

STATE OF MINNESOTA

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF NORTHERN STATES POWER COMPANY FOR AUTHORITY TO INCREASE RATES FOR ELECTRIC SERVICE IN MINNESOTA	DOCKET NO. E-002/GR-15-826
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PETITION TO INTERVENE OF THE COMMERCIAL GROUP

Pursuant to this Commission’s Notice of and Order for Hearing dated December 22, 2015, the Commercial Group, an ad hoc association of large commercial customers, including JC Penney Corporation, Inc., Macy’s, Inc., Sam’s West, Inc. and Wal-Mart Stores, Inc., hereby respectfully requests leave to intervene in the above-captioned matter.

In support thereof, the Commercial Group respectfully shows the following:

1.

The Commercial Group’s interest and grounds for intervention are based on the following facts:

a. The Commercial Group is an ad hoc group of commercial customers of Northern States Power Company d/b/a Xcel (“Xcel”) that operate retail facilities and distribution centers in Minnesota, a significant number of which are served by Xcel. The Commercial Group participated in Xcel’s last five base rate cases, Docket Nos. E-002/GR-13-868, E-002/GR-12-961, E-002/GR-10-971, E-002/GR-08-1065, and E-002/GR-05-1428.

b. Xcel proposes to substantially increase the rates it charges the Commercial Group. The Commission has proposed to examine in the above docket the rates Xcel charges its commercial customers, which could financially impact the Commercial Group operations. Accordingly, the Commercial Group has an interest in this proceeding.

c. As a group of large commercial customers, the Commercial Group has interests that differ from, and are not adequately represented by, other parties to this proceeding. Moreover, this intervention would not unduly delay the proceedings or prejudice the rights of other parties.

2.

A Notice of Appearance of Alan R. Jenkins is being filed with the Minnesota Public Service Commission. Mr. Jenkins similarly appeared on behalf of the Commercial Group in Docket Nos. E-002/GR-13-868, E-002/GR-05-1428, E-002/GR-08-1065, E-002/GR-10-971, and E-002/GR-12-961. He routinely appears before the Georgia Public Service Commission, which Commission allows out-of-state attorneys to appear before it. Service of any documents is respectfully requested to be made upon the following, and electronic service is accepted:

Alan R. Jenkins
Jenkins at Law, LLC
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WHEREFORE, the Commercial Group respectfully requests that the Commission grant the intervention of the Commercial Group in this docket allowing it to participate fully as a party of record.

This 29th day of December, 2015.

Respectfully submitted,

/S/ Alan R. Jenkins

Alan R. Jenkins
Attorney for the Commercial Group