

**To: NAESB Wholesale Electric Quadrant Executive Committee**

**From: Xcel Energy Services, Inc.**

**Date: October 3, 2014**

**Re: 2014 WEQ Annual Plan Items 1.a, 1.b, and 1.d / R11020 – Parallel Flow Visualization/Mitigation for Reliability Coordinators in the Eastern Interconnection – Permanent Solution, WEQ-008 Consistency Review, Standards Request R11020**

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Xcel Energy Services, Inc. (“Xcel Energy”), on behalf of its utility operating company affiliates Northern States Power Company, a Minnesota corporation (“NSPM”), Northern States Power Company, a Wisconsin corporation (“NSPW”), Public Service Company of Colorado (“PSCo”), and Southwestern Public Service (“SPS”) (collectively, the “Xcel Energy Operating Companies”), respectfully submits the following comments in response to the Wholesale Electric Quadrant Executive Committee’s September 4, 2014 request for comments.

The Xcel Energy Operating Companies are vertically integrated electric utilities engaged in the business of generating, transmitting, distributing, and selling electric power and energy and related services in an 8 state service territory. Three of the Xcel Energy Operating Companies, NSMP, NSPW, and SPS, operate in the Eastern Interconnection. NSPM and NSPW are members of the Midcontinent Independent System Operator, Inc. (“MISO”) regional transmission organization (“RTO”). SPS is a member of the Southwest Power Pool, Inc. (“SPP”) RTO. PSCo, which operates wholly in the Western Interconnection, would be unaffected by the recommended standards.

Xcel Energy supports the recommendation and appreciates the extensive work done by the WEQ’s Business Practices Subcommittee to develop standards to implement the Parallel Flow Visualization project. We believe that the proposal affords an appropriate amount of

flexibility by allowing for the implementation of different methodologies to govern curtailment processes. We believe that the standards drafted by the BPS should be approved by the WEQ Executive Committee, subject to any revisions that may be needed upon completion of testing.

Respectfully,

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