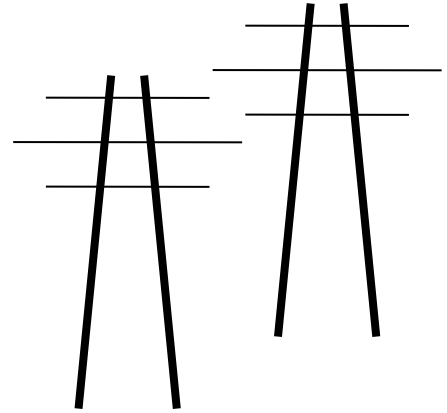


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December 24, 2021

Michelle Severson
Legal Assistant to ALJ Moseng
Office of Administrative Hearings
600 North Robert St.
P.O. Box 64620
St. Paul, MN 55164-0620

via email: michelle.severson@state.mn.us
OAH.efiling.support@state.mn.us

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
OAH Docket No. 22-2500-37994
PUC Docket No. E-002/GR-21-630

Ms. Severson:

Attached please find Overland Petition to Intervene and Notice of Appearance. I am serving NSP/Xcel Energy by filing this Petition and Notice of Appearance via the eDockets system.

I also request to opt in to electronic notice and am emailing these documents, including the Notice of Appearance, to OAH.efiling.support@state.mn.us.

If you have questions or require anything further, do not hesitate to call or email.

Very truly yours,

Carol A. Overland
Attorney at Law

cc: NSP/Xcel Energy and all parties -- eFiled via Public Utilities Commission's eDockets

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS

In the Matter of the Application of Northern States Power
Company d/b/a Xcel Energy for Authority to
Increase Rates for Electric Service in the State
of Minnesota

**NOTICE OF
APPEARANCE**

PLEASE TAKE NOTICE that:

1. The party/agency named below, Carol A. Overland, will appear at the prehearing conference and all subsequent proceedings in the above-entitled matter.

2. By providing its email address below, the Party/Agency acknowledges that it has read and agrees to the terms of the Office of Administrative Hearings' e-Filing policy and chooses to opt into receiving electronic notice from the Office of Administrative Hearings in this matter. **Note: Provision of an email address DOES NOT constitute consent to electronic service from any opposing party or agency in this proceeding.**¹

3. The Party/Agency agrees to use best efforts to provide the Office of Administrative Hearings with the email address(es) for opposing parties and their legal counsel. Notice to Xcel Energy served by eFiling in PUC's eDockets system.

Party's Name, address, email, and phone:

Carol A. Overland
Legalelectric – Overland Law Office
1110 West Avenue
Red Wing, MN 55066

overland@legalelectric.org
(612) 227-8638



Dated: December 24, 2021

Signature of Party/Agency or Attorney

¹ In order to opt in to electronic notice, this form must be emailed to OAH.efiling.support@state.mn.us. If the party does not wish to opt in to electronic notice, this form may be filed with the Office of Administrative Hearings via facsimile, U.S. Mail, or personal service. See Minn. Stat. § 14.58, Minn. R. 1400.5550, subps. 2-5.

STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS

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. 22-2500-37994
PUC Docket No. E-002/GR-21-630

PETITION TO INTERVENE
of
CAROL A. OVERLAND

Carol A. Overland, hereinafter “Overland,” hereby makes this Petition for Intervention as a full party, with all the rights of a party, in the above-captioned Northern States Power/Xcel Energy general rate case docket before the Public Utilities Commission, as provided by Minn. R. 7820.0800 and 7829.2400, Subp. 6. Because the Commission has forwarded this rate case to the Office of Administrative Hearings, Overland will eFile Petition and also file with ALJ Christa Moseng, via legal assistant Michelle Severson, and OAH eFiling Support, and will appear at the Prehearing Conference scheduled for January 10, 2022. A Notice of Appearance is attached.

Overland makes this Petition as an individual, and not in the course of representing any party. As an attorney, Overland has extensive experience representing individuals, groups, and local governments before the Public Utilities Commission, and energy and utility Commissions in other state and federal jurisdictions. Overland’s work with clients at the Commission has focused on many transmission and renewable energy dockets going back over the past twenty-five years, from nuclear waste, to transmission, to coal gasification, wind siting, more

transmission, natural gas, more transmission, rulemaking, transmission planning, public participation, solar siting, and even more transmission!

In this general rate case docket, Overland's specific interest is in rate case treatment of transmission costs and recovery of those costs; a shift from recovery via transmission rider to recovery in general rates; and the notion of transmission capital and service costs and line loss costs as an externality associated with development of renewable energy resources. Overland is also particularly interested in impacts of Federal Energy Regulatory Commission (FERC) and North American Electric Reliability Corporation (NERC) transmission policy, data collection and information, and promotion of transmission on infrastructure development and resultant rate requests. Overland is also interested in rate impacts of renewable mandates and plans for associated retirement of fossil units and correlation of retirements with increased transmission capacity availability and/or new projects in areas with anticipated or planned fossil retirements. Another area of interest is rate treatment of stranded "assets" v. stranded "costs," and how any determinations are made regarding stranded assets and/or costs.

Rate impacts of transmission is particularly important following the permitting and routing of CapX 2020 and MISO MVP Portfolio lines, and the company's interest found in this rate increase petition of moving transmission from a transmission recovery rider into recovery via the general rate. This is even more important as the Petitioner utility is currently embarking on another major transmission buildout, based on the CapX 2020 model, framed as "CapX 2050" via "Grid North Partners." How transmission recovery is handled by the Commission, plus consideration of transmission recovery authorized by FERC, may well determine NSP/Xcel's motivation for or characterization of a claim for need of additional transmission.

While these transmission-focused rate issues are Overland's primary considerations, this framing of issues is not all-inclusive, and Overland reserves the right to raise other issues should they become apparent.

The outcome of the issues raised by Overland will have an impact on transmission need and routing proceedings going forward. None of the parties to this rate case represent the interests of Overland, and Overland's interests are not adequately represented by any party. No party expressly has an interest in the issues raised by Overland.

At this time, Overland, as an individual, requests that this Petition to Intervene, with full rights and responsibilities of a party, be granted.

Respectfully submitted,

December 24, 2021



Carol A. Overland MN #254617
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