

January 21, 2015

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101(

RE: Comments by Department of Commerce Regarding Northern States Power Company,
d/b/a Xcel Energy's Request for Extension
2015 Annual Review of Remaining Lives
Docket No. E,G002/D-15-46

Dear Mr. Wolf:

The Minnesota Department of Commerce, Division of Energy of Resources, (Department or DOC) provides brief comments for the Minnesota Public Utilities Commission's (Commission) consideration regarding Northern States Power Company, d/b/a Xcel Energy's (Xcel or the Company) request for an extension from February 17, 2015 to May 18, 2015 to file Xcel's *2015 Annual Review of Remaining Lives* petition. The Company noted in its January 14, 2015 extension request that the reason for the extension was to allow the Commission to rule on Xcel's pending rate case in Docket No. E002/GR-13-868 and on the Commission's inquiry into decommissioning policies in Docket No. E,G999/CI-13-626.

The Department notes that it may be helpful to see Xcel's *2015 Remaining Lives* petition sooner rather than later, particularly if the Commission would like to take administrative notice of this information in the current Xcel rate case (Docket No. E002/GR-13-868) or believes that this information would assist the Commission in making decisions. However, the Department does not object to Xcel's request. There are depreciation-related issues that, if resolved first in the rate case, would allow Xcel's *2015 Annual Review of Remaining Lives* petition to reflect the decisions made in the rate case. Allowing the rate case decisions to occur first would avoid the potential for a decision in Xcel's *2015 Annual Review of Remaining Lives* docket to conflict with or undermine a Commission decision in the rate case. As for the Commission's inquiry into decommissioning policies, the Department does not have an opinion as to whether a ruling by the Commission on Docket No. E,G999/CI-13-626 needs to occur prior to Xcel's *2015 Annual Review of Remaining Lives* petition.

In conclusion, the Department defers to the Commission on the question of whether having the depreciation information sooner would be helpful for the Commission, but would not object to a Commission decision to grant Xcel's request for an extension to file the Company's *2015 Annual Review of Remaining Lives* petition.

Sincerely,

NANCY A. CAMPBELL
Financial Analyst

NAC/ja

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Comments**

Docket No. E,G002/D-15-46

Dated this 21st day of January 2015

/s/Sharon Ferguson

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