COMMERCE DEPARTMENT

December 24, 2018

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E,G002/S-18-654

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Petition of Northern States Power Company for Approval of Capital Structure for Issuance of Long-Term and Short-Term Securities for 2019.

The petition was filed on October 23, 2018 by:

Sarah W. Soong
Vice President and Treasurer
Xcel Energy Services Inc.
414 Nicollet Mall (401 – 4th Floor)
Minneapolis, MN 55401

The Department recommends **approval** and is available to respond to any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ EILON AMIT
Statistical Analyst

EA/ja
Attachment

COMMERCE DEPARTMENT

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. E,G002/S-18-654

I. BACKGROUND

On October 23, 2018, Minnesota Corporation Northern States Power Company (NSP-MN[1] or the Company) filed a petition regarding its 2019 capital structure. The petition requests that the Minnesota Public Utilities Commission (Commission) do the following by March 1, 2019:

- Approve NSP-MN's proposed 2019 capital structure (including total capitalization); effective until the Commission approves NSP-MN's 2020 capital structure;
- Continue to allow NSP-MN to issue securities, provided that NSP-MN's capital structure does not go outside approved levels for more than 60 days;
- Continue to allow NSP-MN to use risk management instruments that qualify for hedge accounting treatment;
- Continue to allow NSP-MN to treat borrowing under multi-year credit agreements as short-term debt, by varying Minn. Rules 7825.1000, subp. 6; and
- Grant NSP-MN the discretion to enter into tax-exempt financings for pollution control construction programs.

On December 4, 2018, NSP-MN filed a revised Petition to recognize the pending acquisition from Southern Power Company of the 375 MW Mankato Energy Center (MEC I) and the 345 MW extension project (MEC II), scheduled to go in-service in June 2019, as described in the Company's Petition in Docket No. IP6949, E002/PA-18-702.

[1] There is another Northern States Power Incorporated in Wisconsin; hence, the Department uses the shorthand "NSP-MN" instead of only "NSP."

II. DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) provides background information, reviews the completeness of NSP-MN's petition, reviews NSP-MN's compliance with ongoing requirements related to the security issuances, and analyzes each of NSP-MN's requests. Additionally, the Department analyzes the Company's proposed changes as related to the proposed acquisition of MEC I and MEC II.

A. BACKGROUND

NSP-MN is a utility providing electricity to about 1.5 million customers in Minnesota, North Dakota, and South Dakota and natural gas to about 0.5 million customers in Minnesota and North Dakota. NSP-MN is a wholly owned subsidiary of Xcel Energy Inc. (XEI), but has its own capital structure and issues its own debt securities. (NSP-MN does not issue its own equity securities and instead receives equity infusions from XEI). NSP-MN currently maintains a credit rating of A- from Standard & Poor's (S&P), several notches above the investment-grade minimum of BBB-.

To issue securities, NSP-MN needs approval under Minn. Stat. § 216B.49 and approval of its capital structure per Minn. Rules 7825.1100. Upon issuing securities, NSP-MN must then typically remain within the approved capital structure.

NSP-MN is also required to request approval of its capital structure each year through annual capital structure filings.[2] Therefore, NSP-MN's annual capital structure filing must also request approval to issue securities any time NSP-MN intends to issue securities during the period the capital structure will be in effect.

Because NSP-MN intends to issue securities during the 2019 capital-structure period, NSP-MN has submitted a petition requesting both authorization to issue securities and approval of its 2019 capital structure. The Commission approved NSP-MN's most recent capital structure and securities issuances in an Order issued on June 20, 2018 in Docket No. E,G002/S-17-767, with the capital structure effective until the Commission issues its Order regarding NSP-MN's 2019 capital structure (in this docket).

B. COMPLETENESS OF NSP-MN'S PETITION

NSP-MN's capital-structure/security-issuance filings must comply with a multitude of reporting requirements from Minnesota Administrative Rules and prior Commission Orders, summarized in Attachment 2 to these comments. The Department has reviewed NSP-MN's petition,

[2] *Order Approving Capital Structure with Limitations* issued January 13, 2003 in Docket No. E,G002/S-02-1907.

including the Revised Petition, and concludes that it complies with all applicable reporting requirements.

C. ONGOING COMPLIANCE REQUIREMENTS

NSP-MN must comply with a variety of ongoing compliance requirements related to its capital structure and security issuances, summarized in Table 1 below. The Department concludes that NSP-MN continues to comply with these requirements.

Table 1: Ongoing Compliance Requirements
Related to NSP-MN-s Capital Structure and Security Issuances

Source	Requirement
7-9-2004 Order in E,G002/AI-04-100	NSP-MN must not use the Utility Money Pool if it can borrow directly from a bank or other financial institution at a lower rate.
	NSP-MN can lend to the Utility Money Pool only if the returns on investment are equal to or greater than returns NSP-MN could have received elsewhere.
1-13-2003 Order in E,G002/S-02-1907	File capital structures annually.
	Encumber no utility property in Minnesota for purposes other than operating the utility, and use no Minnesota property for non-utilities purposes.
	Make no-inter-company loans to Xcel Energy Inc.

D. NSP-MN'S PROPOSED 2019 CAPITAL STRUCTURE AND DURATION OF APPROVAL

NSP-MN's initially requested 2019 capital structure consisted of a limit on total capitalization of $12.7 billion, with 47.07 percent to 57.53 percent of capital to be financed by common equity and up to 15 percent financed by short-term debt (with the remainder financed by long-term debt). NSP-MN also requested that the Commission make the approval effective until the Commission issues its Order regarding NSP-MN's 2020 capital structure. The Company initially requested approval of the following 2019 capital structures (in Millions $):

December 31, 2019 forecast		%
Common equity	$6,366	52.3%
Short-term debt	$168	1.4%
Credit facility borrowing	$0	0.0%
Total short-term debt	$168	1.4%
Long-term debt	$5,633	46.3%
Total capitalization	$12,167	100.0%
2019 Contingency	$533	
Total Capitalization + Contingency	$12,700	

In its revised petition, the Company requested approval of the following capital structure (in Millions $):

December 31, 2019 forecast		%
Common equity	$6,709	52.3%
Short-term debt	$278	2.2%
Credit facility borrowing	$0	0.0%
Total short-term debt	$278	2.2%
Long-term debt	$5,833	45.5%
Total capitalization	$12,820	100.0%
2019 Contingency	$580	
Total Capitalization + Contingency	$13,400	

1. *Total Capitalization*

NSP-MN's originally requested limit on total capitalization of $12.7 billion is equal to NSP-MN's expected capitalization of $12.167 billion plus a cushion of $0.533 billion in case NSP-MN needs more capital than expected. The request is $1.2 billion more than the $11.5 billion limit approved for 2018, due to NSP-MN expecting to spend more on capital this year. The Department concludes that NSP-MN's limit as requested in the Company's original Petition is reasonable; as NSP-MN has an incentive to minimize its capital costs between rate cases.
In its revised Petition, the Company requested approval of $13.4 billion including contingency amount of $580 million. Compared to the original Petition, the requested $13.4 billion of the revised Petition is $0.7 billion more than the $12.7 billion requested in the Original Petition. The revised petition is $1.9 billion more than the $11.5 billion limit approved for 2018. Also, the requested contingency under the revised Petition ($580 million) is $47 million more than the contingency amount ($533 million) requested under the original Petition. The increased total capitalization requested by the Company in its revised Petition reflects the Company's need to finance its acquisition of MEC I and MEC II.

The equity ratio under both the initial petition and the revised petition is 52.3 percent, which is slightly less than the equity ratio of 52.4 percent approved for 2018. The effect of the revised petition was a slight shift (8 basis points) from long-term debt to short-term debt. The Department concludes that the Company's revised requested total capitalization and its revised contingency are reasonable if its petition for acquiring MEC I and MEC II is approved by the Commission and the in-service date commences sometime during 2019.

2. Common Equity Ratio

NSP-MN's requested common equity ratio of 47.07 percent to 57.53 percent is a ±10 percent (not percentage point) range around a midpoint of 52.3 percent.[3] In its revised petition the Company requests the same equity ratios as in its original petition. The Department first reviews NSP-MN's requested midpoint of 52.3 percent and then reviews the ±10 percent range.

The Department concludes that NSP-MN's proposed midpoint is reasonable, for the following reasons. NSP-MN's requested midpoint of 52.3 percent is 0.2 percentage points lower than NSP-MN's actual equity ratio as of June 30, 2018 of 52.5 percent. As over the past year NSP-MN has avoided financial distress and maintained a long-term issuer rating of A- from S&P, NSP-MN's proposed midpoint does not appear too low as to unduly risk financial distress or harm NSP-MN's ability to access capital on reasonable terms. Moreover, the Company's requested equity ratio of 52.3 percent is essentially the same as approved by the Commission for the 2018 capital structure. (Docket No. E,G002/S-17-767).

The Department notes that the 52.3 percent equity ratio requested by the Company is significantly higher than the mean equity ratio for the comparable group (electric utilities with S&P credit rating in the range BBB to A+ (DOC Attachment No. 1). The mean of this comparable group is 45.1 percent. However, such higher equity ratio allows the Company to borrow long-term debt at lower interest rates. Additionally, between rate cases the Company has an incentive to have an equity ratio that minimizes its overall total capital cost. For all the reasons discussed above, the Department concludes that the Company-requested equity ratio is reasonable.

Regarding the 10 percent range, it has been in place for over a decade and appears to have worked well during that time. Therefore, the range has historically served its purpose of providing NSP-MN with adequate short-term financial flexibility while not unduly risking harm to ratepayers. Particularly as NSP-MN has maintained an actual equity ratio within the midpoint of this range, the Department sees no reason for a change in course and therefore recommends that the Commission continue to approve the ±10 percent range.

[3] Ten percent of 53.2% is 5.23% minus 5.23% equals 47.07% and 52.3% plus 5.23% equals 57.53%.

3. Short-Term Debt Ratio

Like the ±10 percent range, the 15 percent cap on short-term debt—which has also been in effect for over a decade—has historically worked to serve its purpose of providing NSP-MN with adequate short-term financial flexibility while not unduly risking harm to ratepayers. Particularly as last year NSP-MN maintained an actual short-term debt ratio of only 0.6 percent and continues to be rated as investment grade, the Department sees no reason for a change in course and therefore recommends that the Commission continue to approve the 15 percent cap.

4. Duration of Approval

NSP-MN requests that the Commission's approval of NSP-MN's capital structure be effective until the Commission issues an Order regarding NSP-MN's 2020 capital structure. The Department views this request as reasonable, particularly as the Commission authorized the same timing structure for NSP-MN's 2018 capital structure (*i.e.*, it is effective until the Commission issues an Order regarding NSP-MN's 2019 capital structure in the instant docket). The request is also consistent with the timing requirements in Minn. Rules 7825.1100.[4] For these reasons, the Department recommends that the Commission approve NSP-MN's requested effective length.

E. ALLOW NSP-MN TO ISSUE SECURITIES, PROVIDED NSP-MN REMAINS WITHIN THE APPROVED CAPITAL STRCUTURE

NSP-MN requests that the Commission allow NSP-MN to issue securities, as long as NSP-MN's capital structure does not go outside approved levels for more than 60 days without NSP-MN notifying the Commission. NSP-MN needs approval of this request because NSP-MN anticipates issuing debt securities to help finance its 2019 construction spending, fund ongoing operations, and provide loans to one of NSP-MN's wholly-owned subsidiaries, NSP Nuclear Corporation.

As specified in Minn. Stat. § 216B.49, subd. 4, to approve a security issuance, the Commission must find that the issuance is the public interest, which requires that the types of capital issued (common equity, short-term debt, long-term debt, etc.) bear a reasonable proportion to each other and to the value of the property, and that the issuance not harm ratepayers. The Department concludes that NSP-MN's request will satisfy these criteria if modified to require Commission preapproval to exceed the 60-day grace period. Otherwise, NSP-MN would be able to go outside the bounds of its allowed capital structure for an indefinite amount of time

[4] Minn. Rules 7825.1100 states in relevant part: "Commission Orders approving capital structure shall be effective for at least one year, unless otherwise stated, or until the petitioner requests modification or revision; or until the commission deems conditions affecting capital structure have changed sufficiently to warrant further review."

without Commission approval. Therefore, the Department recommends that the Commission approve NSP-MN's request as modified to require preapproval to exceed the 60-day grace period.

F. RISK-MANAGEMENT INSTRUMENTS

NSP-MN requests that the Commission continue to allow the Company to use risk management instruments that qualify for hedge accounting treatment under Accounting Standard Codification No. 815 (such as interest rate swaps), in compliance with the policies of NSP-MN's parent company (XEI) and with required officer approvals. It appears that NSP-MN would primarily or exclusively use such instruments to hedge against the risk of changing interest rates.

The Department agrees with NSP-MN that risk-management instruments such as interest rate swaps can benefit ratepayers as long as NSP-MN follows prudent corporate guidelines in its usage of such instruments and allows the Commission sufficient oversight, which is achieved through the Department's recommended risk-management reporting requirement discussed later in these comments. Therefore, the Department recommends that the Commission approve NSP-MN's request with the reporting requirements recommended below.

G. NSP-MN'S PROPOSAL TO TREAT BORROWING UNDER MULTI-YEAR CREDIT AGREEMENTS AS SH0RT-TERM DEBT, BY VARYING MINN. RULES 7825.1000, SUBP. 6

NSP-MN requests to classify direct borrowing under any multi-year credit agreements as short-term debt. Because Minn. Rules part 7825.1000, subpart 6 defines short-term securities as those with a date of maturity of no more than one year, to classify multi-year credit agreements as short-term debt, NSP-MN needs the Commission to vary Minn. Rules 7825.1000, subp. 6.

To vary its rules, the Commission must determine, per Minn. Rules 7829.3200, subp. 1, that three requirements are met:

1. Enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule,

2. Granting the variance would not adversely affect the public interest, and

3. Granting the variance would not conflict with standards imposed by law.

The Department agrees with NSP-MN that these requirements are met. NSP-MN's current multi-year credit agreement resembles traditional short-term debt instruments and classifying multi-year credit agreements as long-debt could cause credit-rating agencies to react unfavorably, thus imposing an excessive burden on NSP-MN and hurting ratepayers. In addition, classifying multi-year credit agreements as short-term debt would not conflict with any standards imposed by law. Therefore, the Department recommends that the Commission continue to vary Minn. Rules 7825.1000, subp. 6, and allow NSP-MN to treat borrowing under multi-year credit agreements as short-term debt. (The Commission has made the same variance and allowance for all approvals of NSP-MN's capital structure since 2005).

H. NSP-MN'S PROPOSAL TO ENTER INTO CERTAIN OTHER FINANCINGS

NSP-MN requests that the Commission allow the Company to enter into two types of financings that NSP-MN is currently exploring as a possibility: financings to replace outstanding long-term debt instruments with less expensive securities, and tax-exempt financings for pollution-control construction programs. As both types of financings would reduce costs to ratepayers, the Department recommends that the Commission grant NSP-MN's request. However, to ensure adequate oversight, the Department also recommends that the Commission require NSP-MN's next capital structure filing to report on such financings and their impact on ratepayers.

I. ADDITIONAL PERMANENT REPORTING REQUIREMENTS

The Commission has required the following to be reported:

- A schedule showing, for various time periods, the planned investment for each project;
- A summary of NSP-MN's activity in the Utility Money Pool; and
- Regarding NSPMN's use of multi-year credit agreements a discussion detailing how often they are used, the amount involved, rates and financing costs, the intended users of the financing, and, for any period in which NSP-MN sells bonds, a comparison over a six-month period of the results of all bond issuances by other utilities.

NSP-MN provided all of this information in its petition; these items are discussed below.

To ensure appropriate oversight of NSP-MN's use of risk-management instruments, the Department also recommends that the Commission require all future NSP-MN capital-structure filings to include a summary of NSP-MN's use of risk-management instruments and the resulting effect on ratepayers.

III. MEETING SPECIFIC FILING REQUIREMENTS

A. REPORT ON USE OF MULTI-YEAR CREDIT

The Company provided information to comply with this requirement in its Attachment C. As shown in Attachment C, the Company did not borrow money from the credit facility over the period 2009-2018. The credit facility provides support for the Company's credit rating of A- and also provides the Company a liquidity insurance in periods of tight credit environments such as in 2008. Other advantages of the credit facility are provided in page 2 of the Company's Attachment C.

B. UTIILTY MONEY POOL ACTIVITY

The Company provided this information in its Attachment E. Page 4 of Attachment E summarized the Company's activities in the Money Pool over the period 2017-2018. The highest interest rate for borrowing was 1.97 on July 18. The lowest alternative interest rate was 4.25 percent. Thus, the Money Pool allows the Company to borrow short-term loans below the market rates. In the same period 2017-2018, the Company invested in the Money Pool at certain months. In each period, its interest rate from the Company's investment exceeded the alternative interest rates available to the Company. Therefore, the Department concludes that the Money Pool benefits the Company and its ratepayers.

C. SOURCES AND USES OF FUNDS (COMPANY'S ATTACHEMENT H) JULY-DEC. 2018

Over the period July-Dec 2018, the Company's only financial activity was equity infusion of $81,000,000.

Uses of Fund Jan – Dec 2019 estimated ($ millions)

Equity Infusion	$606,000
Long-Term Debt	$700,000
Total	$1,306,000
Uses	
Energy Supply	$1,233
Nuclear	$179
Distribution	$390
Transmission	$96
Other	$143
Total	$1,991
Short-term debt/ Internal Funds	$685

For 2017, the Company sources were ($ millions)

Long-Term Debt	$600
Equity Infusion	$198
Retirement/Reduction	($500)
Net Financing	$248
2017 Uses	
Energy supply	$126
Nuclear	$252
Distribution	$310
Transmission	
	$119
Other	$139
Total NSP-MN	$946
Short-term/Internal Funds	$698

Under the revised petition for the period Jan – Dec 2019, the equity infusion is increased by $767,000,000 to $848, 000,000 and the long-term issuances are increased from zero to $900,000,000. Also under uses in 2019, the energy supply is increased from $1,123 million to $1,883 million with no other changes. (Company Attachment H – revised).

The Company reported its sources and uses for 2017 on page two of its Attachment A.

D. CASH FLOW FOR THE PERIOD 2017-2019

The Company provided its cash flow statement in Attachment M of its original filing and in its revised Attachment M in its revised Petition.

E. PLANNED INVESTMENT

The Company's Attachment N provided this information for 2017, estimated and actual, for 2018 estimated and actual for the period ending August 31, 2018 and 2018 year-estimated and the variance between 2018 currently estimated versus 2018 previously estimated.

The Department concludes that for 2017 the discrepancy between the actual and projected investments (negative $17 million) is reasonable. For 2018, the difference between the projected investment and the actual investment for the period January 1, 2018 – August 31, 2018 plus the projected investment for the period September 1, 2018 – December 31, 2018 is $89 million. The differences between the 2018 investment as projected in 2017 and the currently projected investment for 2018 is $90 million and is the result of the fairly small deviations for each type of investment project with the largest difference of ($38) for energy supply. The Department concludes that these differences are reasonable given the need to forecast these investments a year ahead.

For the periods discussed above, the revised petition included the same investment level as the original Petition (Attachment N, and revised Attachment N, respectively). The Company also provided investment forecasts for the years 2019-2023 in Attachment N of its original Petition. In its revised Petition, the Company filed a revised Schedule N that assumes NSP-MN's acquisition of MEC I and MEC II. This change results in an increase of $850 million in the total energy supply in the year 2019.

Based on its review of NSP-MN Schedule N and revised Scheduled N, the Department concludes that the Company's filing meets the requirement that the Company's Capital Structure filing including actual investments for the year 2017, and projected planned investment for the years 2018 – 2023.

To ensure compliance with Order Points 1 and 2 of the Commission's July 9, 2004 Order in E,G002/AI-04-100, the Department recommends that the Commission require all future NSP-MN capital structure filings to include a comparison of the borrowing and lending interest rates from the Money Pool to alternative interest rates.

Last, to protect ratepayers, the Department recommends that all future NSP-MN capital-structure filings provide evidence to demonstrate that any bond issuances over the preceding year were cost competitive, including at a minimum a detailed comparative analysis to other bond issuances, such as that provided in NSP-MN's 2018 capital structure in the Department Attachment 3.

IV. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission:

- Approve NSP-MN's requested 2019 capital structure as filed in the original Petition (including total capitalization) effective until the Commission approves NSP-MN's 2019 capital structure;

- Allow NSP-MN to issue securities provided that the Company remains within the approved capital structure or does not go outside the approved capital structure for more than 60 days without the Commission's preapproval;

- Continue to allow NSP-MN to use risk-management instruments that qualify for hedge accounting treatment under Accounting Standard Codification No. 815;

- Continue to allow NSP-MN to treat borrowing under multi-year credit agreements as short-term debt, by varying Minn. Rules part 7825.10000, subpart 6;

- Allow NSP-MN to enter into financings to replace outstanding long-term debt instruments with less expensive securities, and tax-exempt financings for pollution-control construction programs, provided NSP-MN's next capital structure filing reports on any such financings entered into and their effect on ratepayers.

- Require NSP-MN to report the information described in section II.I (Additional Permanent Reporting Requirements) of these comments in all future capital-structure filings.

- Approve NSP-MN's 2019 revised Capital Structure subject to Commission approval of the Company's acquisition of MECI and MEC II in 2018 or 2019 and subject to NSP-MN acquiring MEC-I and MEC-II in 2019.

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Company Comp Set

Company Name	S&P Issuer Credit Rating Foreign Currency LT Rating	Debt Ratio	Equity Ratio	S.T.D Ratio
ALLETE, Inc. (NYSE:ALE)	BBB+	40.30%	57.9%	1.79%
Alliant Energy Corporation (NYSE:LNT)	A-	42.38%	44.2%	13.43%
Ameren Corporation (NYSE:AEE)	BBB+	44.52%	46.9%	8.61%
Avista Corporation (NYSE:AVA)	BBB	40.96%	47.6%	11.42%
CenterPoint Energy, Inc. (NYSE:CNP)	A-	60.58%	34.7%	4.77%
CMS Energy Corporation (NYSE:CMS)	BBB+	61.58%	30.0%	8.44%
Consolidated Edison, Inc. (NYSE:ED)	A-	46.00%	48.1%	5.85%
DTE Energy Company (NYSE:DTE)	BBB+	54.34%	42.4%	3.23%
Duke Energy Corporation (NYSE:DUK)	A-	50.98%	43.4%	5.62%
Evergy, Inc. (NYSE:EVRG)	A-	47.22%	49.0%	3.81%
Eversource Energy (NYSE:ES)	A+	48.07%	45.3%	6.68%
Northwestern Corporation (NYSE:NWE)	BBB	45.85%	46.0%	8.17%
OGE Energy Corp. (NYSE:OGE)	BBB+	39.17%	54.9%	5.96%
Public Service Enterprise Group Incorporated (NYSE:PEG)	BBB+	43.95%	50.4%	5.62%
Sempra Energy (NYSE:SRE)	BBB+	51.43%	39.2%	9.34%
Unitil Corporation (NYSE:UTL)	BBB+	48.18%	43.1%	8.72%
WEC Energy Group, Inc. (NYSE:WEC)	A-	42.62%	46.2%	11.15%
Xcel Energy Inc. (NasdaqGS:XEL)	A-	53.29%	42.0%	4.66%
Summary Statistics				
High	-	61.6%	57.9%	13.4%
Low-	-	39.2%	30.0%	1.8%
Mean	-	47.9%	45.1%	7.1%
Median	-	46.6%	45.6%	6.3%

Reporting Requirements for This Year's NSP-MN Capital Structure Filing

Source	Reporting Requirements
1-13-2003 Order in E,G002/S-02-1907	More specific explanations of the purpose for the security issuances than the explanation that funds will be used for "general corporate purposes."
	Address the appropriate cost of capital to apply to filings for the next 12 months.
5-12-2009 Order in E,G999/CI-08-1416	An exhibit providing a general projection of capital needs, projected expenditures, anticipated sources, and anticipated timing, with the understanding that, exhibit is not intended to require dollar-for-dollar on the uses identified in the exhibit or to limit issuances to project-specific financing. The exhibit need not short-term, recurring security issuances.
	Within 20 days of each non-recurring security issuance, an after-the-fact report, filed for information purposes only, providing the following information: 1) Type of security issued; 2) the total amount issued; 3) the purpose of the issuance; 4) the issuance of cost associated with het security issuance; and 5) the total cost of the security issuance, including details such as interest rate or cost per share of common equity issued.
6-3-2014 Order in E002/M-00-1553	Provided Xcel Energy has not made any EWC (exempt wholesale generator) and/or FUCO (foreign utility company) investments, the Company may simply notify, in its annual capital structure filing, that it does not have any EWG and/or FUCO investments. If it does have ECW and/or FUCO investments, then it must continue to provide the previously required information.
3-21-2017 Order in E,G002/S-16-887 (Req. Not Permanent	A schedule showing, for various time periods, the planned investment for each project.
	A report on NSP0MN's use of multi-year credit agreements, including how often they are used, the amount involved, rates and financing cost, the intended use of the financing, and, for any period in which Xcel sells bonds, a comparison over a six-month period of the results of all bond issuances by other utilities.
Minn. Rules 7825.1300	A cash-flow statement by month showing the most recent available 21 months actual data and forecasted data to the end of the period encompassed by the petition, filed on forms prescribed by the commission, with a descriptive summary of the assumptions made in the developments in the cash-flow statement (this requirement only applies to petitions to issue short-term securities)
Minn. Rules 7825.1400	A. A descriptive title.
	B. A table of contents.
	C. The exact name of the petitioner and address of its principal business office.
	D. Name, address, and telephone number of the person authorized to receive notices and communications with respect to the petition.
	E A verified statement by a reasonable officer of the petitioner attesting to the accuracy and completeness of the enclosed information.
	F. The purpose for which the securities are to be issued.
	G. Copies of resolutions by the directors authorizing the petition for the issue or assumption of liability in respect to which the petition is made; and if approval of stockholders has been obtained, copies of the stockholders shall be furnished.
	H. A statement as to whether, at the time of filing of the petition, the petitioner knows of any person who is an "affiliated interest" within the meaning of Minnesota Statutes, section 216B.48, subdivision 1, who has received or is entitled to receive a fee for services in connection with the negotiations or consummation of the issuance of the securities, or for services in securing underwriters, or purchases of the securities.
	I. A signed copy of the opinion of counsel in respect to the legality of the issuance or assumption of liability.
	J. A balance sheet dated no earlier than six months prior to the date of the petition together with an income statement and statement of changes in financial position covering the 12 months then ended. When the petitions include long-term securities, such statements shall show the effects of the issuance on the balance sheet and income statement.
	K. A description of the security or securities to be issued.
	L. An estimate of the interest of the interest or dividend cost per $100 principal amount, except in the case of common stock, and a description of any anticipated terms or indenture provisions.
	M. If the petition is a corporation, a copy of its current articles of incorporation certified by the secretary of state of incorporation. If the current articles have already been filed, the petitioner need only make specific reference to such filings.
	N (1) The amount and kinds of stock authorized by articles of incorporation and amount outstanding.
	N.(2) The terms of preference of preferred stock, whether cumulative or participating, or on dividends or assets, or otherwise.
	N (3) A brief description of each security agreement, mortgage, and deed of trust upon petitioner's property, showing date of execution, debtor, and secured, together with any sinking fund provision.

	N (4) The amount of bonds authorized and issued that exceed one percent of total debt giving the name of the public utility which issued same describing class separately, and giving the date of issue, par value rate of interest, date of maturity, and how secured, together with the amount of interest paid thereon during the last fiscal year. N (5) Each note outstanding with a maturity of more than one year and which exceeds one percent of total debt, giving the date of issue, the amount, the date of maturity, the rate of interest, in whose favor, together with the amount of interest paid thereon during the last fiscal year. N (6) Other indebtedness with a maturity of more than one year, by class, together with the amount of interest paid thereon during the last fiscal year.
	N (7) The rate and amount of dividends paid during the five previous fiscal years.
	O. A statement of the manner in which such securities will be issued; and if invitations for sealed written proposals (competitive bidding) are not anticipated, explanation of the decision not to invite such proposals shall be submitted.
	P. A copy of each plan, offer, or agreement for the reorganization or readjustment of indebtedness or capitalization or for the retirement or exchange of securities.
	R. Such additional information that the staff or commission may require in a particular case.
	S. If a filing requirement does not apply, it shall be so stated with an explanation why it does not apply.
Minn. Rules 7825.1500	A. A copy of the final registration statement, if any, and financial exhibits made a part therefore, filed with the Securities and Exchange Commission in accordance with the Securities Act of 1933.
	8. If an invitation for sealed written public proposals for the purchase or underwriting of such securities has been made, a summary of the terms of the proposals received including the name of each bidder or representative of a bidding group, the interest or dividend rate specified, where applicable, the price to be paid to the issuer per unit or $100 principal amount, the cost of money to the issuer, except in the case of common stock, the name of the successful bid, and the successful bidder's initial public offering price and the resulting yield to the public, except in the case of common stock.

CERTIFICATE OF SERVICE

I, Marcella Emeott, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, 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/S-18-654**

Dated this **24th** day of **December 2018.**

/s/Marcella Emeott

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