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Aug 31, 2011

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

Re: RM09-002 - In the Matter of the Adoption of Rules Regarding Renewable, Recycled and Conserved Energy and 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:

Xcel Energy respectfully submits these comments regarding the revised draft rules issued in the above dockets on August 4, 2011. We appreciate the opportunity to comment on the revised proposed draft rules.

Regarding Proposed Rule 20:10:17:09.1

This proposed rule would establish a time period for refund of an overcharge and set a customer repayment schedule for billing of an undercharge, both of which would be related to metering and billing errors. Xcel Energy accepts and can comply with the thirty day time requirement for issuing a refund associated with an overcharge and the calculation of the time period for customer repayment of an undercharge. We suggest that the present draft of the rule regarding the time period for customer repayment of an undercharge be expanded to permit a customer to choose a shorter repayment period. In cases where an undercharge has occurred, some customers may prefer to complete the repayment in a period less than two times the number of months in which the error occurred. Xcel Energy believes the customer should have an option to select a shorter repayment period if they so desire. Xcel Energy proposes the language for rule 20:10:17:09.1 be amended to allow the customer the option to repay an undercharged amount based on a repayment schedule less than two times the time period in which the

error occurred. We suggest that the following text be added to as a second paragraph to proposed rule 20:10:17:09.1.

The customer may select a repayment schedule with a duration less than or equal to two times the number of undercharged months.

Regarding Proposed Rules 20:10:38:01, :03, :06 and :07

It is Xcel Energy's understanding that South Dakota staff believes that these proposed draft rules and supporting definitions are intended to apply only in instances where the utility plans to use energy efficiency or demand response towards meeting the South Dakota Renewable, Recycled, and Conserved Energy Objective (RRCEO) of 10 percent by 2015. The Company supports this application of these rules, and requests that this scope of application be expressly stated in the rules and definitions. If the scope of the rules and definitions is expanded beyond the RRCEO to Xcel Energy's currently approved demand response portfolio or our proposed energy efficiency plan, the Company suggests that definitions similar to those offered in our December 17, 2010 reply to this matter be considered.

Regarding Proposed Rules 20:10:38:07 (1)

The Company believes there is a typo in this section. That the phrase "The amount of renewable energy credits that the provider retired," is repeated and is thus duplicated unnecessarily.

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

Sincerely,



Jim Wilcox