Sioux Falls, SD 57101-0988 (605) 339-8350

# Name, Address, and Telephone Number of Utility Attorney

Brett Koenecke May, Adam Gerdes Law firm 503 S. Pierre St. Pierre, SD 57501 (605) 224-8803

We request that all communications regarding this proceeding, including data requests, also be directed to:

SaGonna Thompson
Regulatory Administrator
Xcel Energy Services Inc.
414 Nicollet Mall
Minneapolis, MN 55401
Regulatory.Records@xcelenergy.com

#### (2) Section and Sheet Number of the Tariff Schedule

The following tariff sheets are proposed to be changed or added:

South Dakota Electric Rate Book – SDPUC No. 2 Street Lighting Energy Service Rate Code E31 Section No. 5 5<sup>th</sup> Revised Sheet No. 58

### (3) Description of the Tariff Change

The Company is proposing to add an LED fixture option to its Street Lighting Energy Service (Rate Code E31) contained in its Electric Rate Book to accommodate new street lighting technology.

# (4) Reason for the Change

The City of Sioux Falls has historically owned, maintained, and operated all of the street lighting equipment in the city. Many of the existing street light locations are billed using an unmetered monthly flat rate that is based on the estimated energy usage of the specific lighting technology at each location. City staff has informed the Company that they intend to begin replacing HPS (high pressure sodium) luminaires with newer LED fixtures. As the Company's tariff is specific to the MV (Mercury vapor) and HPS technologies and since the LED fixtures use significantly less energy, the Company believes adopting a new monthly flat rate to reflect the reduced energy consumption of the LED technology is consistent with providing efficient and reasonable service.

# (5) Present Rate

The existing rate for these unmetered luminaires is documented on the tariff sheet included in this filing as Attachment 2. The present tariff provides a monthly flat rate for five specific high pressure sodium lighting technologies and one Mercury vapor technology that are presently used by the City of Sioux Falls.

This petition would add an LED option to our non-metered, customer-owned street lighting rates for E31 Group 4 service.

#### (6) Proposed Rate

The proposed rate was designed to be consistent with the Street Lighting Energy Service- Metered rate (Rate Code E32), which uses the same rate design as the existing Rate Code E31 Group IV monthly flat lighting rates. The proposed Wattage rate is based on the E32 energy rate of \$0.05699 per kWh and the E12 monthly customer charge of \$5.00. The customer charge component is based on an assumption of 12 lighting units per meter, which recovers \$5.00 per year per lighting unit of fixed costs. Because this fixed cost component varies per light by Wattage level, the proposed per Watt amount was based on the weighted average of LED Wattage of HPS lighting units planned for replacement, of which 96 percent are comprised of the 100-Watt HPS lighting units. Attachment 1 to this petition includes more details on the calculations used to develop this rate. The resulting proposed rate is shown below:

Rate for any LED luminaire of any certified Wattage = LED Luminaire Wattage x \$0.0307 per Watt per Month

The Company proposes to continue to estimate a monthly kWh usage for these lighting fixtures and compute and include a fuel clause charge in the monthly billing statement as is presently done for the unmetered HPS fixtures.

# (7) Proposed Effective Date of Modified Rate

The Company would respectfully request the LED Street Lighting System Service Tariff option become effective and available on the date of a Commission Order approving this petition.

# (8) Approximation of Annual Amount of Increase or Decrease in Revenue

The Company estimates that the adoption of LED luminaires in Sioux Falls will reduce annual revenues to Xcel Energy by about \$120,000 per year.

# (9) Points Affected

This petition and these proposed changes will apply to all customers in South Dakota, however this change will principally affect street lighting within the City of Sioux Falls, SD as the City is moving forward with replacing existing high pressure sodium street lights with LED lights that operate at a significantly lower power level.

# (10) Estimation of the Number of Customers Whose Cost of Service Will be Affected and Annual Amounts of Either Increases or Decreases, or Both, in Cost of Service to Those Customers

This proposal principally affects only one customer known collectively as the City of Sioux Falls.

# (11) Statement of Facts, Expert Opinions, Documents and Exhibits to Support the Proposed Changes

Attachment 1 provides a calculation of the rates on a per Wattage basis of LED technologies converting the annual estimated energy use into a non-metered per street light rate.

Following is the tariff sheet containing the modifications necessary to implement the additional LED rate:

#### South Dakota Electric Rate Book – SDPUC No. 2

Street Lighting Energy Service Rate Code E31 Section No. 5 5<sup>th</sup> Revised Sheet No. 58

We provide the proposed tariff sheet in legislative format as Attachment 2 to this filing.

#### **CONCLUSION**

Xcel Energy respectfully requests that the Commission approve the Company's proposed tariff for a non-metered customer-owned LED street lighting rate as an addition to our existing Street Lighting Energy Service. We believe that approving the proposed tariff changes to this lighting tariff is necessary in order to accommodate the adoption of LED street lighting in our South Dakota communities, and to provide adequate, efficient and reasonable service to our customers.

Dated: October 15, 2015

Northern States Power Company