



500 West Russell Street  
Sioux Falls, South Dakota 57101-0988

June 19, 2018

—VIA ELECTRONIC FILING—

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

RE: PETITION FOR EXTENSION OF FILING DEADLINE FOLLOWING TEST PERIOD  
DOCKET NO. EL18-\_\_

Dear Ms. Van Gerpen:

Northern States Power Company, doing business as Xcel Energy (“NSP” or the “Company”), submits the attached petition for an extension of filing deadline following test period pursuant to SDCL Chapter 49-34A and ARSD § 20:10:13:44 to permit the Company to use a 2017 calendar year test period in its forthcoming 2018 electric general rate case. NSP proposes to file its general rate case on or before September 1, 2018.

If you have any questions regarding this filing, please contact Steve Kolbeck at [steven.t.kolbeck@xcelenergy.com](mailto:steven.t.kolbeck@xcelenergy.com) or 605-339-8350.

Sincerely,

/s/

STEVEN T. KOLBECK  
PRINCIPAL MANAGER – SOUTH DAKOTA

Enclosures

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

IN THE MATTER OF THE PETITION OF NORTHERN  
STATES POWER COMPANY D/B/A XCEL ENERGY  
FOR EXTENSION OF TEST PERIOD

DOCKET NO. EL18-\_\_\_\_

**PETITION**

**PETITION FOR EXTENSION OF FILING  
DEADLINE FOLLOWING TEST PERIOD**

Northern States Power Company, doing business as Xcel Energy (“NSP,” or the “Company”) submits to the South Dakota Public Utilities Commission (“Commission”) this Petition for an extension of filing deadline following test period, pursuant to SDCL Chapter 49-34A and ARSD § 20:10:13:44.

**I. GENERAL FILING INFORMATION**

**1. Name, Address, and Telephone Number of the Utility**

Northern States Power Company  
500 West Russell Street  
Sioux Falls, SD 57104  
(605) 339-8303

**2. Name, Address, and Telephone Number of Utility Attorney**

Ryan Long  
Principal Attorney  
414 Nicollet Mall, 401 – 8th Floor  
Minneapolis, MN 55401

**3. Service List Request**

The Company requests that the following persons be placed on the Commission’s official service list for this proceeding:

Ryan Long  
Principal Attorney  
Xcel Energy  
401 Nicollet Mall, 8th floor  
Minneapolis, MN 55401  
[ryan.j.long@xcelenergy.com](mailto:ryan.j.long@xcelenergy.com)

Carl Cronin  
Regulatory Administrator  
Xcel Energy  
401 Nicollet Mall, 7th Floor  
Minneapolis, MN 55401  
[regulatory.records@xcelenergy.com](mailto:regulatory.records@xcelenergy.com)

Any information requests in this proceeding should be submitted to Mr. Cronin at the Regulatory Records e-mail address indicated above.

## **II. PETITION FOR EXTENSION OF FILING DEADLINE FOLLOWING TEST PERIOD**

4. The Company proposes to file an electric general rate case on or before September 1, 2018. The Company's electric rates currently in effect were determined by order of the Commission issued June 16, 2015.<sup>1</sup> The Company proposes to base its forthcoming request on a 2017 calendar year test period.

5. Commission regulation ARSD § 20:10:13:44 requires the use of a test period consisting of 12 months of actual experience ending no earlier than 6 months before the date of filing unless good cause for extension is shown.

6. The Company requests authorization to use a 2017 calendar year test period as the basis for its proposed rates. At the time the filings are made in September, approximately eight months will have transpired since the close of the test period. The Company believes the 2017 calendar year test period, with appropriate pro forma adjustments, will reflect its cost of service and provide an accurate view of its financial results.

7. The following reasons for using a 2017 calendar year test period constitute good cause supporting its use:

(a) A September 1, 2018 filing date is approximately 2 months beyond June 30, 2018. The short difference in time ensures that costs, revenues, and expenses will not have substantially changed so as to make the 2017 calendar year test period unrepresentative;

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<sup>1</sup> *In the Matter of the Application of Northern States Power Co. d/b/a Xcel Energy for Auth. to Increase Its Elec. Rates*, Docket No. EL14-058, ORDER GRANTING JOINT MOTION FOR APPROVAL OF SETTLEMENT STIPULATION; ORDER APPROVING REFUND PLAN (June 16, 2015).

(b) The 2017 calendar year test period consisting of 12 months actual experience and adjusted for known and measurable changes will accurately reflect NSP's rate base and cost of service;

(c) The Company maintains its books and records on a calendar-year basis;

(d) Verification of the company's financial data will be more accurate and less time-consuming if calendar year data is used because publicly-filed annual reports reflect calendar year results. Data provided in annual reports to the United States Securities and Exchange Commission ("SEC"), Federal Energy Regulatory Commission ("FERC"), and state regulatory authorities are provided on this basis. Commission Staff and other possible parties to the forthcoming rate proceeding would more easily be able to audit and verify NSP's book results by analyzing these publicly-filed reports. Also, the calendar year basis should make verification of pro forma adjustments easier;

(e) Pro forma adjustments will not be affected by use of a calendar year test period because of nominal inflation;

(f) The cost of providing electric service has not changed materially during calendar year 2018 to date; and

(g) Use of a non-calendar test period could otherwise increase rate case costs if additional non-standard documents must be prepared.

8. Lastly, the Commission has previously granted such requests, finding good cause to grant extensions of the filing deadline following the test period, thus enabling electric and natural gas utilities to utilize a calendar year test period for their respective rate cases.<sup>2</sup>

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<sup>2</sup> See e.g., *In the Matter of the Petition of MidAmerican Energy Co. for Extension of Test Period*, Docket Nos. EL14-030, ORDER APPROVING EXTENSION OF FILING DEADLINE FOLLOWING TEST PERIOD (May 1, 2014) (electric); *In the Matter of the Petition of MidAmerican Energy Co. for Extension of Test Period*, Docket Nos. NG14-002, ORDER APPROVING EXTENSION OF FILING DEADLINE FOLLOWING TEST PERIOD (May 1, 2014) (gas); *In the Matter of the Petition of Otter Tail Power Co. for Approval of an Extension of Test Period*, Docket No. EL10-005, ORDER APPROVING EXTENSION OF TEST PERIOD (June 16, 2010); *In the Matter of the Petition of Otter Tail Power Corp. d/b/a Otter Tail Power Company for Approval of an Extension of Its Test Period*, Docket No. EL08-013, ORDER APPROVING EXTENSION OF TEST PERIOD (July 2, 2008); *In the Matter of the Filing of MidAmerican Energy Co. for Approval of Petition for Extension of Test Period*, Docket No. NG01-008, ORDER APPROVING EXTENSION OF TEST PERIOD (Aug. 21, 2001).

### III. CONCLUSION

NSP respectfully requests that the South Dakota Public Utilities Commission find good cause exists pursuant to ARSD § 20:10:13:44 to extend the filing deadline following the test period and to authorize the use of a 2017 calendar year test period, with appropriate adjustments, for the Company's 2018 general rate increase in electric rates, which NSP currently plans to file on or before September 1, 2018.

Dated: June 19, 2018

Respectfully submitted,

NORTHERN STATES POWER COMPANY  
D/B/A XCEL ENERGY

/s/

By: STEVE T. KOLBECK  
PRINCIPAL MANAGER – SOUTH  
DAKOTA