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June 30, 2010

Ms. Patricia Van Gerpen, Executive Director
South Dakota Public Utilities Commission
State Capitol Building
500 East Capitol Avenue
Pierre, South Dakota 57501-5070

Re: RM10-001 In the Matter of the Request to Amend Rules Regarding ARSD
Chapter 20:10:17 Gas and Electric Customer Billing.

Dear Ms. Van Gerpen:

In response to the request by Commission Staff of May 5, 2010, Xcel Energy provides the following reply to the 33 questions posed in this matter.

If anyone has any questions, please call me at 339-8350

Sincerely,

A handwritten signature in black ink that reads 'J Wilcox'.

Jim Wilcox

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 1-1

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Slow or fast meters: ARSD 20:10:17:06 and 20:10:17:07

(1-1) How many slow or fast meter errors, in the past 5 years, have you discovered?

Please provide a list by year and the corresponding length of time the meter reading was in error.

Response:

In the years 2005-2010, the electrical meters previously installed in South Dakota and tested in the NSPM Meter labs have resulted in 22 meters being identified as operating outside the industry standard + or – 2% when tested. Exhibit 1-1 following depicts this record.

Preparer: Linda L. Zeits

Title: Manager, Planning and Performance – Metering

Department: Metering

Telephone: 651-265-7122

Date: June 30, 2010

Meters Testing Outside the Industry Standard of +/- 2%

Year	Meter number (last 4 digits)	Test Date	Length of time reading in error
2005	7593	10/6/2005	Unknown Vacant account
	5727	11/15/2005	Unknown, however no noticable increase in usage post meter exchange Vacant Account
	4787	4/5/2005	Unknown, however no noticable increase in usage post meter exchange
	7262	10/25/2005	Unknown, however slight increase in usage post meter exchange
2006	1232	8/28/2006	Unknown
	5529	9/12/2006	Unknown
	5989	10/13/2006	Unknown, however no noticable increase in usage post meter exchange
	2125	10/26/2006	Unknown
	6191	11/14/2006	Unknown
	9357	8/28/2006	Unknown
2007	7808	5/29/2007	Unknown probably from 2005
	7827	6/28/2007	Unknown
	1031	10/3/2007	Unknown, however no noticable increase in usage post meter exchange
	5521	10/4/2007	Unknown, however no noticable increase in usage post meter exchange
	7838	10/17/2007	Unknown
	5177	5/29/2007	Unknown
	0310	12/13/2007	Unknown, however no noticable increase in usage post meter exchange
2009	9976	2/6/2009	Unknown
	4210	11/18/2009	Unknown
	9429	11/20/2009	Unknown, however no noticable increase in usage post meter exchange
2010	0521	4/14/2010	Unknown
	4203	1/14/2010	Unknown

Total **22 Meters**

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 1-2

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Slow or fast meters: ARSD 20:10:17:06 and 20:10:17:07

(1-2) Of those how many were fast? How many slow?

Response:

In the years 2005-2010, NSPM Meter lab tests resulted in possibly 4 fast and 18 slow electrical meters being identified as operating outside the industry standard + or – 2% when tested. Exhibit 1-2 following depicts this record.

Preparer: Linda L. Zeits

Title: Manager, Planning and Performance – Metering

Department: Metering

Telephone: 651-265-7122

Date: June 30, 2010

Meters Testing Outside the Industry Standard +/- 2%

Listing of meters testing fast or slow

Year	Meter number (last 4 digits)	Test Date	Test Results (Fast or Slow)
2005	7593	10/6/2005	Fast
	5727	11/15/2005	Fast
	4787	4/5/2005	Slow
	7262	10/25/2005	Slow
2006	1232	8/28/2006	Slow
	5529	9/12/2006	Slow
	5989	10/13/2006	Slow
	2125	10/26/2006	Slow
	6191	11/14/2006	Slow
	9357	8/28/2006	Slow
2007	7808	5/29/2007	Slow
	7827	6/28/2007	Slow
	1031	10/3/2007	Slow
	5521	10/4/2007	Slow
	7838	10/17/2007	Slow
	5177	5/29/2007	Fast*
	0310	12/13/2007	Slow
2009	9976	2/6/2009	Slow
	4210	11/18/2009	Slow
	9429	11/20/2009	Slow
2010	0521	4/14/2010	Slow
	4203	1/14/2010	Fast*

Total 22 Meters

* An after the fact review determined that these tests had not been performed according to standard and therefore the results were not conclusive.

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 1-3

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Slow or fast meters: ARSD 20:10:17:06 and 20:10:17:07

(1-3) How was each error discovered?

Response:

In the years 2005-2010, the 22 meters discovered to be outside the industry standard of + or – 2% were discovered through one of the following means:

- The Random Sample Testing Program,
- A Customer Request,
- A Company Requests due to a suspected automated meter reading (AMR) issue resulting from internal proactive data checks
- Company Requests due to a suspected equipment issue resulting from internal proactive data checks or confirmed equipment issues
- The Periodic Sample Testing Program or
- Meter Removal due to Building Demolition

Exhibit 1-3 following provides more detail about how each error was discovered.

Preparer: Linda L. Zeits

Title: Manager, Planning and Performance – Metering

Department: Metering

Telephone: 651-265-7122

Date: June 30, 2010

Meters Testing Outside the Industry Standard +/- 2%

Year	Meter number (last 4 digits)	Means of Error Discovery
2005	7593	Random Sample Test
	5727	Random Sample Test
	4787	Random Sample Test
	7262	Random Sample Test
2006	1232	Discontinued Service/Random Test
	5529	Random Sample Test
	5989	Customer Request
	2125	Random Sample Test
	6191	Random Sample Test
	9357	Random Sample Test
2007	7808	Periodic Sample Test
	7827	Company Request/Suspected AMR Issue
	1031	Company Request/Suspected AMR Issue
	5521	Company Request/Equipment Issue
	7838	Building Demolition
	5177	Periodic Sample Test
	0310	Company Request/Suspected AMR Issue
2009	9976	Company Request/Equipment Issue
	4210	Company Request/Equipment Issue
	9429	Periodic Sample Test
2010	0521	Company Request
	4203	Company Request
Total	22 Meters	

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 1-4

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Slow or fast meters: ARSD 20:10:17:06 and 20:10:17:07

(1-4) What were the total monetary values of those errors.

Response:

In the years 2005-2010, the financial impact of the 22 fast and slow meters was \$0.00. The degradation that causes the meter to register either fast or slow is a process that happens over an extended period of time and may not be readily noticeable in the meter reading consumption values. As such, determining the exact point in time when the deployed meter exceeded the + or – 2% industry standard is often indeterminable. Accordingly, the Company does not rebill its customers for these slow meters. While we normally refund for fast meter tests, the four fast meters in this analysis were not refunded as two of them were for premises that had been vacant and the other two are uncertain as the tests were inconclusive. Exhibit 1-4 following lists the monetary value of each error that was discovered.

Preparer: Linda L Zeits

Title: Manager, Planning and Performance – Metering

Department: Metering

Telephone: 651-265-7122

Date: June 30, 2010

Meters Testing Outside the Industry Standard +/- 2%

The Monetary Value of Errors

Year	Meter number (last 4 digits)	Monetary Value of Error
2005	7593	\$0.00
	5727	\$0.00
	4787	\$0.00
	7262	\$0.00
2006	1232	\$0.00
	5529	\$0.00
	5989	\$0.00
	2125	\$0.00
	6191	\$0.00
	9357	\$0.00
2007	7808	\$0.00
	7827	\$0.00
	1031	\$0.00
	5521	\$0.00
	7838	\$0.00
	5177	\$0.00
	0310	\$0.00
2009	9976	\$0.00
	4210	\$0.00
	9429	\$0.00
2010	0521	\$0.00
	4203	\$0.00
Total	22 Meters	

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 1-5

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Slow or fast meters: ARSD 20:10:17:06 and 20:10:17:07

(1-5) Please detail how each error listed above was resolved.

Response:

During the years 2005-2010, all 22 incidents of fast or slow electrical meters deployed in South Dakota were resolved by exchanging the meters. Exhibit 1-5 following lists the method used to resolve each meter error.

Preparer: Linda L. Zeits

Title: Manager, Planning and Performance – Metering

Department: Metering

Telephone: 651-265-7122

Date: June 30, 2010

Meters Testing Outside the Industry Standard +/- 2%

Error Resolution

Year	Meter number (last 4 digits)	Test Date	Error Resolution	
			Meter Exchange (Yes or No)	Customer Rebilled (Yes or No)
2005	7593	10/6/2005	Yes	No
	5727	11/15/2005	Yes	No
	4787	4/5/2005	Yes	No
	7262	10/25/2005	Yes	No
2006	1232	8/28/2006	Yes	No
	5529	9/12/2006	Yes	No
	5989	10/13/2006	Yes	No
	2125	10/26/2006	Yes	No
	6191	11/14/2006	Yes	No
	9357	8/28/2006	Yes	No
2007	7808	5/29/2007	Yes	No
	7827	6/28/2007	Yes	No
	1031	10/3/2007	Yes	No
	5521	10/4/2007	Yes	No
	7838	10/17/2007	Yes	No
	5177	5/29/2007	Yes	No
	0310	12/13/2007	Yes	No
2009	9976	2/6/2009	Yes	No
	4210	11/18/2009	Yes	No
	9429	11/20/2009	Yes	No
2010	0521	4/14/2010	Yes	No
	4203	1/14/2010	Yes	No
Total	22 Meters			

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 1-6

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Slow or fast meters: ARSD 20:10:17:06 and 20:10:17:07

(1-6) Do you believe SDCL 15-2-13 (6 year contract statute of limitations) limits the refund due a customer if there is a 2% fast or more error discovered?

Response:

SDCL § 15-2-13 provides a six-year statute of limitations for an action upon a contract unless a different limitation is prescribed by statute. South Dakota Admin. R. 20:10:17:06-07 provide that the refund period may extend to the time the date of the error may be fixed with reasonable certainty. However, the statutes implemented by the rules do not address the timing issue. The Company believes that the six-year period prescribed by SDCL 15-2-13 is an adequate limitation on the refund period.

Preparer: Jim Wilcox

Title: Manager of Government and Regulatory Affairs

Department: Xcel Energy South Dakota

Telephone: 339-8350

Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 1-7

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Slow or fast meters: ARSD 20:10:17:06 and 20:10:17:07

(1-7) If the error date is determined with “reasonable certainty”, do you believe SDCL 15-2-13 limits the time you may back-bill and receive payment for a slow meter error?

Response:

SDCL § 15-2-13 provides a six-year statute of limitations for an action upon a contract unless a different limitation is prescribed by statute. South Dakota Admin. R. 20:10:17:06-07 provide that the time period for which the Company may go back and charge a customer for underbilled amounts may extend to that time the date of the error may be fixed with reasonable certainty. However, the statutes implemented by the rules do not address the timing issue. The Company believes that the six-year period prescribed by SDCL 15-2-13 is an adequate limitation on the time period.

Preparer: Jim Wilcox

Title: Manager of Government and Regulatory Affairs

Department: Xcel Energy South Dakota

Telephone: 339-8350

Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 2-1

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Meter failing to register: ARSD 20:10:17:08

(2-1) Has it happened, in the past 5 years, where a meter failed to register? Please provide a list by year.

Response:

Yes. In the last 5 years, there have been 109 meters installed in South Dakota that have been confirmed to have a failure to register. Exhibit 2-1 following lists each of the meters that failed to register.

Preparer: Wayne Stifter

Title: Manager, Billing Operations

Department: Billing

Telephone: 651-639-4506

Date: June 30, 2010

South Dakota Deployed Meters: Failure to Register

Year	Field Remedied Errors <i>Premise Number (last 4 digits)</i>	Lab Test Identified <i>Meter Number (last 4 digits)</i>	Total Meters by Year
2005		7254	
		5964	
		1983	3
2006	6937	0825	
		4113	
		8577	
		9112	
		2915	
		9952	
		4153	
		5407	
		2269	
		8103	
		9839	
	1246	13	
2007	2237	9107	
	0026	2844	
	6263	8577	
	4495	7401	
	0115	9805	
	2947	2790	
	6376	7584	
	5285	2638	
	9622	8268	
		8641	
		1231	
		2148	
		6693	
		0278	
	9835		
	8000		
	8752		
	2642		
	2895	28	
2008	2065	2633	
	7030	4794	
	7310	2627	
	9634	2590	
	4008	3266	
	9069	11	

Year	Field Remedied Errors <i>Premise Number (last 4 digits)</i>	Lab Test Identified <i>Meter Number (last 4 digits)</i>	Total Meters by Year
2009	6138	1855	
	6869	7729	
	7492	2630	
	0955	2593	
	3176	5643	
	6846	6745	
	7829	0776	
	6598	3206	
	4268	7789	
	1998	4034	
	0612	1679	
	1480	2956	
	8762	4070	
		3240	
		9477	
		6507	
	3724		
	2629		
	1022		
	1039		
	6573		
	1709	35	
2010	1998	1500	
	7941	6691	
	7053	6747	
	9284	2596	
	2001	2580	
	6699	2596	
	0413	2167	
	9571	4688	
	1245	2585	19
	1311		
2005 - 2010 Total meters identified - failing to Register			109

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 2-2

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Meter failing to register: ARSD 20:10:17:08

(2-2) How were the failures discovered?

Response:

The 109 meters that were confirmed to have failed to register between 2005 and 2010 were discovered either during an investigation by meter field personnel or during tests conducted in the Electric Meter lab. There were 38 meters resulting from the field investigations and 71 discovered through lab testing.

The meter failures are identified by one of three methods: 1) Internal Reporting through Zero Consumption Reports (a report that shows no use on the meter) which results in a field order being issued for field verification; 2) field personnel performing a meter maintenance activity unrelated to the issue of a meter failing to register; or 3) a customer calling the company expressing a concern about their billed consumption.

Exhibit 2-2a following lists those meter errors discovered through a field investigation. Exhibit 2-2b lists those meter errors discovered through tests performed in the meter lab.

Preparer: Linda L. Zeits

Title: Manager, Planning and Performance – Metering

Department: Metering

Telephone: 651-265-7122

Date: June 30, 2010

Errors Discovered Through a Field Investigation

Year	Premise Number (4 digits)	Means of Error Discovery
2006	6937	Company Requested Field Check
	1 Total	
2007	2237	Company Requested Field Check
	0026	Company Requested Field Check
	6263	Company Requested Field Check
	4495	Company Requested Field Check
	0115	Company Requested Field Check
	2947	Company Requested Field Check
	6376	Company Requested Field Check
	5285	Company Requested Field Check
	9622	Company Requested Field Check
	9 Total	
2008	2065	Company Requested Field Check
	7030	Company Requested Field Check
	7310	Company Requested Field Check
	9634	Company Requested Field Check
	4008	Company Requested Field Check
	5 Total	
2009	6138	Company Requested Field Check
	6869	Company Requested Field Check
	7492	Company Requested Field Check
	0955	Company Requested Field Check
	3176	Company Requested Field Check
	6846	Company Requested Field Check
	7829	Company Requested Field Check
	6598	Company Requested Field Check
	4268	Company Requested Field Check
	1998	Company Requested Field Check
	0612	Company Requested Field Check
	1480	Company Requested Field Check
	8762	Company Requested Field Check
	13 Total	
2010	1998	Company Requested Field Check
	7941	Company Requested Field Check
	7053	Company Requested Field Check
	9284	Company Requested Field Check
	2001	Company Requested Field Check
	6699	Company Requested Field Check
	0413	Company Requested Field Check
	9571	Company Requested Field Check
	1245	Company Requested Field Check
	1311	Company Requested Field Check
	10 Total	
2006-2010		
Total	38 Meters	

Errors Identified through Tests Performed in the Meter Lab

Year	Meter (last 4 digits)	Test Date	Meter Removal Date	Reason Meter Removed (Basis for Exchange)
2005				
	7254	10/3/2005	7/18/2005	Selective/Random/Routine Test
	5964	10/6/2005	1/17/2005	Defective/dead meter
3 Meters	1983	1/23/2006	11/9/2005	Selective/Random/Routine Test
2006	0825	4/28/2006	3/7/2006	Equipment Failure
	4113	4/28/2006	3/28/2006	Company Request/Field Check
	8577	5/8/2006	4/4/2006	Selective/Random/Routine Test
	9112	5/23/2006	4/18/2006	Damaged in the Field
	2915	8/7/2006	6/23/2006	Equipment Failure
	9952	8/28/2006	7/18/2006	Equipment Failure
	4153	8/28/2006	7/18/2006	Company Request/Field Check
	5407	10/2/2006	7/19/2006	Equipment Failure
	2269	10/18/2006	9/1/2006	Customer Request/Billing
	8103	11/13/2006	10/25/2006	Equipment Failure
	9839	11/17/2006	11/27/2006	Fire at the Premise
	1246	12/4/2006	10/31/2006	Equipment Failure
12 Meters				
2007	9107	2/21/2007	11/16/2006	Broken Dial
	2844	2/21/2007	1/4/2007	Company Request/Field Check
	8577	4/5/2007	2/23/2007	Damaged in the Field
	7401	4/5/2007	2/28/2007	Equipment Failure
	9805	4/26/2007	1/26/2007	Equipment Failure
	2790	6/28/2007	3/26/2007	Equipment Failure
	7584	7/10/2007	4/16/2007	Equipment Failure
	2638	7/20/2007	6/11/2007	Damaged in the Field
	8268	7/26/2007	4/20/2007	Company Request/Field Check
	8641	8/3/2007	6/28/2007	Equipment Failure
	1231	8/3/2007	7/9/2007	Fire Damage
	2148	10/1/2007	8/22/2007	Company Request/Field Check
	6693	10/4/2007	8/14/2007	Defective/dead meter
	0278	10/4/2007	8/16/2007	Equipment Failure
	9835	12/11/2007	4/2/2007	Customer Request/Billing
	8000	12/11/2007	9/27/2007	Other - Return Miscellaneous
	8752	12/13/2007	7/6/2007	Damaged in the Field
	2642	12/13/2007	10/2/2007	Damaged in the Field
	2895	12/13/2007	10/25/2007	Damaged in the Field
19 Meters				
2008	2633	1/7/2008	11/7/2007	Damaged in the Field
	4794	2/8/2008	11/29/2007	Equipment Failure
	2627	3/4/2008	12/19/2007	Damaged in the Field
	2590	5/2/2008	2/26/2008	Equipment Failure
	3266	5/14/2008	12/10/2007	Damaged in the Field
	9069	10/7/2008	7/23/2008	Equipment Failure
6 Meters				

Errors Identified through Tests Performed in the Meter Lab

Year		Test Date	Meter Removal Date	Reason Meter Removed (Basis for Exchange)
2009	1855	1/23/2009	12/4/2008	Customer Request/Billing
	7729	2/23/2009	12/2/2008	Fire Damage
	2630	5/19/2009	2/19/2009	Damaged in the Field
	2593	6/2/2009	1/13/2009	Damaged in the Field
	5643	6/2/2009	4/3/2009	Equipment Failure
	6745	6/2/2009	4/3/2009	Equipment Failure
	0776	6/3/2009	4/17/2009	Equipment Failure
	3206	6/3/2009	2/25/2009	Equipment Failure
	7789	6/3/2009	3/6/2009	Equipment Failure
	4034	6/3/2009	4/3/2009	Equipment Failure
	1679	6/3/2009	4/14/2009	Company Request/Field Check
	2956	6/15/2009	3/19/2009	Equipment Failure
	4070	6/15/2009	3/25/2009	Company Request/Field Check
	3240	6/19/2009	2/25/2009	Equipment Failure
	9477	7/29/2009	3/12/2009	Equipment Failure
	6507	8/27/2009	6/8/2009	Equipment Failure
	3724	9/29/2009	5/5/2009	Equipment Failure
	2629	10/5/2009	8/3/2009	Equipment Failure
	1022	10/16/2009	7/17/2009	Damaged in the Field
	1039	10/26/2009	8/21/2009	Equipment Failure
	6573	10/29/2009	10/20/2009	Selective/Random/Routine Test
	1709	12/31/2009	10/20/2009	Company Request
<i>22 Meters</i>				
2010	1500	3/8/2010	11/18/2009	Company Request
	6691	3/8/2010	10/19/2009	Broken Dial
	6747	3/8/2010	11/4/2009	Equipment Failure
	2596	3/8/2010	11/20/2009	Company Request
	2580	3/8/2010	11/20/2009	Company Request
	2596	3/8/2010	11/20/2009	Company Request
	2167	4/1/2010	12/1/2009	Company Request
	4688	4/7/2010	12/14/2009	Damaged in the Field
	2585	4/7/2010	12/29/2009	Equipment Failure
<i>9 Meters</i>				

2005-2010

Total 71 Total Meters

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 2-3

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Meter failing to register: ARSD 20:10:17:08

(2-3) Please list the total monetary value of each failure and the corresponding length of time the meter reading was in error.

Response:

Between 2006 and 2010, the total monetary value of the 38 meters where field investigations confirmed the failure to register is \$44,064.01. The meters that were confirmed in the lab as failing to register are rebilled if the date of the failure can be determined. However as in the case of the 71 found through lab testing in South Dakota, since the failure date cannot be determined with reasonable certainty, rebilling did not occur. Only when the date of the meter error is determined with reasonable certainty, is customer billing adjusted. Exhibit 2-3 following details the monetary value of those 38 meters where the failure was determined with reasonable certainty and the customers were rebilled.

Preparer: Linda L. Zeits

Title: Manager, Planning and Performance – Metering

Department: Metering

Telephone: 651-265-2711

Date: June 30, 2010

Identified Errors Remedied Through a Field Investigation - monetary value

Year	Premise Number (last 4 digits)	Start Date of Meter Error	Meter Exchange Date	Length of reading error (days)	Date Rebill Issued	Monetary Value of Error (\$\$\$\$)
2006	6937	8/8/2006	11/9/2006	93	11/13/2006	\$ 357.15
	1 Total					\$ 357.15
2007	2237	05/01/07	07/02/07	62	07/05/07	\$ 165.77
	0026	12/25/06	08/31/07	249	09/24/07	\$ 25,667.31
	6263	09/06/07	11/08/07	63	11/16/07	\$ 126.23
	4495	12/5/2006	2/24/2007	81	2/28/2007	\$ 146.95
	0115	4/20/2006	2/8/2007	294	3/21/2007	\$ 710.51
	2947	10/16/2006	3/6/2007	141	3/7/2007	\$ 348.68
	6376	2/5/2007	4/20/2007	74	4/27/2007	\$ 125.24
	5285	2/15/2007	3/28/2007	41	3/29/2007	\$ 86.59
	9622	5/10/2006	9/24/2007	502	10/15/2007	\$ 784.97
	9 Total					\$ 28,162.25
2008	2065	10/23/2007	3/25/2008	154	03/31/08	\$ 2,706.14
	7030	1/4/2008	4/18/2008	105	04/21/08	\$ 64.96
	7310	5/24/2008	7/25/2008	62	08/08/08	\$ 42.28
	9634	1/28/2008	7/10/2008	164	8/4/2008	\$ 420.50
	4008	6/24/2008	9/4/2008	72	10/27/2008	\$ 175.95
	5 Total					\$ 3,409.83
2009	6138	9/15/2009	11/17/2009	63	12/11/09	\$ 153.00
	6869	7/2/2008	2/25/2009	238	3/2/2009	\$ 728.53
	7492	5/7/2008	3/5/2009	302	5/27/2009	\$ 724.14
	0955	3/11/2009	4/17/2009	37	5/5/2009	\$ 25.87
	3176	6/3/2008	3/18/2009	288	4/7/2009	\$ 936.84
	6846	8/3/2008	3/12/2009	221	4/1/2009	\$ 1,140.18
	7829	7/2/2008	2/25/2009	238	3/5/2009	\$ 966.64
	6598	2/4/2009	4/15/2009	70	4/27/2009	\$ 123.78
	4268	6/9/2008	3/12/2009	276	3/26/2009	\$ 483.28
	1998	8/5/2009	12/11/2009	128	1/12/2010	\$ 516.25
	0612	9/24/2009	11/25/2009	62	11/30/2009	\$ 220.78
	1480	9/9/2009	12/29/2009	111	1/8/2010	\$ 416.41
	8762	4/1/2008	3/16/2009	349	4/2/2009	\$ 3,447.07
	13 Total					\$ 9,882.77
2010	1998	8/5/2009	12/11/2009	128	01/12/10	\$ 455.39
	7941	11/10/2009	1/18/2010	69	01/21/10	\$ 106.16
	7053	1/18/2010	3/24/2010	65	05/12/10	\$ 121.54
	9284	1/18/2010	3/24/2010	65	05/12/10	\$ 67.57
	2001	1/17/2010	3/24/2010	66	05/12/10	\$ 79.54
	6699	1/19/2010	4/19/2010	90	05/21/10	\$ 63.28
	0413	1/18/2010	3/24/2010	65	5/14/2010	\$ 131.20
	9571	1/18/2010	3/24/2010	65	5/12/2010	\$ 111.52
	1245	1/18/2010	3/24/2010	65	5/12/2010	\$ 163.14
	1311	8/5/2009	5/4/2010	272	5/11/2010	\$ 952.67
	10 Total					\$ 2,252.01
2006-2010	Total					\$ 44,064.01

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 2-4

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Meter failing to register: ARSD 20:10:17:08

(2-4) Please detail how each failure was resolved.

Response:

The resolution to a meter failing to register is to dispatch a field meter technician to complete a meter exchange. In each case, the 109 meters confirmed to have failed to register in South Dakota between 2005 and 2010, a meter exchange resolved the issue. In the case of the 38 confirmed via field investigation, customer rebilling was also a component of the resolution. Exhibit 2-4a following lists those 38 meters that were rebilled. Exhibit 2-4b following lists the 71 meters confirmed by lab tests.

Preparer: Linda L. Zeits

Title: Manager, Planning and Performance – Metering

Department: Metering

Telephone: 651-265-2711

Date: June 30, 2010

Identified Errors Remedied Through a Field Investigation

Year	Premise Number (4 digits)	Meter Exchange Date	Date Rebill Issued	Means of Resolution	
				Meter Exchange (Yes or No)	Customer Rebilled (Yes or No)
2006	6937	11/9/2006	11/13/2006	Yes	Yes
	1 Total				
2007	2237	07/02/07	07/05/07	Yes	Yes
	0026	08/31/07	09/24/07	Yes	Yes
	6263	11/08/07	11/16/07	Yes	Yes
	4495	2/24/2007	2/28/2007	Yes	Yes
	0115	2/8/2007	3/21/2007	Yes	Yes
	2947	3/6/2007	3/7/2007	Yes	Yes
	6376	4/20/2007	4/27/2007	Yes	Yes
	5285	3/28/2007	3/29/2007	Yes	Yes
	9622	9/24/2007	10/15/2007	Yes	Yes
	9 Total				
2008	2065	3/25/2008	03/31/08	Yes	Yes
	7030	4/18/2008	04/21/08	Yes	Yes
	7310	7/25/2008	08/08/08	Yes	Yes
	9634	7/10/2008	8/4/2008	Yes	Yes
	4008	9/4/2008	10/27/2008	Yes	Yes
	5 Total				
2009	6138	11/17/2009	12/11/09	Yes	Yes
	6869	2/25/2009	3/2/2009	Yes	Yes
	7492	3/5/2009	5/27/2009	Yes	Yes
	0955	4/17/2009	5/5/2009	Yes	Yes
	3176	3/18/2009	4/7/2009	Yes	Yes
	6846	3/12/2009	4/1/2009	Yes	Yes
	7829	2/25/2008	3/5/2009	Yes	Yes
	6598	4/15/2009	4/27/2009	Yes	Yes
	4268	3/12/2009	3/26/2009	Yes	Yes
	1998	12/11/2009	1/12/2010	Yes	Yes
	0612	11/25/2009	11/30/2009	Yes	Yes
	1480	12/29/2009	1/8/2010	Yes	Yes
	8762	3/16/2009	4/2/2009	Yes	Yes
	13 Total				
2010	1998	12/11/2009	01/12/10	Yes	Yes
	7941	1/18/2010	01/21/10	Yes	Yes
	7053	3/24/2010	05/12/10	Yes	Yes
	9284	3/24/2010	05/12/10	Yes	Yes
	2001	3/24/2010	05/12/10	Yes	Yes
	6699	4/19/2010	05/21/10	Yes	Yes
	0413	3/24/2010	5/14/2010	Yes	Yes
	9571	3/24/2010	5/12/2010	Yes	Yes
	1245	3/24/2010	5/12/2010	Yes	Yes
	1311	5/4/2010	5/11/2010	Yes	Yes
	10 Total				
2006-2010	Total				
	38 Meters				

**Errors resolved following discovery through
 Tests Performed in the Meter Lab**

Year	Meter (4 digits)	Test Date	Meter Removal Date
2005			
	7254	10/3/2005	7/18/2005
	5964	10/6/2005	1/17/2005
3 Meters	1983	1/23/2006	11/9/2005
2006	0825	4/28/2006	3/7/2006
	4113	4/28/2006	3/28/2006
	8577	5/8/2006	4/4/2006
	9112	5/23/2006	4/18/2006
	2915	8/7/2006	6/23/2006
	9952	8/28/2006	7/18/2006
	4153	8/28/2006	7/18/2006
	5407	10/2/2006	7/19/2006
	2269	10/18/2006	9/1/2006
	8103	11/13/2006	10/25/2006
	9839	11/17/2006	11/27/2006
	1246	12/4/2006	10/31/2006
12 Meters			
2007	9107	2/21/2007	11/16/2006
	2844	2/21/2007	1/4/2007
	8577	4/5/2007	2/23/2007
	7401	4/5/2007	2/28/2007
	9805	4/26/2007	1/26/2007
	2790	6/28/2007	3/26/2007
	7584	7/10/2007	4/16/2007
	2638	7/20/2007	6/11/2007
	8268	7/26/2007	4/20/2007
	8641	8/3/2007	6/28/2007
	1231	8/3/2007	7/9/2007
	2148	10/1/2007	8/22/2007
	6693	10/4/2007	8/14/2007
	0278	10/4/2007	8/16/2007
	9835	12/11/2007	4/2/2007
	8000	12/11/2007	9/27/2007
	8752	12/13/2007	7/6/2007
	2642	12/13/2007	10/2/2007
	2895	12/13/2007	10/25/2007
19 Meters			
2008	2633	1/7/2008	11/7/2007
	4794	2/8/2008	11/29/2007
	2627	3/4/2008	12/19/2007
	2590	5/2/2008	2/26/2008
	3266	5/14/2008	12/10/2007
	9069	10/7/2008	7/23/2008
6 Meters			

**Errors resolved following discovery through
 Tests Performed in the Meter Lab**

Year	Meter (4 digits)	Test Date	Meter Removal Date
2009	1855	1/23/2009	12/4/2008
	7729	2/23/2009	12/2/2008
	2630	5/19/2009	2/19/2009
	2593	6/2/2009	1/13/2009
	5643	6/2/2009	4/3/2009
	6745	6/2/2009	4/3/2009
	0776	6/3/2009	4/17/2009
	3206	6/3/2009	2/25/2009
	7789	6/3/2009	3/6/2009
	4034	6/3/2009	4/3/2009
	1679	6/3/2009	4/14/2009
	2956	6/15/2009	3/19/2009
	4070	6/15/2009	3/25/2009
	3240	6/19/2009	2/25/2009
	9477	7/29/2009	3/12/2009
	6507	8/27/2009	6/8/2009
	3724	9/29/2009	5/5/2009
	2629	10/5/2009	8/3/2009
	1022	10/16/2009	7/17/2009
	1039	10/26/2009	8/21/2009
	6573	10/29/2009	10/20/2009
	1709	12/31/2009	10/20/2009
22 Meters			
2010	1500	3/8/2010	11/18/2009
	6691	3/8/2010	10/19/2009
	6747	3/8/2010	11/4/2009
	2596	3/8/2010	11/20/2009
	2580	3/8/2010	11/20/2009
	2596	3/8/2010	11/20/2009
	2167	4/1/2010	12/1/2009
	4688	4/7/2010	12/14/2009
	2585	4/7/2010	12/29/2009
9 Meters			

2005-2010

Total 71 Total Meters

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff Data Request No. 2-5

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Meter failing to register: ARSD 20:10:17:08

(2-5) Do you believe SDCL 15-2-13 limits the utilities ability to back-bill if the meter fails to register?

Response:

SDCL § 15-2-13 provides a six-year statute of limitations for an action upon a contract unless a different limitation is prescribed by statute. South Dakota Admin. R. 20:10:17:09 provides that the time period to recover an undercharge may extend to the time the date of the error may be fixed with reasonable certainty. However, the statutes implemented by the rules do not address the timing issue. The Company believes that the six-year period prescribed by SDCL 15-2-13 is an adequate limitation on the time period to recover an undercharge.

Preparer: Jim Wilcox

Title: Manager of Government and Regulatory Affairs

Department: Xcel Energy South Dakota

Telephone: 339-8350

Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff Data Request No. 3-1

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Other meter errors: ARSD 20:10:17:09

(3-1) How many meter errors of this type, in the past 5 years, have you discovered?
Please provide a list (or all over and under billing) by year.

Response:

In the years 2006 to 2010, the electrical meters installed in South Dakota have resulted in 92 meters classified as a switched meter and 2 meters being identified as having an incorrect meter multiplier applied. Exhibits 3-1a and 3-1b detail these meter errors.

Preparer: Wayne Stifter

Title: Manager, Billing Operations

Department: Billing

Telephone: 651-639-4506

Date: June 30, 2010

Switched Meters Deployed in South Dakota

	Premise Number (s) (4 digits)
2006	2929 & 0899 4508 & 3643 9055 & 0064 0615 & 9395 7324 & 3217 0847 & 4443 1646 & 0946
14 Total Meters	
2007	8818 & 8817 2463 2481 2464 All within one apartment complex; all verified on same date 2483 2484 2485 2465 2486 8993 & 6859 0660 & 3138 0009 & 8730
16 Total Meters	
2008	1620 & 3421 9833 & 9834 9835 & 9832 9036 & 9063 6684 & 5171 1167 & 1170 1171 & 1166 9169 & 5639 1168 & 1169 1164 & 1173 1165 & 1175 1162 & 1174 1162 & 1174 0818 & 6077 7425 & 1520 7921 & 8616 & 7355 6564 & 1479
33 Total Meters	
2009	5049 & 5491 8602 & 3859 4734 & 5100 5052 & 5055 5052 & 5055 4856 & 4058 5053 & 5054 6902 & 6904 7086 & 9191 7518 & 0077 0357 & 6102 5102 & 8433 6132 & 8748
24 Total Meters	
2010	3125 & 3536 6762 & 0229 & 2399
5 Total Meters	
2006 - 2010	92 Total Switched Meters

Meter Multiplier Issues for SD

Premise Number (4 digits)

2008	3504
	7339

2 Total Meters

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff Data Request No. 3-2

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Other meter errors: ARSD 20:10:17:09

(3-2) Please detail the nature of the error and explain how each was discovered?

Response:

Most switched meters are initially identified by a call from a customer who believes his bill is inaccurate. During the call, the customer is asked a series of questions in order to ascertain the possibility of a switched meter. If a switched meter is suspected, a work order is issued to field meter personnel to verify the existence of a switched meter. A switched meter occurs when the internal wiring of the customer is connected to the incorrect meter by the customer's electrician. Switched meters are more likely to occur in either apartment complexes or commercial sites where multiple businesses are operating, such as a strip mall. Xcel Energy generally learns of a switched meter when the customer calls to inquire about the accuracy of their bill. On occasion an Xcel Energy field employee will discover a switched meter when working on-site for another unrelated reason.

In the case of a meter multiplier error, the issue can be identified from a customer call, a billing analysis, or an audit conducted by field personnel. A meter/premise with an incorrect meter multiplier is the result of the instrument transformer ratio being incorrectly entered as the billing determinant.

Exhibits 3-2a and 3-2b depicts how each was discovered.

Preparer: Wayne Stifter
Title: Manager, Billing Operations
Department: Billing
Telephone: 651-639-4506
Date: June 30, 2010

Switched Meters Deployed in South Dakota - means of discovery

	Premise Number (last 4 digits)	Means of Discovery	
2006	2929 & 0899	questioned by customer/ field verified	
	4508 & 3643	found by meter tech	
	9055 & 0064	questioned by cust, verified in field	
	0615 & 9395	questioned by cust, verified in field	
	7324 & 3217	questioned by cust, verified in field	
	0847 & 4443	questioned by cust, verified in field	
	1646 & 0946	questioned by cust, verified in field	
14 Total Meters			
2007	8818 & 8817	questioned by customer/ field verified	
	2463	questioned by customer/ field verified	
	2481	questioned by customer/ field verified	
	2464	questioned by customer/ field verified	
	2483	questioned by customer/ field verified	
	2484	questioned by customer/ field verified	
	2485	questioned by customer/ field verified	
	2465	questioned by customer/ field verified	
	2486	questioned by customer/ field verified	
	8993 & 6859	questioned by customer/ field verified	
	0660 & 3138	questioned by customer/ field verified	
	0009 & 8730	questioned by customer/ field verified	
	16 Total Meters		
2008	1620 & 3421	questioned by customer/ field verified	
	9833 & 9834	questioned by customer/ field verified	
	9835 & 9832	questioned by customer/ field verified	
	9036 & 9063	questioned by customer/ field verified	
	6684 & 5171	questioned by customer/ field verified	
	1167 & 1170	questioned by customer/ field verified	
	1171 & 1166	questioned by customer/ field verified	
	9169 & 5639	questioned by customer/ field verified	
	1168 & 1169	questioned by customer/ field verified	
	1164 & 1173	questioned by customer/ field verified	
	1165	questioned by customer/ field verified	
	1175	questioned by customer/ field verified	
	1162 & 1174	questioned by customer/ field verified	
	0818 & 6077	questioned by customer/ field verified	
	7425 & 1520	questioned by customer/ field verified	
	7921 & 8616 & 7355	questioned by customer/ field verified	
	6564 & 1479	questioned by customer/ field verified	
	33 Total Meters		
	2009	5049 & 5491	questioned by customer/ field verified
8602 & 3859		questioned by customer/ field verified	
4734		questioned by customer/ field verified	
5100		questioned by customer/ field verified	
5052 & 5055		questioned by customer/ field verified	
4856 & 4058		questioned by customer/ field verified	
5053 & 5054		questioned by customer/ field verified	
6902 & 6904		questioned by customer/ field verified	
7086 & 9191		questioned by customer/ field verified	
7518 & 0077		questioned by customer/ field verified	
0357 & 6102		questioned by customer/ field verified	
5102 & 8433		questioned by customer/ field verified	
6132 & 8748		questioned by customer/ field verified	
24 Total Meters			
2010	3125 & 3536	questioned by customer/ field verified	
	6762	questioned by customer/ field verified	
	0229	questioned by customer/ field verified	
	2399	questioned by customer/ field verified	
5 Total Meters			
2006 - 2010	92 Total Switched Meters		

Meter Multiplier Issues for SD - means of discovery

	Premise Number (last 4 digits)	Means of Discovery
2008	3504	Multiplier error was discovered at time of tenant change.
	7339	Meter was installed with the wrong multiplier. The error was discovered 11 days later

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff Data Request No. 3-3

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Other meter errors: ARSD 20:10:17:09

(3-3) What was the total monetary value of each error and the corresponding length of time the meter reading was in error?

Response:

Once there has been verification of a switched meter by Xcel Energy field personnel, the financial adjustments are completed for the meters/premises affected. Between 2006 and 2010, the financial impact of the switched meters was a credit of \$13,341.99 and a debit of \$10,951.04 to the 92 impacted meters/premises.

The financial impact of the two meters with multiplier errors was \$2,792.59. A financial adjustment was only needed for one of the meters as the error was discovered at the time of a tenant change on the other meter.

Exhibits 3-3a and 3-3b depicts the value of each error and the length of time the meter was in error.

Preparer: Wayne Stifter

Title: Manager, Billing Operations

Department: Billing

Telephone: 651-639-4506

Date: June 30, 2010

Switched Meters Deployed in South Dakota - length of time and monetary value

	Premise Number (last 4 digits)	Date Field Verification Received	Date Billing Adjustment Issued	TOTAL CREDITS	Total DEBIT \$
2006	2929 & 0899	1/11/06	1/11/06	\$ 242.02	\$ 160.74
	4508 & 3643	5/4/06	5/5/06	\$ 27.83	\$ 59.68
	9055 & 0064	7/28/06	8/4/06	\$ 25.25	\$ 22.55
	0615 & 9395	9/8/06	9/8/06	\$ 713.74	\$ 711.26
	7324 & 3217	9/12/06	9/13/06	\$ 125.83	
	0847 & 4443	10/23/06	10/26/06	\$ 222.34	\$ 311.72
	1646 & 0946	11/20/06	11/21/06	\$ 365.90	\$ 359.75
14 Total Meters				\$ 1,722.91	\$ 1,625.70
2007	8818 & 8817	8/13/07	8/22/07	\$428.06	\$428.06
	2463	9/10/07	9/12/07	\$17.54	\$530.79
	2481	9/10/07	9/12/07	\$203.39	\$ 229.90
	2464	9/10/07	9/12/07	\$8.12	\$ 63.72
	2483	9/10/07	9/12/07	\$ 318.03	
	2484	9/10/07	9/12/07	\$ 124.51	\$5.23
	2485	9/10/07	9/12/07	\$ 77.07	\$ 142.23
	2465	9/10/07	9/12/07	\$ 391.19	
	2486	9/10/07	9/12/07		\$ 227.31
	8993 & 6859	9/2/07	10/2/07	\$ 240.44	\$ 181.92
	0660 & 3138	9/28/07	10/15/07	\$ 395.33	\$ 395.34
	0009 & 8730	9/10/07	10/25/07	\$ 756.85	\$ 782.11
16 Total Meters				\$2,960.53	\$2,986.61
2008	1620 & 3421	12/17/2007	2/7/08	\$ 145.57	\$ 145.57
	9833 & 9834	4/7/2008	4/22/08	\$ 15.29	\$ 11.92
	9835 & 9832	4/7/2008	4/23/08	\$ 94.24	\$ 94.24
	9036 & 9063	4/21/2008	5/9/08	\$ 29.61	\$ 283.92
	6684 & 5171	3/14/2008	5/19/08	\$ 217.14	\$ 217.14
	1167 & 1170	7/18/2008	7/25/08	\$ 23.07	\$ 25.52
	1171 & 1166	7/18/2008	8/7/08	\$ 39.51	\$ 67.29
	9169 & 5639	5/29/2008	8/13/08	\$ 408.52	\$ 454.65
	1168 & 1169	6/21/2008	8/20/08	\$ 26.22	\$ 12.16
	1164 & 1173	8/8/2008	8/20/08	\$ 77.64	\$ 56.81
	1165	8/8/2008	8/20/08	\$ 11.53	
	1175	7/21/2008	8/21/08		\$ 57.14
	1162 & 1174	7/21/2008	8/21/08	\$ 173.86	
	0818 & 6077	9/9/2008	10/8/08	\$ 214.54	\$ 214.12
	7425 & 1520	11/16/07 & 9/8/08	10/20/08	\$ 767.78	\$ 586.01
	7921 & 8616 & 7355	10/28/2008	12/16/08	\$ 400.37	\$ 400.37
	6564 & 1479	12/9/2008	12/22/08	\$ 284.11	\$ 244.37
33 Total Meters				\$ 2,929.00	\$ 2,871.23
2009	5049 & 5491	12/30/2008	1/28/09	\$ 1,089.32	\$ 1,630.33
	8602 & 3859	11/10/2008	1/29/09	\$ 20.59	\$ 23.37
	4734	2/18/2009	2/26/09	\$ 253.21	
	5100	2/18/2009	2/26/09		\$ 253.21
	5052 & 5055	2/4/2009	4/20/09	\$ 231.86	\$ 198.01
	4856 & 4058	5/1/090	5/18/09	\$ 23.09	\$ 23.09
	5053 & 5054	2/14/2009	5/19/09	\$ 476.58	\$ 495.27
	6902 & 6904	5/5/2009	7/2/09	\$ 72.79	\$ 860.57
	7086 & 9191	3/27/2009	7/8/09	\$268.96	
	7518 & 0077	9/10/2009	10/9/09	\$ 430.15	\$ 430.15
	0357 & 6102	10/22/2009	10/22/09	\$ 56.81	\$ 321.73
	5102 & 8433	9/22/2009	11/17/09	\$ 121.65	\$ 121.65
	6132 & 8748	11/6/2009	11/24/09	\$ 490.84	\$ 490.84
24 Total Meters				\$ 2,172.73	\$ 2,941.31
2010	3125 & 3536	2/5/2010	2/9/10	\$ 3,395.12	\$ 358.28
	6762 & 0229 & 2399	2/23/2010	2/23/10	\$ 161.70	\$ 167.91
5 Total Meters				\$ 3,556.82	\$ 526.19
2006 - 2010	93 Total Switched Meters			\$13,341.99	\$ 10,951.04

Meter Multiplier Issues for SD - number of days and resolution

Premise Number (last 4 digits)	Date Logged/ Rebill Issued	Financial Impact	Time Error Existed (Number of Days)	Resolution
3504	11/19/2008	\$0.00	zero days	Zero \$ impact since the multiplier was discovered and changed at time of tenant change.
7339	8/18/2008	\$2,792.59	11 days (7/26/08 - 8/6/08)	Meter was installed with the wrong multiplier. The error was discovered 11 days later, billing corrected and rebilled.

2008

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 3-4

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Other meter errors: ARSD 20:10:17:09

(3-4) Please detail how the error was resolved.

Response:

Upon verification of the switched meter, Xcel Energy Billing corrects the meter assigned to the premise and makes the necessary account adjustments. Adjustments are made up to 1 year from date of verification for those accounts being debited and up to 3 years from the date of verification for those accounts receiving a credit.

In the case of a meter multiplier error, once the error has been identified and verified, the instrument transformer ratio is corrected. Any necessary account adjustments are then made.

Exhibits 3-3a and 3-3b describe how each error was resolved.

Preparer: Wayne Stifter

Title: Manager, Billing Operations

Department: Billing

Telephone: 651-639-4506

Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff Data Request No. 3-5

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Other meter errors: ARSD 20:10:17:09

(3-5) Do you believe SDCL 15-2-13 limits the time you may back-bill if a meter error cause is discovered with “reasonable certainty”?

Response:

SDCL § 15-2-13 provides a six-year statute of limitations for an action upon a contract unless a different limitation is prescribed by statute. South Dakota Admin. R. 20:10:17:09 provides that the time period to recover an undercharge may extend to the time the date of the error may be fixed with reasonable certainty. However, the statutes implemented by the rules do not address the timing issue. The Company believes that the six-year period prescribed by SDCL 15-2-13 is an adequate limitation on the time period to recover an undercharge.

Preparer: Jim Wilcox

Title: Manager of Government and Regulatory Affairs

Department: Xcel Energy South Dakota

Telephone: 339-8350

Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff Data Request No. 3-6

Requestor: Kara Semmler

Date Received: May 5, 2010

Question:

Other meter errors: ARSD 20:10:17:09

(3-6) Do you believe SDCL 15-2-13 limits a customer refund if a meter error were made such that the consumer were over-billed?

Response:

SDCL § 15-2-13 provides a six-year statute of limitations for an action upon a contract unless a different limitation is prescribed by statute. South Dakota Admin. R. 20:10:17:09 provides that the refund period may extend to the time the date of the error may be fixed with reasonable certainty. However, the statutes implemented by the rules do not address the timing issue. The Company believes that the six-year period prescribed by SDCL 15-2-13 is an adequate limitation on the refund period.

Preparer: Jim Wilcox

Title: Manager of Government and Regulatory Affairs

Department: Xcel Energy South Dakota

Telephone: 339-8350

Date: June 30, 2010

- Non Public Document – Contains Trade Secret Data
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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff Data Request No. 4-1

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-1) Generally, does your tariff deviate from the administrative rules regarding these types of meter related issues?

Response:

Exhibit 4-1 following depicts Xcel Energy's tariff section No. 6 sheet No. 15 approved by the Commission in Docket EL09-009 in the recent rate case proceeding. Language in this tariff implements the Company's interpretation of SD Administrative rules in section 20:10:17.

We believe our tariff to be consistent with the administrative rules in effect at this time.

Preparer: Jim Wilcox

Title: Manager of Government & Regulatory Affairs

Department: South Dakota

Telephone: 339-8350

Date: June 30, 2010

Northern States Power Company, a Minnesota corporation
 Minneapolis, Minnesota 55401

SOUTH DAKOTA ELECTRIC RATE BOOK - SDPUC NO. 2

GENERAL RULES AND REGULATIONS (Continued)

Section No. 6
 1st Revised Sheet No. 15
 Cancelling Original Sheet No. 15

3.6 BILL DATE DUE

Bills are due and payable upon presentation. For purposes of applying the late payment charge, the date due shown on the customer's bill shall be:

<u>Class</u>	<u>Date Due</u>
Large commercial and industrial Customers All Other Customers	The date no less than 20 days after the billing transmittal date by which a bill should be paid and the date before which no disconnection notice may be sent.

N
N
N
N
N

Residential and Small General Service customers have the option of selecting a modified due date for paying their bill. The due date can be extended up to a maximum of 14 calendar days from the normal due date. Customers selecting a modified due data will remain on that due date for a period not less than 12 months or may change back to the normal due date anytime.

N
N

3.7 ESTIMATED BILLS

An estimated bill will be rendered if impractical for the Company to read the meter or customer fails to supply a meter reading form in time for the billing operation or in cases of emergency. An adjustment, if any, will be made in the bill based on the next meter reading.

3.8 BILLING ADJUSTMENTS

In General:

In the event of a meter or billing error resulting from:

- (1) an inaccurate meter;
- (2) an incorrect reading of the meter;
- (3) incorrect application of a rate schedule;
- (4) incorrect connection of the meter;
- (5) application of an incorrect multiplier or constant;
- (6) bill delay;
- (7) or other similar errors affecting billing as defined by the Public Utilities Commission's rule, the Company shall recalculate the customer's bill consistent with the Public Utilities Commission's rules and tariffs.

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(Continued on Sheet No. 6-15.1)

Date Filed: 06-30-09	By: Judy M. Pofert President and CEO of Northern States Power Company, a Minnesota corporation	Effective Date: 01-18-10
Docket No. EL09-009		Order Date: 01-12-10

Northern States Power Company, a Minnesota corporation
Minneapolis, Minnesota 55401

SOUTH DAKOTA ELECTRIC RATE BOOK - SDPUC NO. 2

GENERAL RULES AND REGULATIONS (Continued)

Section No. 6
Original Sheet No. 15.1

3.8 BILLING ADJUSTMENTS (Continued)

Underbilled

In the event the customer was underbilled, the Company, except as provided below for billing errors resulting from Meter Errors, may recalculate the bills for service during the period of the error, up to a maximum of six years from the date of payment.

Overbilled

In the event the customer was overbilled, the Company, except as provided below for billing errors resulting from Meter Errors, shall recalculate bills for errors resulting in overcharges up to a maximum of six years from the date of payment.

Meter Error

In the event the Company meter was found to be defective upon testing, the Company shall calculate the adjustment amount on the basis the metering equipment should be 100% accurate, in accordance with the rules prescribed by the Public Utilities Commission. The Company shall refund the customer any excess charges for incorrectly metered electric service for a period equal to one-half the time elapsed since the last previous meter test, but not to exceed six months unless it can be established that the error was due to some cause, the date of which can be fixed with reasonable certainty, in which case the refund or charge will be computed from that date. The Company may charge the customer for any deficiency in billing for incorrect metered electric service for a period equal to one-half the time elapsed since the last previous meter test, but not to exceed six months unless it can be established that the error was due to some cause, the date of which can be fixed with reasonable certainty, in which case the refund or charge will be computed from that date. Adjustments shall be based on actual monthly consumptions.

Meter Error due to Meter Registration Creep

In the event the Company meter was found to be defective upon testing, the Company shall calculate the rate of creeping for one-half the time elapsed since the last previous meter test, but not to exceed six months unless it can be established that the error was due to some cause, the date of which can be fixed with reasonable certainty, in which case the refund or charge will be computed from that date.

Meter Error Due to Partial or Complete Meter Failure

In the event the average meter error cannot be determined by a test because the Company meter failed either partially or completely, the Company shall use the check metering registration, if any, to estimate the quantity of energy used, or estimate the quantity of energy used on all available data. The Company shall advise the customer of the metering equipment failure and the basis for the estimated bill. Any adjustment shall be made from the discovery date of metering equipment failure, or if not known, for a period equal to one-half the time elapsed since the last previous meter test, but not to exceed six months unless it can be established that the error was due to some cause, the date of which can be fixed with reasonable certainty, in which case the refund or charge will be computed from that date.

(Continued on Sheet No. 6-16)

Date Filed:	06-30-09	By: Judy M. Pofert	Effective Date:	01-18-10
		President and CEO of Northern States Power Company, a Minnesota corporation		
Docket No.	EL09-009		Order Date:	01-12-10

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 4-2

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-2) Please provide an example of the letter or other information you send a customer in a meter error occurs.

Response:

Please see exhibit 4-2 following.

Preparer: Wayne Stifter

Title: Manager, Billing Operations

Department: Billing

Telephone: 651-639-4506

Date: June 30, 2010

Example letter

6/30/2010

#REF!
#REF!
#REF!

Dear Customer:

A testing of your electric meter revealed that it had been functioning fast, resulting in inaccurate recording of your kWh usage. The following is a recap of your recalculation:

Customer Number:	#REF!	
Premise Number:	#REF!	
Service Address:	#REF!	
	#REF!	
Type of Service	Electric	
Percentage Meter Fast	#REF!	
Start Date of Re-Calc	#REF!	
End Date of Re-Calc	#REF!	
Re-calculated Credit Amt		#REF!
	#REF!	#REF!
Total Credit Refund		#REF!

The above refund amount will be credited to your account number: #REF! .
If you have any questions regarding this refund, please call us at 1-800/895-4999.

Sincerely,

Billing Services
Xcel Energy

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 4-3

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-3) Please detail any internal mechanism whether in your billing system or otherwise, that warns of abnormal usage (either high or low)

Response:

Each customer's consumption is passed through both high and low system validation prior to invoicing. Exceptions reported as a result of the high/low validations are stopped for manual review. Accounts reported as an exception will not invoice without the performance of a manual review.

Secondarily, we have another system validation which occurs after the customer has been invoiced. This validation measures the customer's invoice total against an average invoice total for their customer class, (i.e. Residential, Commercial, etc.). Exceptions to this process, both credits and debits, are not released to the customer until a manual review is performed.

Preparer: Steve Moschkau

Title: Solutions Consultant

Department: Business Systems

Telephone: 715-737-4279

Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 4-4

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-4) Do you ever analyze like situated commercial consumers regarding usage? For example: does your system have a mechanism to compare like situated businesses such that a red flag is raised if one is consuming half the gas or electric of another?

Response:

No, we do not compare like customers through the billing system today.

Preparer: Wayne Stifter

Title: Manager, Billing Operations

Department: Billing

Telephone: 651-639-4506

Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff Data Request No. 4-5

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-5) List by year, for the past 5 years, the number of meter checks performed on your system in South Dakota due to customer requests.

Response:

During late 2009, the work order issuance and tracking systems within NSPM were modified to allow capturing and reporting on the notification source from which meter check orders resulted. Prior to 2009, the source of the request for a meter check was not tracked nor reported on. The analysis of the data since the system upgrade to current resulted in the following number of customer-requested meter checks being tracked:

2009 11 customer-requested meter checks

2010 13 customer-requested meter checks

Prior to 2009, when a meter check was requested, an order was sent to field personnel to complete, as it is today, however the system of record did not delineate customer request orders as it does today.

Preparer: Linda L. Zeits

Title: Manager, Planning and Performance – Metering

Department: Metering

Telephone: 651-265-7122

Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 4-6

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-6) Please explain your position regarding whether over-billing and under-billing should be handled different.

Response:

The Company does not advocate any changes at this time.

Preparer: Wayne Stifter

Title: Manager, Billing Operations

Department: Billing

Telephone: 651-639-4506

Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff Data Request No. 4-7

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-7) Please provide the annual number of errant billings for each of the last 5 years where the date of the cause of the error can be fixed with reasonable certainty. Please provide the dollar amount of the refund or collection for each of the errant billings above separately identifying the base rate and FAC or PGA amount.

Response:

In South Dakota in the last 5 years there have been 38 meters where the date of the cause of the error can be determined with reasonable certainty. The cause of the error was a meter failing to register.

The financial impact of the error for each of those meters is depicted on exhibit 4-7 following. For each meter, the exhibit separates the base rate amount from the Fuel Adjustment Clause amount.

Preparer: Linda L. Zeits

Title: Manager, Planning and Performance – Metering

Department: Metering

Telephone: 651-265-7122

Date: June 30, 2010

**Identified Errors Remedied Through a Field Investigation
 Analysis of Rebill Broken out by Base Rate and Fuel Adjustment Clause**

Year	Premise Number (last 4 digits)	Start Date of Meter Error	Meter Exchange Date	Length of reading error Days	Date Rebill Issued	Total Monetary Value of Error	FCA	Base Rate
2006	6937	8/8/2006	11/9/2006	93	11/13/2006	\$ 357.15	\$ 74.29	\$ 282.86
	1 Total					\$ 357.15	\$ 74.29	\$ 282.86
2007	2237	05/01/07	07/02/07	62	07/05/07	\$ 165.77	\$ 32.11	\$ 133.66
	0026	12/25/06	08/31/07	249	09/24/07	\$ 25,667.31	\$ 5,623.04	\$ 20,044.27
	6263	09/06/07	11/08/07	63	11/16/07	\$ 126.23	\$ 24.76	\$ 101.47
	4495	12/5/2006	2/24/2007	81	2/28/2007	\$ 146.95	\$ 19.97	\$ 126.98
	0115	4/20/2006	2/8/2007	294	3/21/2007	\$ 710.51	\$ 90.47	\$ 620.04
	2947	10/16/2006	3/6/2007	141	3/7/2007	\$ 348.68	\$ 47.84	\$ 300.84
	6376	2/5/2007	4/20/2007	74	4/27/2007	\$ 125.24	\$ 23.02	\$ 102.22
	5285	2/15/2007	3/28/2007	41	3/29/2007	\$ 86.59	\$ 15.73	\$ 70.86
	9622	5/10/2006	9/24/2007	502	10/15/2007	\$ 784.97	\$ 110.34	\$ 674.63
	9 Total					\$ 28,162.25	\$ 5,987.28	\$ 22,174.97
2008	2065	10/23/2007	3/25/2008	154	03/31/08	\$ 2,706.14	\$ 399.29	\$ 2,306.85
	7030	1/4/2008	4/18/2008	105	04/21/08	\$ 64.96	\$ 5.25	\$ 59.71
	7310	5/24/2008	7/25/2008	62	08/08/08	\$ 42.28	\$ 8.40	\$ 33.88
	9634	1/28/2008	7/10/2008	164	8/4/2008	\$ 420.50	\$ 72.00	\$ 348.50
	4008	6/24/2008	9/4/2008	72	10/27/2008	\$ 175.95	\$ 29.61	\$ 146.34
	5 Total					\$ 3,409.83	\$ 514.55	\$ 2,895.28
2009	6138	9/15/2009	11/17/2009	63	12/11/09	\$ 153.00	\$ 28.43	\$ 124.57
	6869	7/2/2008	2/25/2009	238	3/2/2009	\$ 728.53	\$ 153.40	\$ 575.13
	7492	5/7/2008	3/5/2009	302	5/27/2009	\$ 724.14	\$ 145.35	\$ 578.79
	0955	3/11/2009	4/17/2009	37	5/5/2009	\$ 25.87	\$ 3.15	\$ 22.72
	3176	6/3/2008	3/18/2009	288	4/7/2009	\$ 936.84	\$ 180.23	\$ 756.61
	6846	8/3/2008	3/12/2009	221	4/1/2009	\$ 1,140.18	\$ 225.51	\$ 914.67
	7829	7/2/2008	2/25/2009	238	3/5/2009	\$ 966.64	\$ 192.63	\$ 774.01
	6598	2/4/2009	4/15/2009	70	4/27/2009	\$ 123.78	\$ 20.58	\$ 103.20
	4268	6/9/2008	3/12/2009	276	3/26/2009	\$ 483.28	\$ 83.53	\$ 399.75
	1998	8/5/2009	12/11/2009	128	1/12/2010	\$ 516.25	\$ 89.80	\$ 426.45
	0612	9/24/2009	11/25/2009	62	11/30/2009	\$ 220.78	\$ 38.14	\$ 182.64
	1480	9/9/2009	12/29/2009	111	1/8/2010	\$ 416.41	\$ 70.02	\$ 346.39
	8762	4/1/2008	3/16/2009	349	4/2/2009	\$ 3,447.07		\$ 3,447.07
	13 Total					\$ 9,882.77	\$ 1,230.77	\$ 8,652.00
2010	1998	8/5/2009	12/11/2009	128	01/12/10	\$ 455.39	\$ 89.80	\$ 365.59
	7941	11/10/2009	1/18/2010	69	01/21/10	\$ 106.16	\$ 21.14	\$ 85.02
	7053	1/18/2010	3/24/2010	65	05/12/10	\$ 121.54	\$ 79.10	\$ 42.44
	9284	1/18/2010	3/24/2010	65	05/12/10	\$ 67.57	\$ 20.83	\$ 46.74
	2001	1/17/2010	3/24/2010	66	05/12/10	\$ 79.54	\$ 49.24	\$ 30.30
	6699	1/19/2010	4/19/2010	90	05/21/10	\$ 63.28	\$ 11.47	\$ 51.81
	0413	1/18/2010	3/24/2010	65	5/14/2010	\$ 131.20	\$ 33.87	\$ 97.33
	9571	1/18/2010	3/24/2010	65	5/12/2010	\$ 111.52	\$ 28.09	\$ 83.43
	1245	1/18/2010	3/24/2010	65	5/12/2010	\$ 163.14	\$ 42.86	\$ 120.28
	1311	8/5/2009	5/4/2010	272	5/11/2010	\$ 952.67	\$ 193.16	\$ 759.51
	10 Total					\$ 2,252.01	\$ 569.56	\$ 1,682.45
2006- 2010 Total	38 Meters					\$ 44,064.01	\$ 8,376.45	\$ 35,687.56

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 4-8

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-8) Please provide Company policy regarding the length of time allowed a customer to pay a collection for an errant billing where the date of the cause of the error can be fixed with reasonable certainty. How do you communicate this to the customer?

Response:

Customer's are allowed to establish payment plans on a rebill. The length of time normally provided to a customer to pay in a rebilling situation is generally equal to the time associated with the rebill (i.e. for a 3 month rebill the customer is allowed to spread the amount over the next 3 months). The information is communicated with the customer upon contacting the utility once they have received the letter an associated rebill.

Preparer: Wayne Stifter

Title: Manager, Billing Operations

Department: Billing

Telephone: 651-265-4506

Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff Data Request No. 4-9

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-9) In the computation of the over billing or under billing caused by meter error, explain how the fuel clause amount or PGA amount of the revised billing is calculated, ie. Are historic FACs or PGAs used to determine the amount owed or refunded?

Response:

Over and under billing corrections performed within our billing system are completed using standard cancel/rebill system logic. Our system rebill logic utilizes the fuel clause rates that were effective during the time of the rebill period.

Preparer: Steve Moschkau

Title: Solutions Consultant

Department: Business Systems

Telephone: 715-737-4279

Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff Data Request No. 4-10

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-10) Please explain whether and how FAC or PGA amounts over or under collected due to meter error, and subsequently recovered from, or refunded to all customers through the FAC or PGA or for natural gas service, through the lost and unaccounted for gas factor.

Response:

Consistent with the correction of other billing determinants, billed FAC amounts resulting from meter error (primarily kWh use) are corrected through the Company's "cancel re-bill" process. For example, if a customer was billed for 100 kWh usage in April and during the following month it was verified that this customer should have been charged for 200 kWh instead, the 100 kWh April bill would then be canceled and the customer would be re-billed for the 200 kWh use. Error corrections resulting from the "cancel re-bill" process can and do go in both directions and tend to off-set each other.

While a true-up is made to correct the customer's bill including a true-up to their fuel clause adjustment charge, these corrections that are made to customer billings are not accounted for in the Company's fuel clause adjustment process. We believe that this would introduce a level of complexity into the monthly fuel clause accounting that is not warranted given the small level of the net the magnitude of the billing errors encountered.

Preparer: John Chow

Title: Pricing Consultant

Department: Regulatory Administration

Telephone: 612-330-7588

Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff Data Request No. 4-11

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-11) If it is assumed each rate case test year includes some level of errant billings due to errant metering, explain why it is appropriate to subsequently go back and refund or rebill customers when meter errors are found if there has been an intervening rate case.

Response:

The magnitude of prospective meter errors and their corresponding billing effect is very small relative to the total revenue requirement represented in a rate case. It is also important and we think fair to customers, to refund or rebill customers when metering or billing errors occur, especially when the correction is in the customers favor.

In other words, determining the appropriate billing and correcting for billing and metering errors is just a part of good business practice regardless of whether the magnitude is material for a test year rate case. Therefore, the Company would apply the proper billing rates to each historical month's correction regardless of the date of the last rate case.

Preparer: Jim Wilcox

Title: Manager of Government & Regulatory Affairs

Department: South Dakota

Telephone: 339-8350

Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 4-12

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-12) Please describe the Companies meter testing program including the timeframe of testing the entire population of the company's meters and whether certain meters are tested more often than others. Provide the average annual cost of meter testing and the number and types of meters tested. If testing costs differ between specific types or sizes of meters. Provide the average cost of testing a meter of each type or size.

Response:

The NSPM meter testing program consists of two types of testing protocols:

1) New meter testing: All new electrical meters arriving from the manufacturer are sample tested according to ANSI Z1.9 before any meters of the arriving group are accepted and subsequently installed. The actual number of meters tested when a shipment arrives at the Electric Meter lab is determined by statistical sample calculation based on the shipment size.

2) In-Service Meter testing: In-service meters are tested under a *random* sample or *periodic* test program.

a. All self-contained non-demand electro-mechanical meters are tested under the *random* sample test program. These meters are tested and analyzed according to ANSI Z1.9 specifications. All meters are included in the population annually when the statistical sampling is completed.

b. All electronic and demand meters are tested under the *periodic* test program. All meters in the periodic test program are tested on a 16-year rotation with the exception of large commercial and industrial interval data meters which are tested on an 8-year rotation.

New Meter Testing

The new meter sample test program tested 28,599 meters in 2007 through 2009. In 2010, the meter lab labor cost associated with testing a new single phase meter with automated meter reading (AMR) capabilities is approximately \$11.30.

In-Service Meter Testing

In 2009, the *random* sample test program tested approximately 130 self-contained non-demand meters that had been deployed in South Dakota. Also that year, the *periodic* sample test program tested 91 demand meters that had been deployed in South Dakota. These test levels are indicative of the annual sample that is routinely pulled for South Dakota.

The lab labor costs for testing of in-service meters is:

Meter Type	2009 per meter	2010 per meter*
Re-serviced 1 phase with AMR	\$10.37	\$10.81
Re-serviced 3 phase with AMR	\$17.30	\$18.01
Re-serviced 3 phase without AMR	\$8.03	\$8.36

*The 2010 costs reflect the increased hourly wage of the lab technicians over 2009 rates.

Preparer: Linda L. Zeits
Title: Manager, Planning and Performance - Metering
Department: Metering
Telephone: 651-265-7122
Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff Data Request No. 4-13

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-13) Are large usage customer's meters checked more often, thus limiting the amount of time which correction may need to be made, and also limiting the amount of potential over and under billings?

Response:

Yes, the meters installed on NSPM's large commercial and industrial customers are checked under the *periodic* test program more frequently than other customers on the *periodic* test program. This increased frequency limits the amount of time for which corrections need to be made and the financial impacts should rebilling be necessary.

In addition to the *periodic* test program, when a new meter is set on a large user NSPM protocol calls for an installation inspection test be completed 60-days after install. The test is to ensure that the meter is installed correctly, programmed properly, and recording usage accurately.

Preparer: Linda L. Zeits

Title: Manager, Planning and performance – Metering

Department: Billing

Telephone: 651-265-7122

Date: June 30, 2010

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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 4-14

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-14) If the answer to (13) is yes, what is your policy for checking those meters? If the answer is no, explain why that risk is not being mitigated by more frequent testing of large user meter , and also state whether you would suggest a separate refunding or rebilling policy for small v. large usage customers?

Response:

The NSPM *periodic* test program protocol dictates that the interval meters installed on large commercial and industrial customers be tested on an 8-year cycle compared to other customers on the *periodic* test program which are tested on a 16-year cycle.

Preparer: Linda L. Zeits

Title: Manager, Planning and Performance - Metering

Department: Metering

Telephone: 651-265-7122

Date: June 30, 2010

- Non Public Document – Contains Trade Secret Data**
 Public Document – Trade Secret Data Excised
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Xcel Energy

Docket No.: RM10-001

Response To: SDPUC Staff

Data Request No. 4-15

Requestor: Kara Semmler

Date Received: May 5, 2010

Question: (4-15) If it is decided to limit the time period to calculate customer rebilling for error correction, how would you propose to “make up” for forgone net revenue?

Response:

The Company does not believe that the magnitude of the net effect of rebilling for meter errors is significant enough to warrant the need for a “make up” process.

Preparer: Jim Wilcox

Title: Manager of Government & Regulatory Affairs

Department: South Dakota

Telephone: 339-8350

Date: June 30, 2010