



414 Nicollet Mall
Minneapolis, MN 55401

February 13, 2014

—Via Electronic Filing—

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: SUPPLEMENTAL REPLY COMMENTS
2012 TRANSMISSION, DISTRIBUTION, AND GENERAL DEPRECIATION STUDY
DOCKET NOS. E,G002/D-12-858

Dear Dr. Haar:

On January 31, 2014, the Minnesota Department of Commerce submitted comments on our October 1, 2013 supplemental filing related to our 2012 Transmission, Distribution, and General Depreciation Study. We appreciate the Department's recommendation for approval of our supplemental filing. The Department also included in their recommendation a requirement that we amortize the theoretical reserve surplus for our electric and common intangible TD&G accounts over the remaining lives of those accounts, so that the depreciation expense for those accounts matches our September 19, 2013 electric rate case compliance filing (Docket No. E002/GR-12-961).

We reviewed our October 1 supplemental filing and acknowledge that Schedule C, showing depreciation expense for the intangible accounts, was not consistent with our rate case compliance filing. To correct this inadvertent discrepancy, Attachment A to this letter provides the corrected version of Schedule C to our October 1 supplemental filing.

We believe Attachment A provides the necessary corrected information related to depreciation expense for our electric and common intangible accounts, making our filings in this docket consistent with our September 19 rate case compliance filing. We appreciate the opportunity to provide this corrected information.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at lisa.h.perkett@xcelenergy or (612) 330-6950 if there are any questions regarding this filing.

Sincerely,

/s/

LISA H. PERKETT
DIRECTOR, CAPITAL ASSET ACCOUNTING

Enclosures
c: Service List

Northern States Power Company
Comparison of Present Reserve to Theoretical Reserve

Common Utility

Utility/ Functional Class	Plant Balance 1/1/2012	Present Annual Accrual	Proposed Annual Accrual	Proposed less Present Change in ASL	Theoretical to Actual Reserve Difference	Difference Amortized Over 8 Years	Total Depreciation Change
Electric Utility							
Intangible	15,217,558	3,043,512	3,043,512	0	417,044	(153,535)	(153,535)
Transmission	1,911,832,463	43,856,740	38,669,188	(5,187,552)	200,466,880	(25,058,360)	(30,245,912)
Distribution - Minnesota Only	2,762,631,816	63,776,968	81,058,252	17,281,285	109,362,353	(13,670,294)	3,610,990
General	263,842,485	17,963,470	16,964,295	(999,175)	6,727,378	(840,922)	(1,840,098)
Total Electric Utility	4,953,524,321	128,640,690	139,735,247	11,094,557	316,973,655	(39,723,112)	(28,628,554)
Gas Utility							
Intangible	3,662,300	732,460	732,460	-	84,177	-	-
Transmission	65,679,681	2,018,813	1,276,375	(742,437)	12,731,083	-	(742,437)
Distribution - Minnesota Only	751,812,663	24,416,645	23,580,006	(836,638)	32,849,618	-	(836,638)
General	39,316,533	3,272,832	3,180,169	(92,663)	1,256,712	-	(92,663)
Total Gas Utility	860,471,176	30,440,749	28,769,010	(1,671,739)	46,921,590	-	(1,671,739)
Common Utility							
Intangible	72,000,048	13,895,648	13,895,648	(0)	(1,405,183)	476,739	476,739
General	186,663,417	12,550,224	12,248,929	(301,295)	(4,258,476)	532,309	231,015
Total Common Utility	258,663,465	26,445,872	26,144,577	(301,295)	(5,663,659)	1,009,049	707,754
Total All Utilities	6,072,658,963	185,527,311	194,648,835	9,121,524	358,231,586	(38,714,063)	(29,592,539)

Northern States Power Company
Comparison of Present Reserve to Theoretical Reserve

Common Utility				As Approved in E,G002/D-07-1528		As Settled in E002/GR-10-971		Proposed				
FERC Account	Account Description	Plant Balance 1/1/2012	(Note)	Annual Rate (%)	Annual Accrual	Annual Rate (%)	Annual Accrual	Annual Rate (ASL)	Annual Accrual (ASL)	ASL Depreciation Change	Reserve Surplus Amortization	Total Depreciation Change
		(a)		(b)	(c) = (a)*(b)/100	(d)	(e) = (a)*(d)/100	(f)	(g) = (a)*(f)/100	(h) = (g) - (e)	(i)	(j) = (h) + (i)
Intangible												
303	Computer Software - 5 year	15,217,558	(1)	20.00	3,043,512	20.00	3,043,512	20.00	3,043,512	-	(153,535)	(153,535)
Total Intangible		15,217,558			3,043,512		3,043,512		3,043,512	-	(153,535)	(153,535)
Transmission												
352	Structures & Improvements	46,878,153		2.22	1,040,695	2.22	1,040,695	1.47	689,385	(351,310)	(597,347)	(948,658)
353	Station Equipment	856,268,539		2.63	22,519,863	2.63	22,519,863	1.96	16,819,561	(5,700,302)	(10,995,882)	(16,696,184)
354	Towers & Fixtures	113,933,667		2.50	2,848,342	1.87	2,132,838	1.93	2,197,292	64,454	(3,584,502)	(3,520,048)
355	Poles & Fixtures	557,866,574		2.44	13,611,944	1.82	10,133,088	2.18	12,147,095	2,014,006	(5,580,628)	(3,566,622)
356	Overhead Conductor & Devices	303,746,575		3.10	9,416,144	2.47	7,492,821	2.06	6,267,786	(1,225,034)	(3,948,384)	(5,173,418)
357	Underground Conduit	12,146,888		1.82	221,073	1.19	144,548	1.37	166,396	21,848	(147,056)	(125,209)
358	Underground Conductor & Devices	20,992,067		2.50	524,802	1.87	392,888	1.82	381,674	(11,214)	(204,561)	(215,774)
Total Transmission		1,911,832,463			50,182,863		43,856,740		38,669,188	(5,187,552)	(25,058,360)	(30,245,912)
Distribution - Minnesota Only												
361	Structures & Improvements	33,530,827		2.89	969,041	2.89	969,041	2.17	726,501	(242,540)	(185,848)	(428,388)
362	Station Equipment	432,935,359		2.89	12,511,832	2.89	12,511,832	2.18	9,445,862	(3,065,969)	(1,652,803)	(4,718,773)
364	Poles, Towers & Fixtures	276,983,831		4.75	13,156,732	3.67	10,176,940	4.55	12,590,174	2,413,234	(2,001,455)	411,779
365	Overhead Conductor & Devices	305,257,633		3.71	11,325,058	2.64	8,055,444	3.08	9,392,543	1,337,099	(1,053,903)	283,196
366	Underground Conduit	195,485,167		2.00	3,909,703	0.92	1,807,456	2.12	4,135,263	2,327,807	(745,236)	1,582,572
367	Underground Conductor & Devices	796,388,991		2.29	18,237,308	1.21	9,638,696	2.22	17,697,533	8,058,837	(3,063,083)	4,995,754
368	Line Transformers	327,056,337	(1)	2.81	9,190,283	1.97	6,429,273	3.28	10,731,536	4,302,263	(2,605,182)	1,697,081
368	Line Capacitors	18,030,013	(1)	4.00	721,201	3.15	568,468	4.40	793,321	224,852	(106,402)	118,451
369	Services - Overhead	67,976,679		3.38	2,297,612	2.53	1,718,654	4.25	2,889,009	1,170,354	(590,986)	579,369
369	Services - Underground	166,419,623		3.38	5,624,983	2.53	4,207,587	2.56	4,261,966	54,379	(932,007)	(877,628)
370	Meters	91,277,436	(1)	6.67	6,088,205	5.82	5,312,347	6.67	6,085,162	772,816	(521,404)	251,411
370	Meters - Old	1,680,974	(2)	5.00	-	4.15	-	5.00	-	-	-	-
373	Street Light & Signal Systems	49,608,946		4.80	2,381,229	4.80	2,381,229	4.66	2,309,382	(71,847)	(211,986)	(283,834)
Total Distribution - Minnesota Only		2,762,631,816			86,413,187		63,776,968		81,058,252	17,281,285	(13,670,294)	3,610,990

Northern States Power Company
Comparison of Present Reserve to Theoretical Reserve

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Common Utility				As Approved in E,G002/D-07-1528		As Settled in E002/GR-10-971		Proposed				
FERC Account	Account Description	Plant Balance 1/1/2012	(Note)	Annual Rate (%)	Annual Accrual	Annual Rate (%)	Annual Accrual	Annual Rate (ASL)	Annual Accrual (ASL)	ASL Depreciation Change	Reserve Surplus Amortization	Total Depreciation Change
		(a)		(b)	(c) = (a)*(b)/100	(d)	(e) = (a)*(d)/100	(f)	(g) = (a)*(f)/100	(h) = (g) - (c)	(i)	(j) = (h) + (i)
General												
390	Structures & Improvements	59,179,857		2.22	1,313,793	2.22	1,313,793	2.11	1,245,892	(67,901)	(382,062)	(449,963)
391	Office Furniture & Equipment	22,857,009	(1)	5.56	1,270,850	5.56	1,270,850	5.00	1,142,850	(127,999)	(62,114)	(190,113)
391	Network Equipment	4,884,082	(1)	25.00	1,221,021	25.00	1,221,021	25.00	1,221,021	-	(19,559)	(19,559)
392	Transportation Equipment - Automobiles	390,265	(1)	18.00	70,248	18.00	70,248	10.00	39,027	(31,221)	(668)	(31,889)
392	Transportation Equipment - Light Trucks	21,025,679	(1)	9.00	1,892,311	9.00	1,892,311	8.33	1,752,140	(140,171)	(46,556)	(186,727)
392	Transportation Equipment - Trailers	7,211,534	(1)	9.00	649,038	9.00	649,038	6.67	480,769	(168,269)	(8,233)	(176,502)
392	Transportation Equipment - Heavy Trucks	41,657,907	(1)	7.92	3,299,306	7.92	3,299,306	7.14	2,975,565	(323,741)	(70,759)	(394,500)
393	Stores Equipment	1,230,683	(1)	5.00	61,534	5.00	61,534	5.00	61,534	-	(3,221)	(3,221)
394	Tools, Shop & Garage Equipment	51,145,841	(1)	6.67	3,411,428	6.67	3,411,428	6.67	3,409,723	(1,705)	(129,990)	(131,694)
395	Laboratory Equipment	3,622,186	(1)	10.00	362,219	10.00	362,219	10.00	362,219	-	(13,973)	(13,973)
396	Power Operated Equipment	20,725,068	(1)	9.00	1,865,256	9.00	1,865,256	8.33	1,727,089	(138,167)	(28,076)	(166,243)
397	Communication Equipment	12,184,390	(1)	11.11	1,353,686	11.11	1,353,686	11.11	1,353,686	-	(31,693)	(31,693)
397	Communication Equipment - Two Way	232,557	(1)	11.11	25,837	11.11	25,837	11.11	25,837	-	(661)	(661)
397	Communication Equipment - AES	4,962,953	(1)	6.67	331,029	6.67	331,029	6.67	331,029	-	(10,249)	(10,249)
397	Communication Equipment - EMS	9,748,526	(1)	6.67	650,227	6.67	650,227	6.67	650,227	-	(22,830)	(22,830)
398	Miscellaneous Equipment	2,783,945	(1)	6.67	185,689	6.67	185,689	6.67	185,689	-	(10,279)	(10,279)
Total General		263,842,485			17,963,470		17,963,470		16,964,295	(999,175)	(840,922)	(1,840,098)
Total Electric Utility		4,953,524,321			157,603,032		128,640,690		139,735,247	11,094,557	(39,723,112)	(28,628,555)

(1): Plant Balance for vintage group (amortized) assets is for the vintages as of 1/1/2012 that are not fully depreciated.

(2): This account is fully depreciated at in 2012

Northern States Power Company
Comparison of Present Reserve to Theoretical Reserve

Common Utility

FERC Account	Account Description	Plant Balance 1/1/2012	(Note)	Depreciation Reserve 1/1/2012	Estimated Net Salvage Rate (%)	Average Service Life	Theoretical Reserve	Actual to Theoretical Reserve Difference	Difference Amortized Over 8 Years
		(a)		(b)	(c)	(d)	(e)	(f) = (b) - (e)	(g) = (f)/8
Intangible									
303	Computer Software - 5 year	15,217,558	(1)	7,367,597	0	5	6,950,553	417,044	(153,535) (3)
Total Intangible		15,217,558		7,367,597			6,950,553	417,044	(153,535)
Transmission									
352	Structures & Improvements	46,878,153		15,348,271	0	68	10,569,494	4,778,777	(597,347)
353	Station Equipment	856,268,539		277,554,258	-10	56	189,587,203	87,967,055	(10,995,882)
354	Towers & Fixtures	113,933,667		91,740,102	-35	70	63,064,084	28,676,018	(3,584,502)
355	Poles & Fixtures	557,866,574		140,344,077	-35	62	95,699,052	44,645,025	(5,580,628)
356	Overhead Conductor & Devices	303,746,575		99,071,932	-30	63	67,484,864	31,587,068	(3,948,384)
357	Underground Conduit	12,146,888		3,742,982	0	73	2,566,531	1,176,452	(147,056)
358	Underground Conductor & Devices	20,992,067		5,132,759	0	55	3,496,274	1,636,485	(204,561)
Total Transmission		1,911,832,463		632,934,381			432,467,501	200,466,880	(25,058,360)
Distribution - Minnesota Only									
361	Structures & Improvements	33,530,827		15,353,500	-30	60	13,866,716	1,486,783	(185,848)
362	Station Equipment	432,935,359		136,541,124	-20	55	123,318,699	13,222,426	(1,652,803)
364	Poles, Towers & Fixtures	276,983,831		165,343,920	-100	44	149,332,277	16,011,643	(2,001,455)
365	Overhead Conductor & Devices	305,257,633		87,064,868	-20	39	78,633,644	8,431,224	(1,053,903)
366	Underground Conduit	195,485,167		61,565,297	-10	52	55,603,411	5,961,886	(745,236)
367	Underground Conductor & Devices	796,388,991		253,046,916	0	45	228,542,255	24,504,662	(3,063,083)
368	Line Transformers	327,056,337	(1)	162,954,214	-5	32	142,112,762	20,841,453	(2,605,182)
368	Line Capacitors	18,030,013	(1)	12,151,454	-10	25	11,300,240	851,214	(106,402)
369	Services - Overhead	67,976,679		48,822,436	-70	40	44,094,549	4,727,887	(590,986)
369	Services - Underground	166,419,623		76,994,920	-5	41	69,538,868	7,456,052	(932,007)
370	Meters	91,277,436	(1)	61,046,782	0	15	56,875,549	4,171,233	(521,404)
370	Meters - Old	1,680,974	(2)	1,680,974	0	20	1,680,974	-	-
373	Street Light & Signal Systems	49,608,946		17,512,581	-35	29	15,816,691	1,695,891	(211,986)
Total Distribution		2,762,631,816		1,100,078,987			990,716,634	109,362,353	(13,670,294)

Northern States Power Company
Comparison of Present Reserve to Theoretical Reserve

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Common Utility

FERC Account	Account Description	Plant Balance 1/1/2012	(Note)	Depreciation Reserve 1/1/2012	Estimated Net Salvage Rate (%)	Average Service Life	Theoretical Reserve	Actual to Theoretical Reserve Difference	Difference Amortized Over 8 Years
		(a)		(b)	(c)	(d)	(e)	(f) = (b) - (c)	(g) = (f)/8
General									
390	Structures & Improvements	59,179,857		26,921,569	-20	57	23,865,074	3,056,495	(382,062)
391	Office Furniture & Equipment	22,857,009	(1)	8,778,503	0	20	8,281,594	496,909	(62,114)
391	Network Equipment	4,884,082	(1)	2,764,304	0	4	2,607,830	156,474	(19,559)
392	Transportation Equipment - Automobiles	390,265	(1)	94,451	0	10	89,105	5,346	(668)
392	Transportation Equipment - Light Trucks	21,025,679	(1)	6,579,723	0	12	6,207,276	372,447	(46,556)
392	Transportation Equipment - Trailers	7,211,534	(1)	1,163,591	0	15	1,097,725	65,866	(8,233)
392	Transportation Equipment - Heavy Trucks	41,657,907	(1)	10,000,297	0	14	9,434,228	566,069	(70,759)
393	Stores Equipment	1,230,683	(1)	455,176	0	20	429,411	25,765	(3,221)
394	Tools, Shop & Garage Equipment	51,145,841	(1)	18,371,395	0	15	17,331,479	1,039,916	(129,990)
395	Laboratory Equipment	3,622,186	(1)	1,974,806	0	10	1,863,022	111,784	(13,973)
396	Power Operated Equipment	20,725,068	(1)	3,968,021	0	12	3,743,411	224,610	(28,076)
397	Communication Equipment	12,184,390	(1)	4,479,135	0	9	4,225,592	253,543	(31,693)
397	Communication Equipment - Two Way	232,557	(1)	93,346	0	9	88,062	5,284	(661)
397	Communication Equipment - EMS	4,962,953	(1)	1,448,553	0	15	1,366,558	81,996	(10,249)
397	Communication Equipment - AMR	9,748,526	(1)	3,226,532	0	15	3,043,893	182,639	(22,830)
398	Miscellaneous Equipment	2,783,945	(1)	1,452,786	0	15	1,370,550	82,236	(10,279)
Total General		263,842,485		91,772,188			85,044,810	6,727,378	(840,922)
Total Electric Utility		4,953,524,321		1,832,153,153			1,515,179,498	316,973,655	(39,723,112)

(1): Plant Balance for vintage group (amortized) assets is for the vintages as of 1/1/2012 that are not fully depreciated.

(2): This account is fully depreciated at in 2012

(3): Electric Intangible has an average remaining life shorter than 8 years. Electric Intangible theoretical reserve difference being amortized over 2.72 years.

Northern States Power Company
Comparison of Present Reserve to Theoretical Reserve

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Common Utility

FERC Account	Account Description	Plant Balance 1/1/2012	(Note)	As Approved in E,G002/D-07-1528		Proposed		
				Annual Rate (%)	Annual Accrual	Annual Rate (ASL)	Annual Accrual (ASL)	Depreciation Change
		(a)		(b)	(c) = (a)*(b)/100	(d)	(e) = (a)*(d)/100	(f) = (e) - (c)
Intangible								
303	Computer Software - 5 year	3,662,300	(1)	20.00	732,460	20.00	732,460	-
Total Intangible		3,662,300			732,460		732,460	-
Transmission								
366	Structures & Improvements	1,017,205		2.44	24,820	2.02	20,540	(4,280)
367	Mains	53,675,877		2.89	1,551,233	1.53	823,030	(728,203)
369	Measure & Regulating Station Equipment	10,986,598		4.03	442,760	3.94	432,805	(9,955)
Total Transmission		65,679,681			2,018,813		1,276,375	(742,437)
Distribution - Minnesota Only								
375	Structures & Improvements	55,163		2.44	1,346	2.44	1,345	(1)
376	Mains - Metallic	80,789,038		2.89	2,334,803	2.35	1,900,919	(433,885)
376	Mains - Plastic	307,169,652		2.56	7,863,543	2.56	7,849,891	(13,652)
378	Measure & Regulating Station Equipment - General	6,005,195		4.03	242,009	3.29	197,539	(44,470)
379	Measure & Regulating Station Equipment - City Gate	1,773,490		4.03	71,472	2.68	47,604	(23,867)
380	Services - Metallic	11,675,526		3.25	379,455	3.50	408,643	29,189
380	Services - Plastic	250,603,763		3.25	8,144,622	3.33	8,353,459	208,836
381	Meters	90,268,507	(1)	5.75	5,190,439	5.15	4,648,828	(541,611)
381	Meters - Telemetry	36,778	(2)	12.50	-	12.50	-	-
383	House Regulators	3,435,550	(1)	5.50	188,955	5.00	171,778	(17,178)
Total Distribution - Minnesota Only		751,812,663			24,416,645		23,580,006	(836,638)

Northern States Power Company
Comparison of Present Reserve to Theoretical Reserve

Common Utility

FERC Account	Account Description	Plant Balance 1/1/2012	(Note)	As Approved in E,G002/D-07-1528		Proposed		
				Annual Rate (%)	Annual Accrual	Annual Rate (ASL)	Annual Accrual (ASL)	Depreciation Change
		(a)		(b)	(c) = (a)*(b)/100	(d)	(e) = (a)*(d)/100	(f) = (e) - (c)
General								
390	Structures & Improvements	1,945,425		2.22	43,188	2.18	42,446	(743)
391	Office Furniture & Equipment	877,862	(1)	5.56	48,809	5.00	43,893	(4,916)
391	Network Equipment	37,566	(1)	25.00	9,391	25.00	9,391	-
392	Transportation Equipment - Automobiles	83,716	(1)	18.00	15,069	10.00	8,372	(6,697)
392	Transportation Equipment - Light Trucks	3,556,524	(1)	9.00	320,087	8.33	296,377	(23,710)
392	Transportation Equipment - Trailers	661,434	(1)	9.00	59,529	6.67	44,096	(15,433)
392	Transportation Equipment - Heavy Trucks	4,827,305	(1)	7.92	382,323	7.14	344,808	(37,515)
393	Stores Equipment	10,091	(1)	5.00	505	5.00	505	-
394	Tools, Shop & Garage Equipment	4,305,799	(1)	6.67	287,197	6.67	287,197	-
396	Power Operated Equipment	547,294	(1)	9.00	49,256	8.33	45,608	(3,649)
397	Communication Equipment	12,593,714	(1)	11.11	1,399,162	11.11	1,399,162	-
397	Communication Equipment - EMS	5,634,650	(1)	6.67	375,831	6.67	375,831	-
397	Communication Equipment - AMR	4,166,157	(1)	6.67	277,883	6.67	277,883	-
398	Miscellaneous Equipment	68,994	(1)	6.67	4,602	6.67	4,602	-
Total General		39,316,533			3,272,832		3,180,169	(92,663)
Total Gas Utility		860,471,176			30,440,749		28,769,010	(1,671,739)

(1): Plant Balance for vintage group (amortized) assets is for the vintages as of 1/1/2012 that are not fully depreciated.

(2): This account is fully depreciated at in 2012

Northern States Power Company
Comparison of Present Reserve to Theoretical Reserve

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Common Utility

FERC Account	Account Description	Plant Balance 1/1/2012	(Note)	Depreciation Reserve 1/1/2012	Estimated Net Salvage Rate (%)	Average Service Life	Theoretical Reserve	Actual to Theoretical Reserve Difference
		(a)		(b)	(c)	(d)	(e)	(f) = (b) - (e)
Intangible								
303	Computer Software - 5 year	3,662,300	(1)	977,047	0	5	892,870	84,177
Total Intangible		3,662,300		977,047			892,870	84,177
Transmission								
366	Structures & Improvements	1,017,205		639,031	-5	52	373,255	265,777
367	Mains	53,675,877		20,682,288	-15	75	11,098,447	9,583,841
369	Measure & Regulating Station Equipment	10,986,598		6,333,058	-30	33	3,451,593	2,881,465
Total Transmission		65,679,681		27,654,378			14,923,295	12,731,083
Distribution - Minnesota Only								
375	Structures & Improvements	55,163		33,294	0	41	30,688	2,605
376	Mains - Metallic	80,789,038		39,025,533	-20	51	35,090,207	3,935,326
376	Mains - Plastic	307,169,652		104,479,744	-15	45	93,944,030	10,535,714
378	Measure & Regulating Station Equipment - General	6,005,195		2,657,298	-25	38	2,389,337	267,961
379	Measure & Regulating Station Equipment - City Gate	1,773,490		226,166	-2	38	203,359	22,806
380	Services - Metallic	11,675,526		12,725,546	-40	40	11,443,780	1,281,766
380	Services - Plastic	250,603,763		121,222,944	-30	39	108,998,849	12,224,095
381	Meters	90,268,507	(1)	56,598,615	-3	20	52,223,970	4,374,645
381	Meters - Telemetering	36,778	(2)	-	0	8	-	-
383	House Regulators	3,435,550	(1)	3,344,936	0	20	3,140,237	204,699
Total Distribution - Minnesota Only		751,812,663		340,314,074			307,464,456	32,849,618

Northern States Power Company
Comparison of Present Reserve to Theoretical Reserve

Common Utility

FERC Account	Account Description	Plant Balance 1/1/2012	(Note)	Depreciation Reserve 1/1/2012	Estimated Net Salvage Rate (%)	Average Service Life	Theoretical Reserve	Actual to Theoretical Reserve Difference
		(a)		(b)	(c)	(d)	(e)	(f) = (b) - (e)
General								
390	Structures & Improvements	1,945,425		333,436	-20	55	295,667	37,770
391	Office Furniture & Equipment	877,862	(1)	228,998	0	20	209,498	19,500
391	Network Equipment	37,566	(1)	11,935	0	4	10,907	1,028
392	Transportation Equipment - Automobiles	83,716	(1)	68,189	0	10	62,314	5,875
392	Transportation Equipment - Light Trucks	3,556,524	(1)	1,121,778	0	12	1,025,131	96,647
392	Transportation Equipment - Trailers	661,434	(1)	205,482	0	15	187,779	17,703
392	Transportation Equipment - Heavy Trucks	4,827,305	(1)	1,471,517	0	14	1,344,738	126,779
393	Stores Equipment	10,091	(1)	276	0	20	252	24
394	Tools, Shop & Garage Equipment	4,305,799	(1)	2,496,801	0	15	2,281,689	215,112
396	Power Operated Equipment	547,294	(1)	184,431	0	12	168,542	15,889
397	Communication Equipment	12,593,714	(1)	5,260,893	0	9	4,807,641	453,252
397	Communication Equipment - AES	5,634,650	(1)	1,351,840	0	15	1,235,372	116,468
397	Communication Equipment - EMS	4,166,157	(1)	1,701,543	0	15	1,554,946	146,597
398	Miscellaneous Equipment	68,994	(1)	47,221	0	15	43,152	4,069
Total General		39,316,533		14,484,340			13,227,628	1,256,712
Total Gas Utility		860,471,176		383,429,839			336,508,249	46,921,590

(1): Plant Balance for vintage group (amortized) assets is for the vintages as of 1/1/2012 that are not fully depreciated.

(2): This account is fully depreciated at in 2012

Northern States Power Company
Comparison of Present Reserve to Theoretical Reserve

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Common Utility

FERC Account	Account Description	Plant Balance 1/1/2012 (a)	(Note)	As Approved in E,G002/D-07-1528		Proposed				
				Annual Rate (%) (b)	Annual Accrual (c) = (a)*(b)/100	Annual Rate (ASL) (d)	Annual Accrual (ASL) (e) = (a)*(d)/100	ASL Depreciation Change (f) = (e) - (c)	Reserve Surplus Amortization (g)	Total Depreciation Change (h) = (f) + (g)
Intangible										
303	Computer Software - 3 year	-	(2)	33.33	-	33.33	-	-	-	-
303	Computer Software - 5 year	63,386,881	(2)	20.00	12,677,376	20.00	12,677,376	-	473,384	473,384
303	Computer Software - 7 year	8,328,954	(2)	14.29	1,189,851	14.29	1,189,851	-	-	-
303	Computer Software - 10 year	284,213	(2)	10.00	28,421	10.00	28,421	-	3,355	3,355
Total Intangible		72,000,048			13,895,648		13,895,648	-	476,739	476,739
General										
390	Structures & Improvements	115,747,921		2.22	2,569,604	2.18	2,525,409	(44,195)	305,387	261,192
390	Structures & Improvements - Leasehold Improvements	1,163,412		10.53	122,507	10.00	116,341	(6,166)	5,858	(308)
391	Office Furniture & Equipment	23,397,579	(2)	5.56	1,300,905	5.00	1,169,879	(131,026)	85,037	(45,989)
391	Network Equipment	27,288,817	(2)	25.00	6,822,204	25.00	6,822,204	-	76,521	76,521
392	Transportation Equipment - Automobiles	319,097	(2)	18.00	57,437	10.00	31,910	(25,528)	665	(24,863)
392	Transportation Equipment - Light Trucks	4,350,598	(2)	9.00	391,554	8.33	362,550	(29,004)	14,723	(14,281)
392	Transportation Equipment - Trailers	1,125,686	(2)	9.00	101,312	6.67	75,046	(26,266)	2,279	(23,987)
392	Transportation Equipment - Heavy Trucks	4,425,984	(2)	7.92	350,538	7.14	316,142	(34,396)	11,547	(22,849)
393	Stores Equipment	9,136	(2)	5.00	457	5.00	457	-	6	6
394	Tools, Shop & Garage Equipment	2,173,877	(2)	6.67	144,998	6.67	144,998	-	4,723	4,723
395	Laboratory Equipment	36,686	(2)	10.00	3,669	10.00	3,669	-	184	184
396	Power Operated Equipment	707,031	(2)	9.00	63,633	8.33	58,919	(4,714)	1,545	(3,168)
397	Communication Equipment	1,367,560	(2)	11.11	151,936	11.11	151,936	-	5,219	5,219
397	Communication Equipment - Two Way	3,738,356	(2)	11.11	415,331	11.11	415,331	-	15,360	15,360
398	Miscellaneous Equipment	811,679	(2)	6.67	54,139	6.67	54,139	-	3,255	3,255
Total General		186,663,417			12,550,224		12,248,929	(301,295)	532,309	231,015
Total Common Utility		258,663,465			26,445,872		26,144,577	(301,295)	1,009,049	707,754

(1): Plant Balance as of 1/1/2012 has been adjusted for known retirements that occurred in the first six months of 2012.

(2): Plant Balance for vintage group (amortized) assets is for the vintages as of 1/1/2012 that are not fully depreciated.

Northern States Power Company
Comparison of Present Reserve to Theoretical Reserve

Common Utility

FERC Account	Account Description	Plant Balance 1/1/2012	(Note)	Depreciation Reserve 1/1/2012	Estimated Net Salvage Rate (%)	Average Service Life	Theoretical Reserve	Actual to Theoretical Reserve Difference	Difference Amortized Over 8 Years
		(a)		(b)	(c)	(d)	(e)	(f) = (b) - (e)	(g) = (f)/8
Intangible									
303	Computer Software - 3 year	-	(2)	-	0	3	-	-	-
303	Computer Software - 5 year	63,386,881	(2)	24,666,948	0	5	26,062,241	(1,395,293)	473,384
303	Computer Software - 7 year	8,328,954	(2)	7,734,029	0	7	7,734,029	-	-
303	Computer Software - 10 year	284,213	(2)	174,848	0	10	184,738	(9,890)	3,355
Total Intangible		72,000,048		32,575,825			33,981,008	(1,405,183)	476,739
General									
390	Structures & Improvements	115,747,921		24,851,017	-20	55	27,294,114	(2,443,097)	305,387
390	Structures & Improvements - Leasehold Improvements	1,163,412		476,674	0	10	523,535	(46,862)	5,858
391	Office Furniture & Equipment	23,397,579	(2)	12,026,756	0	20	12,707,053	(680,297)	85,037
391	Network Equipment	27,288,817	(2)	10,822,362	0	4	11,434,532	(612,170)	76,521
392	Transportation Equipment - Automobiles	319,097	(2)	93,990	0	10	99,307	(5,317)	665
392	Transportation Equipment - Light Trucks	4,350,598	(2)	2,082,324	0	12	2,200,111	(117,787)	14,723
392	Transportation Equipment - Trailers	1,125,686	(2)	322,385	0	15	340,621	(18,236)	2,279
392	Transportation Equipment - Heavy Trucks	4,425,984	(2)	1,633,134	0	14	1,725,513	(92,379)	11,547
393	Stores Equipment	9,136	(2)	801	0	20	846	(45)	6
394	Tools, Shop & Garage Equipment	2,173,877	(2)	668,007	0	15	705,793	(37,786)	4,723
395	Laboratory Equipment	36,686	(2)	26,042	0	10	27,515	(1,473)	184
396	Power Operated Equipment	707,031	(2)	218,544	0	12	230,906	(12,362)	1,545
397	Communication Equipment	1,367,560	(2)	738,108	0	9	779,859	(41,751)	5,219
397	Communication Equipment - Two Way	3,738,356	(2)	2,172,302	0	9	2,295,179	(122,877)	15,360
398	Miscellaneous Equipment	811,679	(2)	460,285	0	15	486,322	(26,037)	3,255
Total General		186,663,417		56,592,731			60,851,207	(4,258,476)	532,309
Total Common Utility		<u>258,663,465</u>		<u>89,168,556</u>			<u>94,832,215</u>	<u>(5,663,659)</u>	<u>1,009,049</u>

(1): Plant Balance as of 1/1/2012 has been adjusted for known retirements that occurred in the first six months of 2012.

(2): Plant Balance for vintage group (amortized) assets is for the vintages as of 1/1/2012 that are not fully depreciated.

(3): Common Intangible has an average remaining life shorter than 8 years. Common Intangible theoretical reserve difference being amortized over 2.95 years.

CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies of the foregoing document or a summary thereof on the attached list of persons.

xx by depositing a true and correct copy or summary thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota; or

xx via electronic filing

Docket No. E,G002/D-12-858

Dated this 13th of February 2014

/s/

SaGonna Thompson

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