Minneapolis
City of Lakes

Office of the City Attorney

Susan L. Segal
City Attorney

350 South 5th Street - Room 210
Minneapolis, MN 55415

Office: 612 673-2010
Civil Division Fax: 612 673-3362
Criminal Division Fax: 612 673-2189
CPED Fax: 612 673-5112
TTY: 612 673-2157

January 11, 2016

The Honorable Jeffery Oxley
Administrative Law Judge
Office of Administrative Hearings
600 N. Robert Street
PO Box 64620
St. Paul, MN 55164-0620

VIA ELECTRONIC FILING

Re: *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*
MPUC Docket No. E-002/GR-15-826
OAH Docket No. 19-2500-33074
Our File No. PM 15-22805

Dear Judge Oxley:

On behalf of the City of Minneapolis, enclosed for filing regarding the above referenced matter, please find the a Petition to Intervene, Notice of Appearance and Certificate of Service.

By copy of this letter, all parties have been served with the same.

Sincerely,

Corey M. Conover

CORREY M. CONOVER
Assistant City Attorney
(612) 673-2182

CMC/asl
Enclosures

Call 311 Minneapolis
City Information and Services

www.minneapolismn.gov

Affirmative Action Employer

BEFORE THE MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS
600 N. Robert Street, St. Paul, Minnesota 55101

FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place E, Suite 350, St. Paul, Minnesota 5101-2147

In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota	OAH DOCKET NO. 19-2500-33074 MPUC DOCKET NO. E-002/GR-15-826 **CITY OF MINNEAPOLIS PETITION TO INTERVENE**

PETITION TO INTERVENE OF THE CITY OF MINNEAPOLIS

Pursuant to Minnesota Rules, the City of Minneapolis Petitions to intervene as a party in the above-referenced docket. The City states as follows:

1. The City of Minneapolis (hereinafter "City") is a Minnesota Home Rule Charter City pursuant to the laws and constitution of the State of Minnesota.

2. The City is the largest city in the State of Minnesota.

3. The City operates a comprehensive system of urban street lighting including street lights at intersections, at various mid-block points, and at other points throughout the City of Minneapolis. These street lights are provided electricity by Xcel Energy. The City estimates that it currently operates or contracts for the operation of approximately 43,000 street lights. The City operates an extensive and intensive urban road network which also includes approximately 800 electrically operated traffic signals,

electrically operated message signs, and other electrically operated equipment whose reliability and affordability is essential to operation in a complex, urban environment.

4. The City carries on various other municipal operations that consume electricity. A number of these operations are unique in Xcel's Minnesota service area because of the magnitude of their operation. The City operates this State's largest drinking water treatment plant and uses electricity for such operation. The costs for municipal drinking water and various other municipal utility services are passed through to customers through rates set by the City for operation of its various municipal utilities.

5. The City is located at the center of a large urban area. It has concerns unique to it as a city located in the center of a large urban area related to air pollution and responsibility for the environment in a densely populated urban area.

6. The inner urban location of the City of Minneapolis, the operation of a sophisticated and intensely used downtown, and the operation of large municipal utilities, makes the City of Minneapolis unique from other entities in Xcel's Minnesota service area.

7. The City represents interests which often cannot be adequately advanced by other entities. The City is an interested party to these proceedings in that it may be adversely bound and affected by the outcome regarding an interest peculiar to itself.

8. Please send notices, pleadings or filings in this proceeding to:

Corey M. Conover
Assistant Minneapolis City Attorney
350 S. Fifth Street
Rm. 210
Minneapolis, MN 55415
corey.conover@minneapolismn.gov

Based on the foregoing, the City respectfully seeks permission to receive full party status in this proceeding.

Respectfully submitted by,

CITY OF MINNEAPOLIS

Date: January 11, 2016

SUSAN L. SEGAL
City Attorney
By

/s/ Corey M. Conover
COREY M. CONOVER
Assistant City Attorney
Attorney Registration No. 0134247
Minneapolis City Attorney's Office
350 S. Fifth Street, Rm. 210
Minneapolis, MN 55402
(612) 673-2182

BEFORE THE MINNESOTA OFFICE OF ADMINISTRATIVE HEARINGS
600 N. Robert Street, St. Paul, Minnesota 55101

FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place E, Suite 350, St. Paul, Minnesota 5101-2147

In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota

OAH DOCKET NO. 19-2500-33074

MPUC DOCKET NO. E-002/GR-15-826

NOTICE OF APPEARANCE

Name, Address, and Telephone Number of Administrative Law Judge: Jeffery Oxley, Office of Administrative Hearings, 600 North Robert Street, St. Paul, Minnesota 55101 and (651) 361-7875. His mailing address is P.O. Box 64620, St. Paul, Minnesota 55164-0620.

TO THE ADMINISTRATIVE LAW JUDGE:

You are advised that the party named below will appear at the above hearing:

NAME OF PARTY:	City of Minneapolis, on its own behalf
ADDRESS:	350 S. Fifth Street Rm. 210 Minneapolis, MN 55415
PARTY'S ATTORNEY OR OTHER REPRESENTATIVE:	Corey M. Conover Assistant City Attorney
OFFICE ADDRESS:	City Attorney's Office 350 S. Fifth Street Rm. 210 Minneapolis, MN 55415
TELEPHONE NUMBER AND E-MAIL ADDRESS:	(612) 673.2182 corey.conover@minneapolismn.gov
SIGNATURE OF PARTY OR ATTORNEY:	*___/s/ Corey M. Conover___*
DATE:	January 11, 2016

CERTIFICATE OF SERVICE

In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota

OAH DOCKET NO. 19-2500-33074

MPUC DOCKET NO. E-002/GR-15-826

I, Angela Lund, of the City of Minneapolis, Minnesota, do hereby certify that I have on this date served copies of:

City of Minneapolis's Petition to Intervene; and
Notice of Appearance

via electronic filing e-service and/or facsimile upon the list of persons on the attached Service List.

DATE: January 11, 2016

Angela Lund
City of Minneapolis
City Attorney's Office
350 S. Fifth Street
Rm. 210
Minneapolis, MN 55415
(612) 673.2901
angela.lund@minneapolismn.gov

Service List Member Information

Electronic Service Member(s)

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Aafedt	David	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Electronic Service	No
Anderson	Christopher	canderson@allete.com	Minnesota Power	Electronic Service	No
Anderson	Julia	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	Yes
Archer	Alison C	alison.c.archer@xcelenergy.com	Xcel Energy	Electronic Service	Yes
Baranko	Gail	gail.baranko@xcelenergy.com	Xcel Energy	Electronic Service	No
Barlow	Ryan	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	Yes
Bertrand	James J.	james.bertrand@stinson.com	Stinson Leonard Street LLP	Electronic Service	No
Blazar	William A.	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Electronic Service	No
Canaday	James	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	Yes
Cochran	Jeanne	Jeanne.Cochran@state.mn.us	Office of Administrative Hearings	Electronic Service	Yes
Coffman	John	john@johncoffman.net	AARP	Electronic Service	No
Dammel	Joseph	joseph.dammel@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	No
Daugherty	Jeffrey A.	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	Electronic Service	No
Denniston	James	james.r.denniston@xcelenergy.com	Xcel Energy Services, Inc.	Electronic Service	Yes
Dobson	Ian	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	Yes
Eilers	Rebecca	rebecca.d.eilers@xcelenergy.com	Xcel Energy	Electronic Service	No
Fazio	Emma	emma.fazio@stoel.com	Stoel Rives LLP	Electronic Service	No
Ferguson	Sharon	sharon.ferguson@state.mn.us	Department of Commerce	Electronic Service	No
Fogel	Stephen	Stephen.E.Fogel@XcelEnergy.com	Xcel Energy Services, Inc.	Electronic Service	No
Garvey	Edward	garveyed@aol.com	Residence	Electronic Service	No
Gerber	Benjamin	bgerber@mnchamber.com	Minnesota Chamber of Commerce	Electronic Service	Yes
Gonzalez	Janet	Janet.gonzalez@state.mn.us	Public Utilities Commission	Electronic Service	Yes
Hoppe	Michael	il23@mtn.org	Local Union 23, I.B.E.W.	Electronic Service	No
Jenkins	Alan	aj@jenkinsatlaw.com	Jenkins at Law	Electronic Service	No
Jensen	Linda	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	Yes
Johnson	Richard	Rick.Johnson@lawmoss.com	Moss & Barnett	Electronic Service	Yes
Johnson Phillips	Sarah	sjphillips@stoel.com	Stoel Rives LLP	Electronic Service	No
Kaufman	Mark J.	mkaufman@ibewlocal949.org	IBEW Local Union 949	Electronic Service	No
Kingston	Hudson	hkingston@mncenter.org	MN Center for Environmental Advocacy	Electronic Service	No
Koehler	Thomas	TGK@IBEW160.org	Local Union #160, IBEW	Electronic Service	No
Koeller	Mara	mara.n.koeller@xcelenergy.com	Xcel Energy	Electronic Service	No
Krikava	Michael	mkrikava@briggs.com	Briggs And Morgan, P.A.	Electronic Service	No
Larson	Douglas	dlarson@dakotaelectric.com	Dakota Electric Association	Electronic Service	No
Larson	Peder	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	Electronic Service	No
Lindell	John	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	Yes
Loftus	Matthew P	matthew.p.loftus@xcelenergy.com	Xcel Energy	Electronic Service	No
Maccabee	Paula	Pmaccabee@justchangelaw.com	Just Change Law Offices	Electronic Service	No
Madsen	Peter	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	Yes
Maini	Kavita	kmaini@wi.rr.com	KM Energy Consulting LLC	Electronic Service	No

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Marshall	Pam	pam@energycents.org	Energy CENTS Coalition	Electronic Service	No
Martinka	Mary	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	Electronic Service	Yes
Meloy	Brian	brian.meloy@stinson.com	Stinson,Leonard, Street LLP	Electronic Service	Yes
Meyer	Joseph	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Electronic Service	No
Moeller	David	dmoeller@allete.com	Minnesota Power	Electronic Service	No
Moratzka	Andrew	apmoratzka@stoel.com	Stoel Rives LLP	Electronic Service	Yes
Niles	David W.	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Electronic Service	No
Overland	Carol A.	overland@legalectric.org	Legalectric - Overland Law Office	Electronic Service	No
Oxley	Jeff	jeff.oxley@state.mn.us	Office of Administrative Hearings	Electronic Service	No
Reuther	Kevin	kreuther@mncenter.org	MN Center for Environmental Advocacy	Electronic Service	Yes
Rome	Amanda	amanda.rome@xcelenergy.com	Xcel Energy	Electronic Service	No
Savelkoul	Richard	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	Electronic Service	Yes
Schuchard	Inga	ischuchard@larkinhoffman.com	Larkin Hoffman	Electronic Service	No
Shaddix Elling	Janet	jshaddix@janetshaddix.com	Shaddix And Associates	Electronic Service	Yes
Smith	Ken	ken.smith@districtenergy.com	District Energy St. Paul Inc.	Electronic Service	No
Spangler, Jr.	Ron	rlspangler@otpco.com	Otter Tail Power Company	Electronic Service	No
Starns	Byron E.	byron.starns@stinson.com	Stinson Leonard Street LLP	Electronic Service	No
Strommen	James M.	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	Electronic Service	No
Swanson	Eric	eswanson@winthrop.com	Winthrop Weinstine	Electronic Service	No
Thompson	SaGonna	Regulatory.records@xcelenergy.com	Xcel Energy	Electronic Service	Yes
Veith	Lisa	lisa.veith@ci.stpaul.mn.us	City of St. Paul	Electronic Service	No
Wattenbarger	Adam	awattenbarger@kennedy-graven.com	Kennedy & Graven, Chartered	Electronic Service	No
Wilensky	Scott M.	scott.wilensky@xcelenergy.com	Xcel Energy	Electronic Service	No
Williams	Samantha	swilliams@nrdc.org	Natural Resources Defense Council	Electronic Service	No
Windler	Joseph	jwindler@winthrop.com	Winthrop & Weinstine	Electronic Service	No
Wolf	Daniel P	dan.wolf@state.mn.us	Public Utilities Commission	Electronic Service	Yes
Zomer	Patrick	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	Electronic Service	No