414 Nicollet Mall
Minneapolis, MN 55401

**PUBLIC DOCUMENT –
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March 29, 2021

**—Via Electronic Filing—**

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: REPLY COMMENTS
2020 ANNUAL REVIEW OF REMAINING LIVES & FIVE-YEAR DEPRECIATION STUDY
DOCKET NO. E,G002/D-19-723

Dear Mr. Seuffert:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments regarding our 2020 Review of Remaining Lives and Five-Year Depreciation Study Petition. This filing is submitted in response to Comments received by the Department of Commerce, Division of Energy Resources and Office of the Attorney General on February 16, 2021.

Portions of the enclosed Petition are marked "NOT-PUBLIC" as they contain information the Company considers to be trade secret data as defined by Minn. Stat. §13.37(1)(b). This data includes confidential pricing and other contract terms. The information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use.

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 laurie.j.wold@xcelenergy.com or (612) 330-5510 if you have any questions regarding this filing.

Sincerely,

/s/

LAURIE J. WOLD
SENIOR MANAGER, CAPITAL ASSET ACCOUNTING

Enclosure
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

| | |
|---|---|
| Katie J. Sieben | Chair |
| Valerie Means | Commissioner |
| Matthew Schuerger | Commissioner |
| Joseph K. Sullivan | Commissioner |
| John A. Tuma | Commissioner |

| | |
|---|---|
| IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF THE 2020 REVIEW OF REMAINING LIVES AND FIVE-YEAR DEPRECIATION STUDY | DOCKET NO. E,G002/D-19-723<br><br>**REPLY COMMENTS** |

## OVERVIEW

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Reply Comments regarding our 2020 Review of Remaining Lives and Five-Year Depreciation Study Petition. This filing is submitted in response to Comments received by the Department of Commerce, Division of Energy Resources, (Department) and Office of the Attorney General, Utilities and Antitrust Division, (OAG) on February 16, 2021.

The Company appreciates the thorough review by all parties and the recommended approval of the vast majority of the Petition. Below, we respond to several items raised in comments.

## A. 2019 Capital True-Up Report

The Department asked we provide an explanation of, and calculations showing, how the Company incorporated the decrease in 2019 production depreciation expense into its 2019 Capital True-Up Report calculation.

The Commission's October 22, 2019 Order approved the remaining lives and net salvage percent from the Company's 2019 Review of Remaining Lives (Docket No. E,G002/D-19-161), retroactively effective to January 1, 2019. The Company input the new remaining lives and net salvage in August 2019 with a recalculation back to

January. These new parameters were used to calculate depreciation expense for the remainder of 2019.

2019 year-end actuals were used to report in the 2019 Capital True-Up so the decrease to depreciation expense resulting from the 2019 Review of Remaining Lives was incorporated, even though it was not specifically called out in the narrative of the true-up compliance report.

Table 1 below shows actual depreciation expense recorded for the Electric Other Production functional class. In the 2019 Remaining Lives docket, the only approved changes came from the Other Production functional class for certain life extensions. Therefore, there is a notable decrease in expense in August 2019 (the month the Commission approved the docket) when new lives were input with a true-up back to January. This table is shown at NSPM Total Company and excludes the depreciation expense on asset retirement cost assets as those are excluded from ratemaking. The increase to December's depreciation expense was due to the in-servicing of two wind farms in November and December 2019.

**Table 1**
**2019 Actual Electric Other Production Depreciation Expense by Month**

| | |
|---|---|
| January | 9,443,534 |
| February | 9,453,785 |
| March | 9,468,536 |
| April | 9,457,564 |
| May | 9,535,780 |
| June | 9,635,271 |
| July | 9,492,027 |
| August | 5,854,024 |
| September | 9,075,664 |
| October | 9,078,949 |
| November | 9,371,345 |
| December | 10,110,341 |
| **Total** | **109,976,821** |

In the 2019 Capital True-Up Compliance Report, it was noted the actual 2019 revenue requirements were $49.6 million higher than the approved rate case, primarily driven by higher rate base and depreciation expense partially offset by lower capital additions.

As such, no refund to customers was required. The decrease to Other Production depreciation expense in the 2019 Remaining Lives docket was estimated at $5.2 million. Therefore, even if the decrease had not been included it would not have put the Company into a refund position on the 2019 Capital True-Up.

The Department also requested the Company to "provide additional explanation if 2019 actual depreciation expense differed from approved rates by more than $1 million". Due to the use of the remaining life methodology, the Company follows a formula to calculate depreciation expense rather than a rate. Therefore, there are no "approved rates" to compare to. The 2019 Remaining Lives Petition estimated what the change to annual depreciation would be at a point in time (January 1, 2019) and does not account for any change in expense due to transactional change in the accounts during the year. As shown on the Company's Attachment C to our initial petition in this instant proceeding, in 2019 the Other Production function had $427 million in plant additions and $15 million in plant retirements which would cause actual depreciation expense to vary compared to the point in time reference from the 2019 Remaining Lives docket.

## B. Wind2Battery

Below the Company provides additional information related to the Wind2Battery project, as requested by the Department. As an initial point, the Company notes the purpose of this remaining lives petition is to determine the correct remaining lives and salvage amounts for accounting purposes to set depreciation parameters. While we do not object to providing this information, we note that the instant docket is not necessarily the best place to assess the prudence of the Company's actions and investments related to this project.[1] That is, the Company acknowledges parties may wish to review this information in a rate case proceeding, when cost recovery is being assessed.

[1] While the implementation of the capital true-up does create the potential for true-ups related to changes in our overall capital recovery, we note any changes related to assumptions around the Wind2Battery project will not be sufficient to trigger a refund.

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**NOT PUBLIC DATA HAS BEEN EXCISED**

*1. General Comments*

Our Wind2Battery project marked the first use of direct wind energy storage technology in the United States. Through this small-scale demonstration project, we were able to evaluate energy storage technology at a modest level of investment and customer impact. By doing so, the Company will promote the future deployment of only proven technologies that meet or exceed cost, reliability, and environmental requirements.

The Company, the utility industry, the wind energy industry, and the energy storage industry (nationally and internationally) have all benefited from the information gained from this project. If we are to help the State of Minnesota reach its goals on climate change, battery technology is crucial, and the information gleaned from this pilot is pivotal in informing future research and implementation of battery storage. Due to the numerous benefits provided by this battery pilot, and its relatively small scope, the Company believes the reserve reallocation we have proposed at this time is reasonable and in the public interest. That said, the Company will continue to work to ensure actual removal costs are as low as possible. Should such costs ultimately be less than the current $5.6 million estimate, the Company would propose a reserve reallocation back to other remaining plants.

On page 16 of the OAG's Comments, they state,

> *"Xcel proposes a negative 135.6% net salvage rate for W2B, which is by far the highest salvage rate percentage proposal in the Petition. Excluding the proposed net salvage rates for the three accounts at each the Maplewood and Sibley gas production facilities, the Petition's closest net salvage percentage to W2B is the proposed negative 30.6% net salvage rate for the majority of the accounts associated with the Blue Lakes production units. In comparison to the Company's other net salvage rates, Xcel's proposal relating to W2B strikes the OAG as excessive."*

The Company notes that the OAG's comparison excludes other plants which also have a high negative net salvage rate, making the battery's costs look abnormal. A full review of the record shows this is not the case. For example, in Docket E,G002/D-12-151, a reserve reallocation was ordered in relation to the Minnesota Valley plant which equated to a net salvage over negative 100 percent. Similarly, in Docket E,G002/D-19-161, the approved net salvage percent was negative 93.7 percent for the Maplewood Gas Productions facility and negative 79.5 percent for Sibley Gas Production.

Furthermore, there is a certain amount of fixed costs typically associated with removal projects that make large projects gain economies of scale when compared to smaller projects. Looking at removal costs as a percentage of plant in a vacuum without the context of the absolute dollars associated with those values is an imperfect metric. $5 million of removal costs on a $10 million asset creates a negative 50 percent net salvage rate while $50 million of removal costs on a $300 million asset is less than 17 percent, even though absolute dollars are ten times higher than the smaller project.

When comparing the three largest facilities (as determined by gross plant balance) in operation to the three smallest, the smaller projects have a far larger net salvage percent but are vastly less expensive in real dollars.

**Table 2**
**Dismantling and Net Salvage Comparisons**

| Plant | Plant Balance 1/1/2020 | Dismantling Estimate | Net Salvage Percent |
|---|---|---|---|
| Sherco Unit 3 | $756M | $109M | -15.1% |
| Sherco Units 1&2 | $721M | $59M | -7.9% |
| King | $713M | $66M | -9.2% |
| | | | |
| Maplewood | $6M | $5M | -87.7% |
| Upper Dam | $5M | $1.2M | -26.7% |
| St. Croix Falls | $2M | $0.3M | -15.0% |

Simply put, just because a project has a high negative net salvage percent does not automatically mean the costs are "excessive".

*2. Rate Case Recovery*

The Department asks that the Company provide reference cites to the Company's initial rate case Direct Testimony requesting cost recovery for its Wind2Battery system of a total $4.1 million, and the subsequent Ordering Point(s) that allowed such recovery.

The Company rolled the Wind2Battery system into base rates from the Renewable Energy Standard (RES) rider as part of our rate case filing in Docket No. E002/GR-

10-971. Prior to the rate case filing, the Commission limited the Company's cost recovery through the RES rider but authorized the Company to seek recovery of additional costs in its next rate case. Therefore, as part of the aforementioned proceeding the Company requested an additional $202,473 in recovery as part of Graika Direct Testimony Exhibit___(PKG-1). This additional recovery accounted for the Company's obligations to fund our original Wind2Battery research partners. As stated in (PKG-1):

> *The project was approved for a $1 million RDF grant. The RDF payment will be distributed $797,527 to capital project costs and $202,473 to fund research costs by project partners. Project partners, including NREL, the University of Minnesota, and Great Plains Institute are also contributing toward the project research, at an estimated value of $368,322. . . . Thus, of the $1,000,000 Renewable Development Fund ("RDF") grant received by the Company, $202,473 was paid to our project partners and was not an offset to the overall cost of the project. Recovery is appropriate as the payments to our project partners was a necessary part of the project and provided net benefits to the value of the project.*

Additionally, Ms. Graika's Direct Testimony noted that the gross investment in the Wind2Battery facility of $4.2 million was approved by the Commission in their June 16, 2010 Order regarding the Company's 2010 Review of Remaining Lives docket (Docket No. E,G002/D-10-173).

Finally, as part of the Department's review of Company's 2010 rate case, Department witness Ms. Nancy A. Campbell noted in her April 5, 2011 direct testimony:

> *Based on my review of amounts that exceed the certificate of need amounts for Nobles and Wind2Battery in this rate case, I am only making adjustments for Nobles at this time.*

Based on the preceding information and resolution of Docket Nos. E002/GR-10-971 and E,G002/D-10-173, the Wind2Battery gross investment of $4.2 million and additional recovery of $202,473 for project partners were not explicitly identified in a rate case order, but they were included in the calculation of final rates and depreciation filings approved by the Commission.

*3. Contract Operating Term and Cancelation Clauses*

The Department asked the Company to provide the initial contract operating term with Minwind Energy for the Wind2Battery system. If the term was different from the 15-year useful life of the battery, the Company should explain why. And

additionally, to explain whether a cancelation clause existed in the contract in order to protect against early obsolescence of the pilot program, and if not, why not.

The Company's contract with Minwind was written to last for the life of the wind Purchase Power Agreement (PPA). The PPA was entered into for a term "until the end of the 20th year after the Commercial Operation Date". The Commercial Operation Date was achieved on February 2, 2005 and therefore the PPA should have been in effect until February 1, 2025. However, Minwind entered bankruptcy in 2015 and in 2019 defaulted on the associated PPA. Termination clauses existed contractually[2] for Minwind but were not tied to early obsolescence of the battery. The Company performed due diligence by including cancellation clauses in the contracts.

When it was determined the PPA was breached, the Company evaluated what remedies were available. At this time, the Company has determined that a claim for breach would be unlikely to result in damages, and that it ultimately is less expensive for the Company to purchase renewable energy certificates and replacement energy in the market using locational marginal pricing versus the rate on the PPA.

*4. Dismantling Estimate*

The Department requests that Xcel explain in its reply comments why it appears that the Company did not file any discussion regarding the potential for removal costs for the Wind2Battery System between initial representations from the manufacturer in 2011 and the sale of the Minwind Energy wind farm in 2019.

In the Company's 2008 Contract Agreement and Purchase Order with NGK Insulators, Ltd. (NGK), the battery manufacturer, there was a clause for the end of life disposal which stated, "Upon notification from [NSP-Minnesota] that the goods and/or services have reached end of life, [NGK] agrees to dispose of the goods and/or services. Supplier shall invoice company for the fees related to such disposal, at its cost, which may be verify [sic] by Company at Company's discretion."

When this project was being selected, the Company worked with NGK to understand what disposal options could look like at the end of life. A comprehensive report on

[2] The Company notes the cancellation clause is Item 10 within the Minwind access agreement which was provided as Attachment A to Data Request OAG-006 in this docket filed October 7, 2020.

the battery project was issued as part of the Renewable Development Fund in December 2011.[3] The report stated, **[PROTECTED DATA BEGINS** [redacted] **PROTECTED DATA ENDS]**

A zero percent net salvage rate was initially applied as we believed it was a conservative approach to the uncertainty represented in dismantling this new type of asset. Due to the representations received from the manufacturer stating the battery was mostly recyclable, the highly specialized nature of this battery, as well as the relatively minimal investment, as compared to other investments in production plants, the Company believed the net dismantling costs for the battery asset would be minimal. Battery technology has evolved rapidly in the decade since the asset was placed in service and the industry anticipated that recycling options would keep pace with new innovations.

At the time of the 2015 Dismantling Study, the battery was operating as intended and the Company did not have any indications that the information provided by the manufacturer was out of alignment with future disposal options. Again, due to the specialized nature of the battery, the manufacturer representations, and the low capital cost as compared to other Production assets, the asset was not included in the 2015 Dismantling Study. The battery also was excluded from the 2020 Dismantling Study as we were specifically exploring recycling options with partners who would have more experience for this particular type of asset than TLG Services, Inc.

For any production plants as we get closer to dismantling, the Company will utilize specific project estimates rather than the dismantling studies. NGK and S&C Electric Company (NGK's representative in the United States) have been in contact with numerous battery recycling partners to find a company who would be willing and able to dispose of this battery. Thus far, all companies contacted have declined, stating the industry does not currently have a solution for disposing these types of batteries in North America. The Company based the dismantling estimate on information provided by S&C estimating the removal costs if they were able to find a recycling

[3] This Report was included as Attachment B to the Company's 2011 Renewable Energy Standard Rider & 2010 RES Tracker Report Petition filed on October 5, 2010 in Docket No. E002/M-10-1066.

partner willing to accept the battery. The Company has been reaching out to NGK to continue pursuing disposal options.

The Department also asks whether any funding is available to offset any of the dismantling costs, including environmental remediation grants or insurance proceeds. The Company is not aware of any such offsets. As discussed above, at the outset of this project, we understood from the market and from our partners that this battery would either be recycled at negligible costs or may even have salvage value to be reused at the end of its life. As technology in the battery landscape is rapidly evolving, circumstances have changed, and the situation has us and other companies who have implemented this technology struggling to find adequate disposal channels.

*5. Research Information*

Finally, the Department asks the Company to explain its plan to file information from the results of the research project and credit to ratepayers any and all revenues and any other income due to the research project, including which docket(s) it will be filed in and on what timeline. Alternatively, if we already filed this information, the Department asks that our explanation include specific cites to docket numbers and filing dates.

Beginning in 2010, the Company provided updates on the Wind2Battery project annually as part of our Smart Grid Report (Docket No. E002/M-08-948) with the final update being on April 1, 2014 as that was the final annual Smart Grid Report.

Additionally, on October 5, 2010 the Company provided our Data Collection and Analysis Report as Attachment B to the Company's 2011 Renewable Energy Standard Rider and 2010 RES Tracker Report.[4] No credits to ratepayers were paid or are due, as no income was received as part of this research project.

## C. 2020 and 2021 Wind In-Service Update

In our initial petition filed on August 18, 2020, there were several wind facilities under construction or in the process of being acquired. The table below outlines the actual

[4] Note – this filing was later submitted in Docket No. E002/AI-09-379 on January 10, 2012. It was originally intended to be filed in this docket in October of 2010 but was not due to an oversight.

in-service date (ISD) for those facilities which have been acquired or have come online and the current forecast ISD for the plants still under construction.

**Table 3**
**Actual and Forecast Wind Project ISDs**

| Facility | Actual ISD | Forecast ISD |
|---|---|---|
| Crowned Ridge | December 2020 | |
| Community Wind North | December 2020 | |
| Jeffers | December 2020 | |
| Blazing Star 2 | January 2021 | |
| Mower | March 2021 | |
| Freeborn | | April 2021 |
| Dakota Range | | December 2021 |

Pursuant to Docket No. E002/M-18-777, the Community Wind North and Jeffers Wind projects were acquired in December 2020. Capital plant and acquisition costs recorded were **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** for Community Wind North and **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** for Jeffers. The final entries for these transactions were detailed in the February 26, 2021 filing within the aforementioned docket. Total estimated 2021 depreciation and amortization expense is $2.7 million for Community Wind North and $2.9 million for Jeffers using net salvage of negative 10.5 percent and a 25-year life.

The Commission approved the Mower Wind acquisition on November 5, 2020 in Docket No. E002/PA-19-553. The order approved cost recover through the renewable energy standard rider (RES rider) as well as approve to recover the acquisition adjustment. The capital plant and acquisition costs are estimated to be **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** with a closing date in March 2021. Total estimated 2021 depreciation and amortization expense is **[PROTECTED DATA BEGINS PROTECTED DATA ENDS]** using net salvage of negative 10.5 percent and a 25-year life. Final accounting entries are due within 60 days of completing the transaction.

## D. Removal Cost Update

We are pleased to report on the current status of the removal of several retired plants, as requested by the Department. In the Company's COVID Relief and Recovery proposal (Docket No. E,G999/CI-20-492), we proposed accelerated removal of assets at a number of our generating plants, which will assist us in utilizing existing distribution and transmission infrastructure designed around those sites, and eliminate potential pollutants from the community. The Company provides a discussion of several of these projects in addition to the Department's request to update the status of Minnesota Valley and Black Dog.

### *1. Minnesota Valley*

The Minnesota Valley demolition project continues to move ahead. In March 2021, the Company retained an external engineering consultant to conduct a pre-demolition regulated materials building survey and prepare drawings and technical specifications for inclusion in the demolition bid package. Abatement of regulated wastes is expected to begin in the second half of 2021 with completion date dependent on the required scope and magnitude of the effort identified by the building survey. Structural demolition and site restoration are still scheduled to take place in 2022. Project contingencies were reduced by $3 million in January 2021 to reflect a rebound in scrap pricing and increased confidence in both internal and external cost estimates.

**Table 4**
**Minnesota Valley Dismantling Estimate**

| (in millions) | Initial estimate | Updated estimate |
|---|---|---|
| 2020 actual | $0.10 | $0.01 |
| 2021 forecast | 2.60 | 0.41 |
| 2022 forecast | 7.80 | 8.36 |
| 2023 forecast | 0.10 | 0.00 |
| Total | $10.60 | $8.78 |

### *2. Black Dog*

The Unit 3 turbine, the boiler for Units 2 and 3, and related plant equipment were planned for removal in 2021-2025. Since filing our initial petition, removal work at the Black Dog site has been further evaluated. Unlike Minnesota Valley, there is a

portion of the Black Dog Steam facility that is necessary for the continued operation of Units 5 and 6. The Company determined there are economies of scale if the removal of the Unit 2 and 3 boilers occur simultaneously with the full dismantling of the site after Unit 5 and 6 shutdown which is intended to make the total removal of the Black Dog site less expensive for customers in the long run rather than performing targeted removal in the near term without disrupting current operations. Therefore, the updated estimate represents $1 million of costs in 2021 for asbestos removal from the Unit 3 boiler along with small trailing project close out work in 2021-2023.

**Table 5**
**Black Dog Dismantling Estimate**

| (in millions) | Initial estimate | Updated estimate |
|---|---|---|
| 2020 actual | $2.70 | $3.55 |
| 2021 | 6.80 | 1.49 |
| 2022 | 4.40 | 0.18 |
| 2023 | 4.50 | 0.24 |
| 2024 | 4.80 | 0.00 |
| 2025 | 4.40 | 0.00 |
| Total | $30.60 | $5.46 |

*3. Key City and Granite City*

As of the initial filing date of this petition, the Company was not far enough along in the process of plant demolition to have detailed estimates for Key City or Granite City. These plants were included in the Accelerated Asset Removal within the COVID Relief and Recovery docket. Through the net salvage percent over the life of these plants, the Company has removal reserves of $4.4 million for Granite City and $4.1 million for Key City. These were based on the 5-year dismantling studies performed at a high level by TLG Services, Inc.

In the second half of 2020, the Company worked diligently to scope these projects and get competitive bids. In Q1 2021, the Company received bids and currently anticipate the removal costs to be $0.75 million per facility.

*4. Overall discussion of removal*

The 5-year dismantling studies are meant to ascertain a reasonable level of recovery for removal costs over the operating life of the asset, which can be over many decades. It is not meant to be a definitive calculation of costs at a very detailed level nor is it a comprehensive project management guide.

When a plant is reaching the final years of operations, preparations begin to determine the full timing and scope of the removal project, including which structures will be retained and which removed, what environmental impacts the site has, what the future development of the site may be, what work will be performed with internal versus external labor, and finally, going out to bid on externally performed functions.

Some of these factors may not be known until after shutdown, at which point, recovery of the costs through depreciation rates is no longer an option which is where reserve reallocations perform a necessary function. Some plants may be under-recovered compared to the decades-long estimate and some may have excess funds. For example, although our current removal cost estimates suggest our reserve allocation for the Wind2Battery asset was too low, our allocation for Key City and Granite City, on the other hand was notably higher than apparently needed based on bids we received.

In our initial petition on Page 18, the Company stated in regards to Key City and Granite city, "At final removal of the plant assets, if there is reserve in excess of the plant balance, we plan to transfer this reserve to the remaining production accounts." The Company is consistent in the treatment of requesting a reserve reallocation when under collected but also giving customers the benefit of reallocating contributions when projects come in under their estimate in order to smooth depreciation expense and rate impacts across generations.

## E. Future Reporting

*1. Background*

At the Commission's March 18, 2021 Agenda Meeting, the Commission asked why the Company's two annual review of remaining lives filings: 1) Production and 2) Transmission, Distribution, and General Depreciation (TD&G) are filed separately. As explained at the Agenda Meeting, the Production filing has always been an annual filing as it has always used an average remaining life which requires an annual filing

per Minn. R. 7825.0600. The TD&G assets previously used an average service life, which required a Petition for Depreciation Certification every five years per Minn. R. 7825.0700. In our 2017 TD&G Petition,[5] the Company requested to change from the average service life methodology to the annual remaining life methodology, requiring an annual filing. The Commission approved this request in their May 4, 2018 Order, requiring the first annual remaining lives filing for TD&G be submitted July 31, 2018, with the next five-year depreciation study due July 31, 2022.

The Company's next TD&G annual remaining lives filing is due July 31, 2021. The Company's next Production annual remaining lives filing's due date is yet to be determined as the 2020 Petition is still pending[6] due to an adjusted timeline to better align with the Commission's Inquiry into the Financial Effect of COVID-19 on Natural Gas and Electric Utilities.[7] The previous timeline had been to file the Production annual remaining lives filing annually in February. We believe it would be in the best interest of all parties to move towards combining these filings into one submission to lessen the administrative burden of processing two separate filings each year. We propose to keep the filings separate for 2021 (forward-looking with an effective date of January 1, 2022), but do combined reporting starting in July 2022 (forward-looking with an effective date of January 1, 2023).

## CONCLUSION

Xcel Energy continues to recommend the Commission approve our Petition as filed.

Dated: March 29, 2021

Northern States Power Company

[5] Docket No. E,G002/D-17-581, IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR CERTIFICATION OF ITS FIVE-YEAR TRANSMISSION, DISTRIBUTION, AND GENERAL DEPRECIATION STUDY, July 31, 2017.
[6] See Docket No. E,G002/D-19-723.
[7] See Docket No. E,G999/CI-20-425

## CERTIFICATE OF SERVICE

I, Crystal Syvertsen, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

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

xx electronic filing

**DOCKET NO. E,G002/D-19-723**

Dated this 29th day of March 2021

/s/

_____

Crystal Syvertsen
Regulatory Administrator

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
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| George | Crocker | gwillc@nawo.org | North American Water Office | PO Box 174<br>Lake Elmo,<br>MN<br>55042 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
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| Janet | Gonzalez | Janet.gonzalez@state.mn.us | Public Utilities Commission | Suite 350<br>121 7th Place East<br>St. Paul,<br>MN<br>55101 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Todd J. | Guerrero | todd.guerrero@kutakrock.com | Kutak Rock LLP | Suite 1750<br>220 South Sixth Street<br>Minneapolis,<br>MN<br>554021425 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Matthew B | Harris | matt.b.harris@xcelenergy.com | XCEL ENERGY | 401 Nicollet Mall FL 8<br>Minneapolis,<br>MN<br>55401 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Annete | Henkel | mui@mnutilityinvestors.org | Minnesota Utility Investors | 413 Wacouta Street<br>#230<br>St.Paul,<br>MN<br>55101 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Michael | Hoppe | lu23@ibew23.org | Local Union 23, I.B.E.W. | 445 Etna Street<br>Ste. 61<br>St. Paul,<br>MN<br>55106 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Alan | Jenkins | aj@jenkinsatlaw.com | Jenkins at Law | 2950 Yellowtail Ave.<br>Marathon,<br>FL<br>33050 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Richard | Johnson | Rick.Johnson@lawmoss.com | Moss & Barnett | 150 S. 5th Street<br>Suite 1200<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Sarah | Johnson Phillips | sarah.phillips@stoel.com | Stoel Rives LLP | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Mark J. | Kaufman | mkaufman@ibewlocal949.org | IBEW Local Union 949 | 12908 Nicollet Avenue South<br>Burnsville,<br>MN<br>55337 | Electronic Service | No | OFF_SL_19-723_D-19-723 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Thomas | Koehler | TGK@IBEW160.org | Local Union #160, IBEW | 2909 Anthony Ln<br>St Anthony Village, MN 55418-3238 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Douglas | Larson | dlarson@dakotaelectric.com | Dakota Electric Association | 4300 220th St W<br>Farmington, MN 55024 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Peder | Larson | plarson@larkinhoffman.com | Larkin Hoffman Daly & Lindgren, Ltd. | 8300 Norman Center Drive<br>Suite 1000<br>Bloomington, MN 55437 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Eric | Lipman | eric.lipman@state.mn.us | Office of Administrative Hearings | PO Box 64620<br>St. Paul, MN 551640620 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Ryan | Long | ryan.j.long@xcelenergy.com | Xcel Energy | 414 Nicollet Mall<br>401 8th Floor<br>Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Kavita | Maini | kmaini@wi.rr.com | KM Energy Consulting, LLC | 961 N Lost Woods Rd<br>Oconomowoc, WI 53066 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E<br>St. Paul, MN 55106 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Joseph | Meyer | joseph.meyer@ag.state.mn.us | Office of the Attorney General-RUD | Bremer Tower, Suite 1400<br>445 Minnesota Street<br>St Paul, MN 55101-2131 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Stacy | Miller | stacy.miller@minneapolismn.gov | City of Minneapolis | 350 S. 5th Street<br>Room M 301<br>Minneapolis, MN 55415 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St<br>Duluth, MN 558022093 | Electronic Service | No | OFF_SL_19-723_D-19-723 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| David | Niles | david.niles@avantenergy.com | Minnesota Municipal Power Agency | 220 South Sixth Street<br>Suite 1300<br>Minneapolis,<br>Minnesota<br>55402 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Carol A. | Overland | overland@legalectric.org | Legalectric - Overland Law Office | 1110 West Avenue<br>Red Wing,<br>MN<br>55066 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131 | Electronic Service | Yes | OFF_SL_19-723_D-19-723 |
| Kevin | Reuther | kreuther@mncenter.org | MN Center for Environmental Advocacy | 26 E Exchange St, Ste 206<br>St. Paul,<br>MN<br>551011667 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Richard | Savelkoul | rsavelkoul@martinsquires.com | Martin & Squires, P.A. | 332 Minnesota Street Ste W2750<br>St. Paul,<br>MN<br>55101 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Will | Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7th Pl E Ste 350<br>Saint Paul,<br>MN<br>55101 | Electronic Service | Yes | OFF_SL_19-723_D-19-723 |
| Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | 76 W Kellogg Blvd<br>St. Paul,<br>MN<br>55102 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Byron E. | Starns | byron.starns@stinson.com | STINSON LLP | 50 S 6th St Ste 2600<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| James M | Strommen | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered | 150 S 5th St Ste 700<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_19-723_D-19-723 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|---|---|---|---|---|---|---|---|
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500<br>Capella Tower<br>Minneapolis,<br>MN<br>554024629 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Lynnette | Sweet | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7<br><br>Minneapolis,<br>MN<br>554011993 | Electronic Service | Yes | OFF_SL_19-723_D-19-723 |
| Thomas | Tynes | jjazynka@energyfreedomcoalition.com | Energy Freedom Coalition of America | 101 Constitution Ave NW Ste 525 East<br><br>Washington,<br>DC<br>20001 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Lisa | Veith | lisa.veith@ci.stpaul.mn.us | City of St. Paul | 400 City Hall and Courthouse<br>15 West Kellogg Blvd.<br>St. Paul,<br>MN<br>55102 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Samantha | Williams | swilliams@nrdc.org | Natural Resources Defense Council | 20 N. Wacker Drive<br>Ste 1600<br>Chicago,<br>IL<br>60606 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Joseph | Windler | jwindler@winthrop.com | Winthrop & Weinstine | 225 South Sixth Street, Suite 3500<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_19-723_D-19-723 |
| Patrick | Zomer | Pat.Zomer@lawmoss.com | Moss & Barnett a Professional Association | 150 S. 5th Street, #1200<br><br>Minneapolis,<br>MN<br>55402 | Electronic Service | No | OFF_SL_19-723_D-19-723 |