414 Nicollet Mall
Minneapolis, Minnesota 55401

October 31, 2008

—ELECTRONIC FILING—

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

Re: PETITION FOR APPROVAL OF CHANGES IN CONTRACT DEMAND ENTITLEMENTS
DOCKET NO. G002/M-08-_______

Dear Dr. Haar:

Enclosed is the public Petition for Approval of Changes in Contract Demand Entitlements of Northern States Power Company, a Minnesota corporation ("Xcel Energy or the "Company"), for approval of a change in Contract Demand Entitlements pursuant to Minn. Rule 7825.2910, Subd. 2. Copies of the non-public version are being provided separately.

Portions of our filing contain trade secret information as defined under Minn. Stat. § 13.37. As such, this data is protected from public disclosure and has been marked accordingly. Xcel Energy makes extensive efforts to maintain the secrecy of this information. This information is not available outside the Company except to other parties involved in contracts and to regulatory agencies under the confidentiality provisions of state or federal law, as evidenced by the non-disclosure provisions in the contracts. Xcel Energy also provides this information to state regulatory agencies in the Annual Automatic Adjustment of Charges Reports and in the monthly purchased gas adjustment ("PGA") filings in the confidential trade secret versions of these reports.

The supply information has economic value to Xcel Energy, its customers, suppliers, and competitors in at least three ways. If suppliers know the terms of Xcel Energy's supply and transportation contracts, they may be able to use this knowledge to fashion bids to Xcel Energy. Suppliers will be reluctant to offer special favorable terms to Xcel Energy if they know other competitors or customers will gain knowledge of the terms and demand similar terms in the future. Competitors of Xcel Energy such as other LDCs also purchase their services. These competitors may be able to leverage knowledge of Xcel Energy's costs to gain similar terms or may offer slightly better prices to suppliers, denying Xcel Energy's access to this gas or other services.

Any of these results would harm Xcel Energy and it's natural gas customers. Because Xcel Energy competes for supplies, transportation, storage, and other services in the wholesale market, disclosure would directly harm Xcel Energy by making its delivered supply cost less competitive. To the extent that Xcel Energy supply costs rise, Xcel Energy's regulated sales customers would have to pay higher natural gas rates. This result would not serve the public interest.

Copies of this filing have been served on the Office of the Attorney General – Residential Utilities Division and a summary of the filing has been served on the parties on the attached service lists. Please call me at (612) 330-6089 if you have any questions regarding this filing.

Sincerely,

/s/

SCOTT SCHEFFER
REGULATORY CASE SPECIALIST

Enclosures

c: Service Lists

PUBLIC DOCUMENT
TRADE SECRET DATA HAS BEEN EXCISED

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

David C. Boyd	Chair
J. Dennis O'Brien	Commissioner
Thomas Pugh	Commissioner
Phyllis Reha	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY, A MINNESOTA CORPORATION, FOR APPROVAL OF CHANGES IN CONTRACT DEMAND ENTITLEMENTS

DOCKET NO. G002/M-08-____

PETITION

INTRODUCTION

Pursuant to Minn. Stat. § 216B.16, subd. 7 and Minn. R. Rule 7825.2910, subp. 2, Northern States Power Company, a Minnesota corporation ("Xcel Energy" or the "Company"), submits to the Minnesota Public Utilities Commission ("Commission") this Petition for approval of a Change in Contract Demand Entitlements ("Petition"). Xcel Energy requests approval to implement our 2008-2009 Heating Season Supply Plan effective November 1, 2008, for customers served with natural gas in Minnesota state.

I. Summary of Filing

A one-paragraph summary of the filing accompanies this Petition pursuant to Minnesota Rule 7829.1300, subp. 1.

II. Service on Other Parties

Pursuant to Minn. R. 7829.1300, subp. 2, Xcel Energy has served a copy of this Petition on the Office of the Attorney General-Residential Utilities Division. Pursuant to Minn. R. 7825.2910, subp. 2, Xcel Energy has also served a summary of this Petition on the interveners in the two most recent (2006 and 2004) general rate case filings for the Company's natural gas utility operation. Also, the summary has been served on all parties on Xcel Energy's miscellaneous gas service list.

III. General Filing Information

Pursuant to Minn. R. 7829.1300, subp. 3, Xcel Energy provides the following required information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company
414 Nicollet Mall
Minneapolis, Minnesota 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

James P. Johnson
Assistant General Counsel
Xcel Energy Services Inc.
414 Nicollet Mall — 5th Floor
Minneapolis, Minnesota 55401
(612) 215-4592

C. Date of Filing and Date Modified Rates Take Effect

Xcel Energy is submitting this filing on October 31, 2008. The Company requests Commission approval to implement the rate impact of this filing in our purchase gas adjustment ("PGA") effective with November 1, 2008 usage. Pursuant to Minn. Stat. § 216B.16, subd. 7 and our Purchase Gas Adjustment tariff (Minnesota Gas Rate Book sheet number 5-40, revision 2; sheet number 5-41, revision 3; and sheet number 5-42, revision 2) Xcel Energy has provisionally placed the PGA changes into effect on November 1, 2008, subject to later Commission approval.

D. Statute Controlling Schedule for Processing the Filing

The applicable statute is Minn. Stat. § 216B.16, subd. 7. This statute does not state a specific timeframe for Commission action. The applicable rules are Minn. R. 7825.2910, subp. 2, 7829.1300, 7929.1400 and 7825.2910. Under Minn. R. 7829.0100, subp. 11, the Commission treats all filings that do not fall into a specific category as Miscellaneous Tariff Filings. Minn. R. 7829.1400, subp. 1, permits comments in response to a miscellaneous filing within 30 days of filing, with reply comments 10 days thereafter.

E. Utility Employee Responsible for Filing

Allen D. Krug
Director, Regulatory Administration
Xcel Energy Services Inc.
414 Nicollet Mall — 7th Floor
Minneapolis, Minnesota 55401
(612) 330-6270

IV. <u>Description and Purpose of Filing</u>

This filing seeks Commission approval to allow the Company to implement, through the PGA, changes in our interstate pipeline transportation, storage entitlements, and other demand-related contracts for the upcoming year. Updating our natural gas transportation, storage entitlements, and supply contracts on an annual basis is important to ensuring the Company has access to sufficient capacity to cover the anticipated peak demand of our natural gas customers. To determine the amount required, we consider our forecast of customer needs under Design Day ("DD") conditions. By comparing that anticipated need to our current supply arrangements, we can determine what incremental additions are needed to ensure we can meet our growing customer needs under the most extreme conditions at reasonable cost.

Pursuant to Minn. Rule 7825.2910, Subp. 2, and prior Commission practice, we will provisionally implement the PGA rate changes associated with this filing on November 1, 2008, and respectfully request Commission approval of the revised entitlements effective on November 1, 2008. We list the changes reflected in this filing below.

A. Change in Design Day

Our filing reflects a change in our DD forecast from the 2007-2008 heating season, as described in **Attachment 1**.

B. Change in Resources to meet Design Day

Reflected in this filing are changes in our resources used to meet our DD customer requirements, including entitlements on our pipeline and storage supplier systems: Northern Natural Gas Company ("Northern"), Viking Gas Transmission Company ("Viking"), Great Lakes Transmission Company ("Great Lakes"), ANR Pipeline Company ("ANR"), and Williston Basin Interstate Pipeline Company ("WBI"). Depending on the service, these changes take effect at various times during the heating season.

Attachment 1 and **Attachment 2** provide background information regarding each of these proposed changes. Specifically, **Attachment 1** contains the following documentation required by Minn. R. 7825.2910, Subp. 2:

- a description of the factors contributing to the need for changing demand;
- the Company's DD demand by customer class and the change in DD demand, if any, necessitating the demand revision;
- a summary of the levels of winter versus summer usage for all customer classes; and
- a description of DD gas supply from all sources under the new level, allocation, or form of demand.

The information provided in **Attachment 2** is in response to the October 1, 1993 letter from the OES, and outlines the changes in the Company's Energy Firm DD Requirements, daily pipeline entitlement, and pipeline billing units from the 2007-2008 entitlement levels pending Commission approval in Docket No. G002/M-07-1395.

C. Change in Jurisdictional Allocations

The changes in the DD forecast alter the allocation of entitlements between the Minnesota and North Dakota retail natural gas jurisdictions. This filing reflects this reallocation.

D. Change in Supply Reservation Fees

This filing also reflects updated costs for firm gas supply reservation fees.

E. Heating Season Plan for Use of Financial Instruments

Attachment 3 provides information in response to the reporting requirements established in Docket No. G002/M-08-46 (Order dated May 27, 2008) regarding our use of financial instruments to limit commodity price volatility. The attachment shows a summary of hedge transactions for the 2008-2009 heating season and how each instrument relates to the $32 million cap on such costs.

F. Classification and Billing of Demand Costs

In the Company's 2007 Contract Demand Entitlement filing, Docket No. G002/M-07-1395, we included a proposal to assign some demand costs to interruptible customers. In its Comments dated October 7, 2008 in that docket, the OES recommended approval of the proposal. However, the Commission has not yet acted on our 2007 filing. We again include the proposal, updated for its current effect on prices by customer class, as **Attachment 4.**

Xcel Energy has endeavored to provide all requested information, and has taken steps to ensure the filing's accuracy so that this Petition contains the necessary information for approval of the changes in Contract Demand Entitlements. See List of Attachments below.

Attachment 1 – Filing Requirements Pursuant to Minn. Rule 7825.2910, Subp. 2

Schedule	Title
1	Derivation of Minnesota Jurisdiction Allocation Factor
2	Demand Cost of Gas Impact
3, page 1	Summary of Design Day Demand by Customer Class
3, page 2	Derivation of Actual Peak Day Use Per Customer
4	Historical Sales – Seasonal Usage
5	Firm Supply Entitlements

Attachment 2 – Information Provided in Response to the OES Letter Dated October 1, 1993

Schedule	Title
1, page 1	Demand Profile
1, page 2	Changes to Contract Entitlements
2, page 1	Rate Impact
2, page 2	Derivation of Current PGA Costs

Attachment 3 – Information Provided in Response to Report Requirements in Docket No. G002/M-03-1627 Regarding Use of Financial Instruments to Limit Price Volatility

Schedule	Title
1	Summary of Hedge Transactions

Attachment 4 – Information Provided in Response to OES Recommendation in Docket No. G002/M-07-1395 to Allocate Some Demand Costs to Interruptible Customers

Schedule	Title
1	Calculation of Demand Costs to be Allocated as Commodity Costs
2	Derivation of Current PGA Costs with Some Costs Moved to Commodity Allocation

Xcel Energy respectfully requests Commission approval of the 2008-2009 Heating Season Supply Plan, which enables continued reliable and competitive service for our natural gas customers in Minnesota, effective November 1, 2008, and approval to reflect the costs associated with the revised entitlements in rates through the PGA effective with November cycle billings.

V. Effect of Change upon Xcel Energy Revenue

As calculated in Trade Secret **Attachment 1**, **Schedule 2,** the effect of the proposed changes in demand cost upon Xcel Energy's Minnesota state annual revenue is an increase of **[TRADE SECRET BEGINS TRADE SECRET ENDS]** effective November 1, 2008. The cost change will automatically be reflected in rates through the operation of the Company's PGA clause. The demand rate calculation is shown in **Attachment 2, Schedule 2, Page 2 of 2.**

VI. Miscellaneous Information

Pursuant to Minnesota Rule 7829.0700, Xcel Energy requests that the following persons be placed on the Commission's official service list for this matter:

James P. Johnson
Assistant General Counsel
Xcel Energy Services Inc.
414 Nicollet Mall — 5th Floor
Minneapolis, Minnesota 55401

SaGonna Thompson
Records Specialist
Xcel Energy
414 Nicollet Mall — 7th Floor
Minneapolis, Minnesota 55401

CONCLUSION

Xcel Energy respectfully requests Commission approval of our 2008-2009 Heating Season Supply Plan effective November 1, 2008, and approval to implement the retail rate impact of this filing in our PGA effective with November 1, 2008 usage. The Company will provisionally reflect the change in entitlement costs associated with the revised contract demand entitlements in the Company's November PGA, subject to later Commission approval.

Dated: October 31, 2008

Northern States Power Company,
A Minnesota corporation

/S/

BY: ________________________

AMY LIBERKOWSKI
MANAGER, PRICING AND PLANNING

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

David C. Boyd	Chair
J. Dennis O'Brien	Commissioner
Thomas Pugh	Commissioner
Phyllis Reha	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY, A MINNESOTA CORPORATION FOR APPROVAL OF CHANGE IN CONTRACT DEMAND ENTITLEMENTS

DOCKET NO. G002/M-08-____

SUMMARY

SUMMARY OF FILING

Please take notice that on October 31, 2008, Northern States Power Company, a Minnesota corporation, filed a Request for Change in Contract Demand Entitlements pursuant to Minnesota Rule 7825.2910, Subp. 2. Xcel Energy requests Commission approval to implement its 2008-2009 Heating Season Supply Plan effective November 1, 2008. The costs related to the entitlement changes will be provisionally reflected in retail gas rates through the Purchased Gas Adjustment effective November 1, 2008, subject to later Commission approval.

ATTACHMENT 1

Northern States Power Company,
A Minnesota corporation

Filing Upon Change in Demand
Filing Requirements Pursuant to Minnesota Rule 7825.2910, subp. 2

Northern States Power Company,
A Minnesota corporation

Filing Requirements Pursuant to Minnesota Rule 7825.2910, subp. 2
Filing Upon Change in Demand

A. <u>A description of the factors contributing to the need for change in demand:</u>

As discussed in our Petition, the factors contributing to the need for a change in demand include:

- Increase in DD requirements,
- Resources required to meet the DD and provide an adequate reserve margin,
- Changes in Jurisdictional Allocations, and
- Changes in Supply Reservation Fees.

Each of these factors is discussed below.

<u>Change in Design Day</u>

Xcel Energy's objective for calculating DD customer demand is to forecast anticipated demand at design temperatures accurately so adequate firm supply resources can be planned for and available if DD weather occurs. We recognize that customer response to temperature is dynamic, particularly if we experience severely cold seasonal temperatures. Therefore, we continu to calculate DD using both Actual Peak Use Per Customer Design Day ("UPC DD") and Average Monthly Design Day ("Avg. Monthly DD") methods and considers the results when predicting future DD needs.

In the Company's 2004-2005 Contract Demand Entitlements filing, Docket No. G002/M-05-1813, the Company filed to add a second methodology for calculating our DD. Prior to this docket, we utilized a single methodology, which utilized a linear regression calculation. In the 2004-2005 Contract Demand Entitlements filing, the Company filed to include a second methodology, UPC DD, to ensure that the DD is adequately and accurately estimated.

We project our forecasted firm customer count in Minnesota state to decrease by 2,651 customers (from 431,503 to 428,852) between the 2007-2008 and the 2008-2009 heating season forecasts. Although our current customer count forecast does reflect an increase over actual customers, the reduction reflects that actual firm customer counts were lower than our forecast for the 2007-2008 heating season. Despite the forecasted reduction in customers, we are estimating an increase in DD requirements in Minnesota state of 1,288 Dekatherms ("Dth") (from 683,717 to 685,005) utilizing the UPC DD method as detailed on **Attachment 1, Schedule 3, Page 1 of 2**. While these results seem counterintuitive, we realignedour customer base within the DD demand areas used to calculate the peak-day forecast. This was done in an effort to better align demand with the deliverable capacity used to serve each area of our natural gas service territory.

We believe these changes result in a better peak-day calculation than in the 2007 CD Entitlement filing. Demands are now more aligned with the deliverable capacity that serves each area, rather than allocating demand based solely on county location. This year's regressions also had higher or virtually unchanged R-square coefficients that make them very consistent with past year's models and a good fit to the underlying trends of the new demand areas.

Regression results showed Minnesota areas have a higher percentage of total DD usage than last year, 89% compared to 88%. This is mainly driven by the three areas that had the most customer growth as a result of the changes noted above: Willmar, Paynesville, and Metro East.

DD customer counts for the Willmar and Paynesville areas were 8,590 customers higher than last year including residential and commercial sectors. Most of this gain is attributed to the reallocation of customers from the Watkins area. Both of these areas also had higher weather-related and R-square regression coefficients than last year. Even though most of the customer count changes were offset, the stronger weather-related coefficients increased the peak-day usage in these areas 3,509 Dth over last year's total.

Most of the customer gain in Metro East was in the residential sector, which also had a higher weather-related regression coefficient. The R-square coefficient remained virtually unchanged. Metro East gained customers from Metro West and VGT-Chisago areas. While total customer count forecasts for this area were 2,327 lower than last year, peak-day usage was 1,380 Dth higher, driven predominately by the stronger Metro East weather-related residential coefficient. In total, Minnesota customer counts were 2,651 less than last year's forecast; however, peak-day usage increased 1,288 Dth.

Conversely, lower weather-related regression coefficients led to the decline in peak-day usage from last year in North Dakota. The R-square coefficients remained virtually unchanged. North Dakota customer counts were 1,286 higher than last year, although peak-day usage decreased 4,573 Dth.

The Avg. Monthly DD was also utilized to develop the allocations by state and by service region as shown on **Attachment 1, Schedule 1, Page 1 of 4**. The Avg. Monthly DD calculation is based on the linear regression, which uses March 2005 – December 2007 data as shown on **Attachment 1, Schedule 1, Pages 2 - 4**. Xcel Energy was only able to use 34 months of data instead of the usual 60 months of data because of the change in customer groups. However, in all but a few regions, the regression statistics were very strong with R-squared values in excess of 95%. The regions with R-squared values below 95% were those with lower customer counts. In all, R-squared values were 84% or higher. This method captures the relationship of DD between the states and service regions and incorporates non-electronic pipeline measurements that are estimated in the Actual Peak UPC DD.

The actual use per firm customer data contains the daily total usage for all the firm customers that do not have individual actual peak day information. As described in **Attachment 1, Schedule 3, Page 2 of 2,** the peak day actual use per firm customer remains the same at 1.57393 Dth. For non demand-billed customers, the projected DD is calculated as number of customers multiplied by peak day actual use per customer to yield the Projected DD for these Minnesota state customers of 665,212 Dth. The Small and Large Demand Billed contracted customer Billing Demand of 19,793 Dth and is added to the DD estimate for the Residential, Small Commercial, and Large Commercial classes to determine the total Minnesota state DD Projection of 685,005 Dth as shown on **Attachment 1, Schedule 3, Page 1 of 2**.

We continue to maintain and compare both methodologies. The actual peak days experienced by the Company under non-DD conditions were compared with both the UPC DD and the Avg. Monthly DD to ensure adequate firm resources are available to meet the varied demand requirements of our customers. If cold temperatures occur, then the actual use per customer of 1.57393 Dth, as shown on **Attachment 1, Schedule 3**, **Page 2 of 2**, would be adjusted accordingly.

Likewise, if cold temperatures are not experienced, the actual use per customer of 1.57393 Dth would be maintained (assuming no operating experience contrary to the conditions observed on January 29, 2004). In that case, the UPC DD would be adjusted for updated Residential, Small Commercial, and Large Commercial customer counts and any changes to the contracted Billing Demand for the Small and Large Demand Billed customers.

<u>Change in Resources to Meet Design Day</u>

Attachment 2, Schedule 1, Page 1 of 2 details the demand entitlement changes to meet DD for the Xcel Energy Minnesota company 2008-2009 Heating Season Gas Resource Plan compared to the 2007-08 plan filed in Docket No. G002/M-07-1395. **Attachment 1, Schedule 2** details the demand cost component changes for the 2008-2009 heating season.

Change in Viking Gas entitlements (effective November 1, 2008)

Effective November 1, 2008, Xcel Energy increased firm transportation capacity entitlements on Viking by 15,209 Dth/Day under Rate Schedule FT-A to meet system growth.

As a result of an expiring contract on Viking, Xcel Energy turned back backhaul capacity totaling 22,159 Dth/day on Viking from Chisago, the interconnect between Northern and Viking. In previous years, gas was delivered to Chisago from Northern and then the gas was backhauled on Viking to our town border stations along Viking. However, since the Northern capacity that delivered gas to Chisago was turned back to Northern, we no longer has a use for the backhaul contracts on Viking. Therefore, this backhaul agreement was not renewed and was turned back to Viking.

In addition, Xcel Energy entered into a Precedent Agreement with Viking dated May 15, 2008 to add 37,668 Dth/day of firm transportation from Marshfield, the interconnect between Viking and ANR, with deliveries to Fargo, ND; Moorhead, MN; and Dilworth, MN. During the 2007-2008 heating season, average daily temperatures were below –10 degrees Fahrenheit for a total of 7 days with the coldest average daily temperature of –19 degrees Fahrenheit occurring on February 20, 2008. During that time, Viking experienced pressure drops during certain peak hours on the 18-mile, 8-inch Fargo lateral which serves the communities of Dilworth, MN; Moorhead, MN; and Fargo, ND. Had temperatures reached DD temperatures of –33 degree Fahrenheit, the Fargo lateral would not have been sized adequately to meet the peak hourly load requirements. When evaluating the Viking system in total on a DD, we had adequate firm capacity. However, when looking at the Fargo lateral specifically, on both a daily and hourly basis, there was a capacity shortfall. Therefore after evaluating multiple options, we entered into a cost-based Precedent Agreement with Viking, which will deliver an additional 37,668 Dth/day of firm gas to the affected towns. The project is anticipated to go into service on January 1, 2009. Since the capacity will not be available on November 1, 2008, we have only included 10 months of capacity in the 2008-2009 annual demand expense calculations. We are not proposing a unique allocator for the additional capacity created by the Fargo lateral project. Instead, we are proposing to utilize the standard Minnesota/North Dakota allocation methodology.

The Fargo lateral project will replace 9 miles of existing 8-inch pipe with 12-inch pipe and has a projected cost estimated at **[TRADE SECRET BEGINS TRADE SECRET ENDS]**. The increased capacity entitlements on Viking are expected to fund the project cost over the term of the service agreement. In the Precedent Agreement there is a formula where in the event the project exceeds the estimated cost, we will compensate Viking for those additional costs. If project events cause a change in capacity entitlement costs, we will amend this petition.

Change in Jurisdictional Allocations

1. *Change in Minnesota Jurisdiction Allocation Factor*

The DD allocation factor increased slightly for the Minnesota jurisdiction from 88.79% to 89.34%. As in previous years, we calculate the allocation factor by dividing the DD forecasted demand for Minnesota state by the DD demand for the Company. The Minnesota state, North Dakota state, and Company totals are provided on **Attachment 1, Schedule 1, Page 1 of 4**. The traditional method of Avg. Monthly DD was used to update the allocation factors, since this approach accurately estimates the relationship of DD between the states and regional jurisdictions and incorporates accurately the monthly non-electronic pipeline measurements.

2. *Change in Minnesota Grand Forks Area Jurisdictional Allocation Factor*

The DD allocation factor for East Grand Forks, Minnesota decreased from 14.80% to 14.37%. This decrease is the result of a decrease in DD demand for East Grand Forks, Minnesota relative to the change in DD demand for Grand Forks, North Dakota. The allocation factor is calculated by dividing the DD demand for the city of East Grand Forks, Minnesota by the DD demand total for the Grand Forks area (Grand Forks and East Grand Forks). This allocation factor is used to allocate the costs of the incremental capacity contracted on Viking several years ago related to the Grand Forks area transmission-looping project. Minnesota state, North Dakota state, and Company totals are provided on **Attachment 1, Schedule 1, Page 1 of 4**. The traditional method of Avg. Monthly DD was also used to update the Minnesota Grand Forks Area Jurisdictional Allocation Factor.

3. *Change In Minnesota Fargo Area Jurisdictional Allocation Factor*

The DD allocation factor decreased for Moorhead/Dilworth, Minnesota from 21.75% to 21.58%. The allocation factor is calculated by dividing the DD demand for Moorhead/Dilworth, Minnesota by the total DD demand for Fargo, North Dakota and Moorhead/Dilworth, Minnesota. This allocation factor is used to allocate the costs of the incremental capacity on Viking related to a looping project completed in this area several years ago. Minnesota state, North Dakota state, and Company totals are provided on **Attachment 1, Schedule 1, Page 1 of 4**. The traditional method of Avg. Monthly DD was also used to update the Minnesota Moorhead/Dilworth Area Jurisdictional Allocation Factor.

<u>Change in Supplier Reservation Fees</u>

The total change in existing supplier reservation charges for Minnesota state is **[TRADE SECRET BEGINS TRADE SECRET ENDS]**. **Attachment 1, Schedule 2** lists the changes in Supply Entitlements. Our producer demand expense is attributable to the acquisition of two Emerson peaking supply contracts and two Viking city gate peaking contracts that was done in lieu of acquiring additional annual or heating season interstate pipeline firm transportation service.

B. <u>The Utility's DD demand by customer class and the change in DD demand, if any, necessitating the demand revision:</u>

The DD demand and change in DD demand by class are shown on **Attachment 1, Schedule 3**.

Xcel Energy proposes to increase our capacity reserve margin from 5.52% in November 2007 to 7.2% in November 2008, as described in **Attachment 2, Schedule 1, Page 2 of 2**. We believe this reserve margin is appropriate, given the need to balance the uncertainty of (a) the likelihood of experiencing DD conditions (the most recent extreme cold period occurred in late January to early February 1996), (b) actual consumer demand during DD conditions (given the recent decline in use per customer described in Docket Nos. G002/GR-04-1511 and G002/GR-06-1429), and (c) the need to protect against the potential loss of a source of firm gas supply.

We add firm resources to meet projected firm customer demand and plans to maintain a reserve margin as close as practicable to either the capability of the largest pump at Wescott used to vaporize LNG or to the capability of either of the St. Paul metro propane-air peak shaving plants. Capacity decisions are based on projected demand, and the most economic method of adding capacity often involves adding increments that do not precisely match expected changes in demand. The reserve margin ensures reliability for our firm natural gas customers in Minnesota. The proposed 2008-2009 heating season DD reserve margin for Minnesota state is 49,071 Dth/day or 7.2%.

C. <u>A summary of the levels of winter versus summer usage for all customer classes:</u>

The summary of winter and summer sales by class is included on **Attachment 1, Schedule 4**.

D. <u>A description of DD gas supply from all sources under the new level allocation, or form of demand:</u>

Our firm supply entitlements are shown on **Attachment 1, Schedule 5.**

Northern States Power Company, a Minnesota corporation
DERIVATION OF MINNESOTA JURISDICTION ALLOCATION FACTOR
2008-2009 Heating Season

Service Region (1)	Projected Jan 2009 Firm Res & Comm'l Customers (2)	Contracted Demand by Small & Large Demand Billed Comm'l Customers (3a)	(3b)	Load Variation (Dth/Degree) (4)	Degree per Design Day (5)	Monthly Base Use (Dth) (6)	Unacc. Factor (7)	Res & Comm'l Design Day (Dth) (8)	Total Design Day (Dth) (9)	Jurisdictional Allocation Factors (10)
METRO EAST	303,581	73	11,443	0.0143087	91	2.0874055	1.009	482,998	494,441	
METRO WEST	127	0	0	0.0149483	91	1.4461490	1.009	207	207	
MAINLINE	14,714	9	2,070	0.0142463	91	2.3424329	1.009	22,736	24,806	
MAINLINE-WELCOME	2,151	0	0	0.0105903	88	1.3585562	1.009	2,438	2,438	
WILLMAR	9,508	1	90	0.0113700	88	1.3644507	1.009	11,536	11,626	
PAYNESVILLE	53,129	22	2,605	0.0134142	94	1.9739024	1.009	81,775	84,380	
CHISAGO	2,945	0	0	0.0101629	91	1.3932504	1.009	3,317	3,317	
WATKINS	6,783	1	252	0.0102337	94	1.7759884	1.009	8,032	8,284	
TOMAH	15,223	11	1,528	0.0143308	88	1.1898910	1.009	22,985	24,513	
RED WING	7,574	5	833	0.0131175	88	2.0153276	1.009	10,735	11,568	
GRAND FORKS MN	2,795	1	63	0.0128680	98	1.0149836	1.009	4,200	4,264	14.37%
FARGO MN	10,196	1	909	0.0119170	98	1.1143787	1.009	14,253	15,162	21.58%
MN State	**428,727**	**125**	**19,793**					**665,212**	**685,005**	**89.34%**
GRAND FORKS ND	14,253	0	0	0.0150575	98	1.8522329	1.009	25,414	25,414	85.63%
FARGO ND	30,682	0	0	0.0150616	98	2.1664401	1.009	55,088	55,088	78.42%
WBI ND	940	0	0	0.0117191	98	0.6120009	1.009	1,275	1,275	
ND State	45,875	0	0					81,777	81,777	10.66%
TOTAL	**474,602**	**125**	**19,793**					**746,989**	**766,782**	**100.00%**

(1) Regional areas of the company.
(2) Estimated firm customers.
(3a) Firm Large and Small Commercial Demand Billed customers.
(3b) Firm contracted Design Day entitlement for Large and Small Commercial Demand Billed customers.
(4) Temperature dependent usage as determined by linear regression based on using 34 months Feb. 2005 to Dec. 2007
(5) Degree Days for a Design Day in that region.
(6) Monthly base usage determined by linear regression based on using the same 34 months as in (4).
(7) Factor to correct for unaccounted gas usage.
(8) Estimated Design Day Demand for Firm Residential & Commercial Customers.
(9) Estimated Total Design Day for Firm Residential, Commercial, and Demand Billed Customers.
(10) Jurisdictional allocation factors based on percent of Total Company Design Day Demand.

Northern States Power Company, a Minnesota corporation
DERIVATION OF MINNESOTA JURISDICTION ALLOCATION FACTOR
2008-2009 Heating Season

Division/Region (1)	Projected Firm Jan 2009 Cust (2)	Load Variation (Dth/Deg) (3) X Variable 1	DD/ Design Day (4)	Monthly Base Use (Dth) (5) Intercept	R-Square	Lost & Unacc. Factor (6)	Design Day (Dth) 2009 Unacc. Volume	Load Variation	Day Base	Total	2008 Design Day	Mcf Difference % Diff.	Gross-up to UPC DD Method	Peak Day UPC DD Totals
METRO EAST														
Total Residential	282,831	0.01058745	91	1.45214948	0.9851	0.0090	2,574	272,496	13,510	**288,581**	279,001	9,580	43,299	**331,880**
Total Commercial	20,749	0.06508317	91	10.75378195	0.9782	0.0090	1,172	122,890	7,340	**131,402**	128,777	2,625	19,716	**151,118**
Contract Demand	73	Contract Demand	--	--		--	--	--	--	**11,443**	11,748	(305)	0	**11,443**
	303,654	0.01430870		2.08740552			3,746	395,387	20,850	**431,426**	419,526	11,901	63,015	**494,441**
												2.8%		
METRO WEST														
Total Residential	120	0.01240097	91	1.09308985	0.9651	0.0090	1	135	4	**141**	1,779	(1,638)	21	**162**
Total Commercial	7	0.0576291	91	7.36166648	0.8429	0.0090	0	37	2	**40**	506	(467)	6	**45**
Contract Demand	0	Contract Demand	--	--		--	--	--	--	**0**	0	0	0	**0**
	127	0.01494830		1.44614898			2	172	6	**180**	2,285	(2,105)	27	**207**
												-92.1%		
MAINLINE														
Total Residential	13,301	0.0097997	88	1.51212733	0.9630	0.0090	109	11,470	662	**12,241**	14,639	(2,398)	1,837	**14,078**
Total Commercial	1,414	0.05617396	88	10.16948567	0.9267	0.0090	67	6,988	473	**7,529**	8,186	(657)	1,130	**8,658**
Contract Demand	9	Contract Demand	--	--		--	--	--	--	**2,070**	1,896	174	0	**2,070**
	14,724	0.0142463		2.342432853			176	18,459	1,135	**21,840**	24,721	(2,881)	2,966	**24,806**
												-11.7%		
MAINLINE-WELCOM														
Total Residential	2,026	0.0094935	88	0.917242134	0.9685	0.0090	16	1,693	61	**1,770**	0	1,770	266	**2,035**
Total Commercial	125	0.028371	88	8.513081649	0.8738	0.0090	3	312	35	**350**	0	350	53	**403**
Contract Demand	0	Contract Demand	--	--		--	--	--	--	**0**	0	0	0	**0**
	2,151	0.0105903		1.358556152			19	2,005	96	**2,120**	0	2,120	318	**2,438**
WILMAR														
Total Residential	8,771	0.00936433	88	1.04412991	0.9774	0.0090	68	7,228	301	**7,597**	2,342	5,255	1,140	**8,737**
Total Commercial	737	0.03525651	88	5.17873498	0.9787	0.0090	22	2,287	126	**2,434**	859	1,575	365	**2,799**
Contract Demand	1	Contract Demand	--	--		--	--	--	--	**90**	0	90	0	**90**
	9,509	0.01137		1.36445065			89	9,515	427	**10,120**	3,201	6,919	1,505	**11,626**
												216.1%		
PAYNESVILLE														
Total Residential	47,711	0.00928617	94	1.12565794	0.9839	0.0090	391	41,647	1,767	**43,804**	41,308	2,496	6,572	**50,376**
Total Commercial	5,418	0.04981832	94	9.45104334	0.9810	0.0090	244	25,374	1,685	**27,302**	25,822	1,480	4,096	**31,399**
Contract Demand	22	Contract Demand	--	--		--	--	--	--	**2,605**	2,609	(4)	0	**2,605**
	53,151	0.0134142		1.973902422			634	67,021	3,451	**73,711**	69,739	3,971	10,669	**84,380**
												5.7%		
VGT-CHISAGO														
Total Residential	2,804	0.00885268	91	1.29177875	0.9826	0.0090	21	2,259	119	**2,399**	10,978	(8,579)	360	**2,759**
Total Commercial	141	0.0361776	91	3.40804941	0.8562	0.0090	4	465	16	**485**	4,648	(4,163)	73	**558**
Contract Demand	0	Contract Demand	--	--		--	--	--	--	**0**	224	(224)	0	**0**
	2,945	0.0101629		1.393250395			26	2,724	135	**2,884**	15,850	(12,966)	433	**3,317**
												-81.8%		
WATKINS														
Total Residential	6,548	0.0087259	94	1.3545966	0.9782	0.0090	51	5,371	292	**5,714**	12,097	(6,384)	857	**6,571**
Total Commercial	235	0.05231402	94	13.53205617	0.9560	0.0090	11	1,155	105	**1,271**	3,727	(2,456)	191	**1,461**
Contract Demand	1	Contract Demand	--	--		--	--	--	--	**252**	90	162	0	**252**
	6,784	0.0102337		1.775988387			62	6,526	396	**7,236**	15,914	(8,678)	1,048	**8,284**
												-54.5%		
TOMAH														
Total Residential	13,639	0.0099768	88	0.61131864	0.9754	0.0090	110	11,974	274	**12,359**	12,269	90	1,854	**14,213**
Total Commercial	1,584	0.051914	88	6.17899866	0.9606	0.0090	68	7,238	322	**7,628**	7,612	15	1,144	**8,772**
Contract Demand	11	Contract Demand	--	--		--	--	--	--	**1,528**	1,509	19	0	**1,528**
	15,234	0.0143308		1.189891015			178	19,212	596	**21,514**	21,390	124	2,999	**24,513**
												0.6%		
RED WING														
Total Residential	6,808	0.00946615	88	1.23841669	0.9737	0.0090	54	5,672	277	**6,002**	5,923	79	901	**6,903**
Total Commercial	766	0.04566997	88	8.9364937	0.9248	0.0090	30	3,078	225	**3,332**	3,809	(477)	500	**3,832**
Contract Demand	5	Contract Demand	--	--		--	--	--	--	**833**	2,074	(1,241)	0	**833**
	7,579	0.0131175		2.015327625			83	8,749	502	**10,167**	11,807	(1,639)	1,401	**11,568**
												-13.9%		
GRAND FORKS MN														
Total Residential	2,501	0.00901475	98	0.35798832	0.9704	0.0090	20	2,210	29	**2,259**	2,510	(251)	339	**2,598**
Total Commercial	294	0.04566997	98	6.6035553	0.9658	0.0090	12	1,317	64	**1,393**	1,572	(179)	209	**1,602**
Contract Demand	1	Contract Demand	--	--		--	--	--	--	**63**	63	0	0	**63**
	2,796	0.012868		1.01498362			33	3,526	93	**3,716**	4,145	(429)	548	**4,264**
												-10.4%		
FARGO MN														
Total Residential	9,154	0.00817624	98	0.34736789	0.9650	0.0090	67	7,335	105	**7,507**	8,382	(876)	1,126	**8,633**
Total Commercial	1,042	0.0447946	98	7.85431124	0.9569	0.0090	44	4,574	269	**4,887**	5,443	(556)	733	**5,620**
Contract Demand	1	Contract Demand	--	--		--	--	--	--	**909**	725	184	0	**909**
	10,197	0.011917		1.114378668			111	11,909	374	**13,302**	14,551	(1,248)	1,860	**15,162**
												-8.6%		
MN COMPANY														
Total Residential	**396,214**									**390,373**	**391,229**	**(856)**	**58,572**	**448,944**
Total Commercial	**32,513**									**188,052**	**190,962**	**(2,910)**	**28,216**	**216,268**
Contract Demand	**125**									**19,793**	**20,938**	**(1,145)**	**0**	**19,793**
	428,852									**598,218**	**603,129**	**(4,911)**	**86,787**	**685,005**
												-0.8%		

Northern States Power Company, a Minnesota corporation
DERIVATION OF MINNESOTA JURISDICTION ALLOCATION FACTOR
2008-2009 Heating Season

Division/Region (1)	Projected Firm Jan 2009 Cust (2)	Load Variation (Dth/Deg) (3) X Variable 1	DD/ Design Day (4)	Monthly Base Use (Dth) (5) Intercept	R-Square	Lost & Unacc. Factor (6)	Design Day (Dth) 2009 Unacc. Volume	Load Variation	Day Base	Total	2008 Design Day	Mcf Difference % Diff.	Gross-up to UPC DD Method	Peak Day UPC DD Totals
GRAND FORKS ND														
Total Residential	12,416	0.0087964	98	0.52585477	0.9837	0.0090	98	10,703	215	**11,016**	11,894	(878)	1,653	**12,669**
Total Commercial	1,837	0.05736779	98	10.81550826	0.9735	0.0090	99	10,329	654	**11,082**	11,932	(850)	1,663	**12,745**
Contract Demand	0	Contract Demand	--	--		--	--	--	--	**0**	0	0	0	**0**
	14,253	0.0150575		1.852232927			197	21,032	868	**22,098**	23,826	(1,729)	3,316	**25,414**
												-7.3%		
FARGO ND														
Total Residential	25,995	0.00844498	98	0.62260272	0.9772	0.0090	198	21,514	532	**22,244**	23,851	(1,607)	3,338	**25,582**
Total Commercial	4,687	0.05176041	98	10.72928312	0.9780	0.0090	229	23,774	1,654	**25,657**	28,173	(2,516)	3,850	**29,506**
Contract Demand	-	Contract Demand	--	--		--	--	--	--	**0**	0	0	0	**0**
	30,682	0.01506		2.166440111			427	45,287	2,187	**47,901**	52,024	(4,123)	7,187	**55,088**
												-7.9%		
WBI ND														
Total Residential	811	0.0086161	98	0.59152297	0.9420	0.0090	6	685	16	**707**	0	707	106	**813**
Total Commercial	129	0.0312387	98	0.740818305	0.9236	0.0090	4	395	3	**402**	0	402	60	**462**
Contract Demand	0	Contract Demand	--	--		--	--	--	--	**0**	0	0	0	**0**
	940	0.0117191		0.612000879			10	1,080	19	**1,109**	0	1,109	166	**1,275**
ND COMPANY														
Total Residential	**39,222**									**33,968**	**35,746**	**(1,778)**	**5,097**	**39,064**
Total Commercial	**6,653**									**37,140**	**40,105**	**(2,965)**	**5,573**	**42,712**
Contract Demand	**0**									**0**	**0**	**0**	**0**	**0**
	45,875									**71,108**	**75,851**	**(4,743)**	**10,669**	**81,777**
												-6.3%		
Grand Total														
Total Residential	**435,436**									**424,340**	**426,975**	**(2,634)**	**63,668**	**488,009**
Total Commercial	**39,166**									**225,192**	**231,067**	**(5,875)**	**33,788**	**258,980**
Contract Demand	**125**									**19,793**	**20,938**	**(1,145)**	**--**	**19,793**
	474,727									**669,325**	**678,980**	**(9,655)**	**97,457**	**766,782**
												-1.4%		

Northern States Power Company, a Minnesota corporation
DERIVATION OF MINNESOTA JURISDICTION ALLOCATION FACTOR
2008-2009 Heating Season

CUSTOMERS BY AREA (EXCLUDING DEMAND BILLED)

Area	2009 FORECAST	2008 FORECAST	Difference	%Diff
METRO EAST	303,581	295,307	8,274	2.8%
METRO WEST	127	2,068	-1,941	-93.9%
MAINLINE	14,714	17,771	-3,057	-17.2%
MAINLINE-WELCOME	2,151	NA	NA	NA
WILMAR	9,508	3,117	6,391	205.0%
PAYNESVILLE	53,129	50,930	2,199	4.300%
VGT-CHISAGO	2,945	11,602	-8,656	-74.60%
WATKINS	6,783	14,568	-7,785	-53.40%
TOMAH	15,223	15,317	-94	-0.60%
RED WING	7,574	7622	-47	-0.60%
GRAND FORKS MN	2,795	2,813	-17	-0.6%
FARGO MN	10,196	10,259	-63	-0.6%
MN COMPANY	428,727	431,373	-2,646	-0.6%
GRAND FORKS ND	14,253	13,854	399	2.9%
FARGO ND	30,682	30,735	-53	-0.2%
WBI ND	940	NA	NA	NA
ND COMPANY	45,875	44,589	346	0.8%
TOTAL NSP MN	**474,602**	**475,962**	**(1,360)**	**-0.3%**

Customer #s

	MN	ND	
Res	396,214	39,222	**435,436**
Com	32,513	6,653	**39,166**
Ind	125	0	**125**
	428,852	45,875	**474,727**

Design Day Use By Customer Class

	MN	ND	
Res	448,945	39,064	**488,009**
Com	216,268	42,712	**258,980**
Ind	19,793	0	**19,793**
	685,005	81,777	**766,782**

DESIGN DAY MMBTU DEMAND BY AREA

Area	2009 FORECAST	2008 FORECAST	Difference	%Diff
METRO EAST	494,441	475,971	18,470	3.90%
METRO WEST	207	2,601	-2,394	-92.00%
MAINLINE	24,806	27,881	-3,075	-11.00%
MAINLINE-WELCOME	2,438	NA	2,438	NA
WILMAR	11,626	3645	7,981	219.00%
PAYNESVILLE	84,380	79032	5,348	6.80%
VGT-CHISAGO	3,317	18013	-14,696	-81.60%
WATKINS	8,284	18,104	-9,820	-54.20%
TOMAH	24,513	24,142	371	1.50%
RED WING	11,568	13,154	-1,586	-12.10%
GRAND FORKS MN	4,264	4,710	-446	-9.50%
FARGO MN	15,162	16,464	-1,302	-7.90%
MN COMPANY	685,005	683,717	1,288	0.20%
GRAND FORKS ND	25,414	27,125	-1,711	-6.30%
FARGO ND	55,088	59,226	-4,138	-7.00%
WBI ND	1,275	NA	1,275	NA
ND COMPANY	81,777	86,350	-4,574	-5.30%
TOTAL NSP MN	**766,782**	**770,067**	**-3,285**	**-0.40%**

MN / ND Allocation Factors

2009 DD	2008 DD	
0.8934	0.8879	**MN State Allocation**
0.1066	0.1121	**ND State Allocation**
1.0000	1.0000	

NNG SYSTEM

	2009 FORECAST	2008 FORECAST	Difference	%Diff
METRO EAST	494,441	475,971	18,470	3.90%
METRO WEST	207	2,601	-2,394	-92.00%
MAINLINE	24,806	27,881	-3,075	-11.00%
MAINLINE-WELCOME	2,438	NA	NA	NA
WILMAR	11,626	3,645	7,981	219.00%
PAYNESVILLE	84,380	79,032	5,348	6.80%
VGT-CHISAGO	3,317	18,013	-14,696	-81.60%
WATKINS	8,284	18,104	-9,820	-54.20%
TOMAH	24,513	24,142	371	1.50%
RED WING	11,568	13,154	-1,586	-12.10%
NNG SUBTOTAL	665,579	662,543	3,037	0.50%

Fargo / Grand Forks Allocation Factors

2009 DD	2008 DD	
		Grand Forks Demand Allocator
0.1437	0.148	MN Grand Forks Demand Allocator
0.8563	0.852	ND Grand Forks Demand Allocator
1.0000	1.0000	
		Fargo Demand Allocation
0.2158	0.2175	MN Fargo Demand Allocator
0.7842	0.7825	ND Fargo Demand Allocator
1.00000	1.00000	

VGT SYSTEM

	2009 FORECAST	2008 FORECAST	Difference	%Diff
GRAND FORKS MN	4,264	4,710	-446	-9.50%
FARGO MN	15,162	16,464	-1,302	-7.90%
GRAND FORKS ND	25,414	27,125	-1,711	-6.30%
FARGO ND	55,088	59,226	-4,138	-7.00%
WBI ND	1,275	NA	NA	NA
VGT SUBTOTAL	101,202	107,524	-6,322	-5.90%
VGT & NNG Total	766,782	770,067	-3,285	-0.40%

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Northern States Power Company, a Minnesota corporation

DEMAND COST OF GAS IMPACT - NOVEMBER 2008

CHANGE IN CONTRACT DEMAND ENTITLEMENTS

Contract Demand Entitlement Changes	Volume Dth/Day	Current Monthly Demand Rates	No. of Months	Total Annual Cost
VGT FT-A (Jan - Dec)[1]	(5,913)	$ 3.4671	12	$ (246,011.55)
VGT FT-A (Nov - Mar)[1]	(16,246)	$ 3.4671	5	$ (281,632.53)
VGT FT-A (Jan - Dec)[1]	(300)	$ 3.7671	12	$ (13,561.56)
VGT FT-A (Jan - Dec)[1]	37,668	$ 4.5871	10	$ 1,727,868.83

Total for Change in Pipeline Entitlement $ 1,186,663.19

[TRADE SECRET BEGINS

Change in Supplier Reservation Fees

Total MN & ND Demand Cost Adjustment

Minnesota Allocation Factor (MN/ND Allocated Demand)

MN only Demand Cost Adjustment due to MN/ND Allocated Demand

TRADE SECRET ENDS]

[1] VGT First Revised Volume No. 1, Twelfth Revised Sheet No. 5, Effective January 1, 2006

Northern States Power Company, a Minnesota corporation
SUMMARY OF DESIGN DAY DEMAND BY CUSTOMER CLASS
Design Day: Heating Season 2008-2009

DESIGN DAY CALCULATION

State of Minnesota	Jan-2009 Budget Customer	2009 MMBtu Design Day[1]	2008 MMBtu Design Day[1]	MMBtu Change
Residential	396,214	448,944	445,383	3,561
Commercial	32,513	216,268	217,396	(1,128)
Demand Billed	125	19,793	20,938	(1,145)
State of Minnesota Total	**428,852**	**685,005**	**683,717**	**1,288**
State of North Dakota Total	45,875	81,777	86,350	(4,573)
Total Xcel Energy - Gas Utility Operations	474,727	766,782	770,067	(3,285)

[1] 91 Heating Degree Days for Design Day

DESIGN DAY ESTIMATE FROM ACTUAL USE PER CUSTOMER

Minnesota Company	Jan-2009 Budget Customer	Jan-2008 Budget Customer	Change
Residential	435,436	436,825	(1,389)
Commercial	39,166	39,137	29
TOTAL	474,602	475,962	(1,360)
Peak Day Use/Cust[2]	1.57393	1.57393	
Peak Day Res. & Comm. MMBtus	746,989	749,129	
Demand Billed Customers	125	130	
Contracted Billing Demand of Demand Billed Customers	19,793	20,938	
Projected Design Day (Dth)	766,782	770,067	(3,285)

[2] Determined from Peak Day usage at an average temperature of -15 degrees Fahrenheit on Thursday, Jan. 29, 2004

ENTITLEMENT ESTIMATE PER CUSTOMER

	Jan-2009 Budget	Jan-2008 Budget
Reserve Margin	54,884	42,531
Total Available Capacity	821,666	812,598
Entitlement per Customer	1.7308	1.7068

PUBLIC DOCUMENT
TRADE SECRET DATA HAS BEEN EXCISED

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Schedule 3
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Northern States Power Company, a Minnesota corporation
DERIVATION OF ACTUAL PEAK DAY USE PER CUSTOMER
Design Day: Heating Season 2008-2009

	Description	Values	Units	Equation
(1)	Date of Peak Day	January 29, 2004		
(2)	Day of the Week	Thursday		
(3)	Total Throughput including Peakshaving	648,400	Dth	
(4)	Actual Large and Small Comm'l Demand Billed Usage	(13,863)	Dth	
(5)	Total Throughput including Peakshaving less Demand Billed	634,537	Dth	(5) = (3) - (4)
(6)	Interruptible Customers Status	All Curtailed		
(7)	Average Actual Gas Day Temperature	-15	Deg F	
(8)	Heating Degree Days (HDD) 65 degree base	80	HDDs	(8) = 65 - (7)
		[TRADE SECRET BEGINS		
(9)	Limited Firm/Standby Dth Demand on system		Dth	
(10)	Total Firm Throughput less Ltd F/Stdby & Demand Billed Customers		Dth	(10) = (5) + (9)
(11)	2004 Non-HDD Sensitive Base Dth[1]		Dth	
(12)	Total HDD sensitive Firm throughput		Dth	(12) = (10) + (11)
(13)	Actual Peak Day Dth/HDD		Dth/HDD	(13) = (12) / (8)
		TRADE SECRET ENDS]		
(14)	Base + (Actual Dth/HDD * 91 HDDs)	695,134	Dth	(14) = -(11) + [(13) x 91 HDDs]
(15)	Base + (Actual Dth/HDD * 91 HDDs) + Actual Demand Billed Usage	708,997		(15) = (14) + -(4)
(16)	Average Monthly Projected 2004 Design Day[1]	677,930	Dth	
(17)	Actual Peak Day UPC vs. Avg Monthly Design Day	(31,067)	Dth	(17) = (16) - (15)
(18)	Average Monthly 2004 Design Day Reserve Margin[1]	44,733	Dth	
(19)	Actual 2004 Reserve Margin based on Peak Actuals	13,666	Dth	(19) = (18) + (17)
(20)	January 2004 Projected Firm Residential & Comm'l Customers[1]	441,656	Customers	
(21)	Peak Day Actual Use Per Residential & Comm'l Firm Customer	1.57393	Dth/customer	(21) = (14) / (20)

[1]As described in Company's 2003 - 2004 Contract Demand Filing

Northern States Power Company, a Minnesota corporation
MINNESOTA STATE HISTORICAL SALES - SEASONAL USAGE
(Dth)

Customer Class	Jul-2007	Aug-2007	Sep-2007	Oct-2007	Nov-2007	Dec-2007	Jan-2008	Feb-2008	Mar-2008	Apr-2008	May-2008	Jun-2008	Total	Winter	Summer
Residential	714,633	743,586	660,216	1,076,329	2,240,295	5,169,088	7,026,831	6,880,744	5,694,418	3,905,081	2,129,317	1,063,780	37,304,319	27,011,376	10,292,943
Residential - FMPP (actual usage less cancellations)	12,503	(34,234)	10,421	16,180	60,899	(3,343)	16	0	0	0	0	0	62,442	57,572	4,871
Total Residential	727,137	709,352	670,637	1,092,509	2,301,193	5,165,746	7,026,847	6,880,744	5,694,418	3,905,081	2,129,317	1,063,780	37,366,762	27,068,948	10,297,814
Interdepartmental	6	5	4	53	562	1,331	2,108	1,754	1,760	1,013	696	1,690	10,980	7,515	3,466
Small Commercial Firm	163,486	146,095	152,868	220,058	501,033	1,032,348	1,639,557	1,629,476	1,394,135	966,950	488,922	248,096	8,583,024	6,196,548	2,386,476
Small Comm. Firm - FMPP (actual usage less cancellations)	77	626	(853)	(469)	2,580	37	10	0	0	0	0	0	2,008	2,627	(619)
Large Commercial Firm	253,597	203,637	235,021	345,439	612,703	1,295,158	1,908,366	1,814,207	1,584,139	1,229,451	671,320	381,103	10,534,140	7,214,573	3,319,567
Commercial Firm	417,166	350,363	387,040	565,081	1,116,878	2,328,873	3,550,040	3,445,436	2,980,035	2,197,414	1,160,938	630,889	19,130,153	13,421,263	5,708,890
Small Commercial Demand Billed	9,772	10,145	8,695	12,361	10,733	20,091	16,878	15,257	20,876	17,619	12,848	12,742			
Large Commercial Demand Billed	131,391	129,714	180,055	127,475	180,777	255,477	333,762	285,709	317,226	272,098	184,155	150,513	2,548,352	1,372,950	1,175,401
Large Demand Billed - Generation	4,970	7,490	1,757	1,538	1,390	1,721	2,116	1,546	1,383	1,958	1,800	1,303	28,973	8,156	20,816
Commercial Demand Billed	146,134	147,349	190,506	141,374	192,899	277,289	352,756	302,512	339,485	291,675	198,802	164,558	2,745,342	1,464,942	1,280,399
Total Commercial Firm	563,299	497,712	577,546	706,455	1,309,777	2,606,163	3,902,796	3,747,949	3,319,520	2,489,089	1,359,740	795,446	21,875,494	14,886,205	6,989,289
Total Firm	1,290,436	1,207,064	1,248,184	1,798,964	3,610,970	7,771,908	10,929,643	10,628,693	9,013,938	6,394,170	3,489,058	1,859,226	59,242,256	41,955,153	17,287,103
Small Interruptible	92,583	79,224	81,556	116,616	210,904	459,224	565,422	462,054	482,770	406,910	249,878	135,353	3,342,494	2,180,374	1,162,120
Medium Interruptible	364,915	441,306	674,749	593,261	733,147	787,346	890,027	714,252	783,943	872,942	653,393	456,672	7,965,953	3,908,714	4,057,238
Large Interruptible	174,794	165,665	281,439	329,469	372,276	421,879	413,699	368,628	325,845	243,126	156,998	106,460	3,360,278	1,902,326	1,457,952
Med. & Lg. Interruptible - Generation	310,113	207,881	152,628	68,451	139,165	183,043	63,086	52,186	155,078	38,633	19,947	54,532	1,444,741	592,558	852,183
Total Interruptible	942,405	894,076	1,190,372	1,107,797	1,455,492	1,851,491	1,932,235	1,597,120	1,747,636	1,561,611	1,080,216	753,017	16,113,466	8,583,972	7,529,493
Total Firm and Interruptible	2,232,841	2,101,141	2,438,556	2,906,761	5,066,462	9,623,399	12,861,877	12,225,813	10,761,574	7,955,781	4,569,273	2,612,243	75,355,722	50,539,126	24,816,596
Firm Transportation	16,228	9,606	26,724	20,843	23,338	26,490	29,108	24,255	24,265	21,175	18,440	18,166	258,638	127,456	131,182
Interruptible Transportation	24,456	27,872	29,016	30,470	42,655	53,609	50,025	20,888	72,394	38,190	43,643	31,269	464,487	239,571	224,916
Negotiated Transporation	354,698	192,382	432,672	403,601	597,746	621,622	553,229	496,095	428,867	376,377	456,110	319,864	5,233,263	2,697,559	2,535,704
Interdepartmental Transport - Generation	325,868	321,521	135,424	32,650	48,950	0	39	131,552	173,665	351,345	1,297,941	343,687	3,162,641	354,205	2,808,436
Total Transportation	721,251	551,381	623,836	487,564	712,689	701,721	632,401	672,790	699,191	787,087	1,816,134	712,986	9,119,030	3,418,792	5,700,238
Total Customer Sales	2,954,092	2,652,522	3,062,392	3,394,325	5,779,151	10,325,120	13,494,278	12,898,603	11,460,765	8,742,868	6,385,407	3,325,229	84,474,751	53,957,917	30,516,834
Monthly Heating Degree Days	0	12	115	363	915	1,487	1,603	1,431	1,130	630	264	15	7,964	6,566	1,398

Attachment 1
Schedule 4
Page 1 of 1

Northern States Power Company, a Minnesota corporation
FIRM SUPPLY ENTITLEMENTS

Firm Supplies (1)	**Current Quantity Effective 11/1/2007 Dth/Day**	**Proposed Quantity Effective 11/1/2008 Dth/Day**	**Proposed Quantity Change 11/1/2008 Dth/Day**
A. Upstream Supply			
	[TRADE SECRET BEGINS		
ANR Firm 3rd Party (2)			
ANRP Storage (2)			
ANR Storage Company (3)			
GLGT Firm 3rd Party (3)			
B. Minnesota Company Delivered Supply			
WBI Firm 3rd Party			
VGT Firm 3rd Party			
NNG Firm 3rd Party			
NNG FDD Storage			**TRADE SECRET ENDS]**
LP Peak Shaving	94,300	90,000	(4,300)
LNG Peak Shaving	156,000	156,000	-
TOTAL	812,598	821,666	9,068
C. Minnesota State Delivered Supply			
State of MN Allocators	88.79%	89.34%	
TOTAL	721,506	734,076	12,570

(1) Contracts are available for inspection upon request
(2) ANR feeds VGT.
(3) GLGT feeds NNG or VGT

ATTACHMENT 2

Northern States Power Company,
A Minnesota corporation

Proposal for Entitlement Changes

Information provided in response to the Office of Energy Security letter dated October 1, 1993

PROPOSAL FOR ENTITLEMENT CHANGE
OES Format dated October 1, 1993

1 Provide a peak-day/design-day study by class for the twelve months ending one year from the proposed implementation date of the change(s):

See Attachment 1, Schedule 3.

2 Provide Heating Degree Day ("HDD") data for the most recent twelve month period ending March 31 or September 30. This should include HDD, use per firm customer, and the peak season and off-peak HDD used for calculating the Company's design days:

See Attachment 1, Schedule 1, and Attachment 1, Schedule 4.

3 Historical and Projected Design-Day and Peak Demand Requirements:

Minnesota State

Heating Season1 -1	Number of Firm Customers2 -2	Design Day Requirement (Dth) -3	Total Entitlement plus Storage plus Peak Shaving3 (Dth) -4	Peak Day Sendout (Dth) -5	Heating Degree Days -6	Actual Peak Pay
Proposed: 2008/2009	428,727	685,005	734,076	Unknown	Unknown	Unknown
2007/2008	431,373	683,717	725,975	585,874	72	1/29/2008
2006/2007	424,286	677,733	696,257	568,963	67	2/2/2007
2005/2006	421,570	670,846	691,689	537,660	63	12/5/2005
2004/2005	410,986	649,655	675,120	537,374	60	1/5/2005
2003/2004	401,633	603,468	643,315	561,250	80	1/29/2004
2002/2003	395,807	607,856	642,275	534,385	64.8	1/20/2003

1 Per Annual Financial Reports.

2 Provide data and calculations for projected number of firm customers by class and in total corresponding to the design day requirement.

3 Total entitlement for Minnesota is calculated from the Proposed January 1 Entitlement.

See Attachment 1, Schedule 3.

4 Demand Profile:

See Attachment 2, Schedule 1.

5 Rate Impact:

See Attachment 2, Schedule 2.

Northern States Power Company, a Minnesota corporation
COMPANY DEMAND PROFILE
2008-2009 Heating Season

Contract No.	Type of Capacity or Entitlement	Current Amount Dth or MMBtu	Proposed Change Dth or MMBtu	Proposed Amount Dth or MMBtu	Contract Length and Expiration Date	Change Description	% of Peak Day Entitlement
	Capacity Entitlements						
112183	NNG TF12 BASE (Max)	134,235	0	134,235	10 yrs - 10/31/17		16.34%
112182	NNG TF12 BASE (Disc.)	3,624	0	3,624	10 yrs - 10/31/17		0.44%
112182	NNG TF12 VARIABLE (Disc.)	60,785	0	60,785	10 yrs - 10/31/17		7.40%
112183	NNG TF5 (Max)	63,443	0	63,443	10 yrs - 10/31/17		7.72%
112182	NNG TF5 (Disc.)	28,571	0	28,571	10 yrs - 10/31/17		3.48%
111739	NNG TFX (Nov-Mar)	38,584	0	38,584	2 yrs - 10/31/09		4.70%
112185	TFX (Disc.)	52,526	0	52,526	10 yrs - 10/31/17		6.39%
112186	TFX (Max)	52,025	0	52,025	10 yrs - 10/31/17		6.33%
112186	TFX 2 (Max)	5,800	0	5,800	10 yrs - 10/31/17		Summer Only
112186	TFX 5 (Max)	29,428	0	29,428	10 yrs - 10/31/17		Summer Only
112184	TFX (Disc.)	25,000	0	25,000	10 yrs - 10/31/17		3.04%
		[TRADE SECRET BEGINS					
	VGT to ANR Marshfield (1)						
	VGT to NNG Pierz NNG (2)						**TRADE SECRET ENDS]**
AF0044	VGT FT-A 12 Mos.	29,002	0	29,002	5 yrs - 10/31/13		3.53%
AF0054	VGT FT-A 12 Mos.	5,913	(5,913)	0	15 yrs - 10/31/08	Contract Expired	
AF0044	VGT FT-A (Nov-Mar)	4,239	0	4,239	5 yrs - 10/31/13		0.52%
AF0054	VGT FT-A (Nov-Mar)	16,246	(16,246)	0	15 yrs - 10/31/08	Contract Expired	
AF0054	Capacity Release	(22,159)	22,159	0		Contract Expired	
AF0055	VGT FT-A 12 Mos.	300	(300)	0	4 yrs - 10/31/08	Contract Expired	
AF0055	VGT FT-A (Nov-Mar)	300	(300)	0	4 yrs - 10/31/08	Contract Expired	
AF0055	Capacity Release	(600)	600	0		Contract Expired	
AF0036	VGT FT-A 12 Mos.	5,000	0	5,000	15 yrs - 10/31/11		0.61%
AF0036	VGT FT-A (Nov-Mar)	16,105	0	16,105	15 yrs - 10/31/11		1.96%
AF0036	Capacity Release	(1,105)	1,105	0			
AF0103	VGT FT-A (Apr-Oct)	5,000	0	5,000	15 yrs - 10/31/14		Summer Only
AF0103	VGT FT-A 12 Mos.	10,000	0	10,000	15 yrs - 10/31/14		1.22%
AF0035	VGT FT-A 12 Mos.	5,450	0	5,450	10 yrs - 10/31/10		0.66%
AF0035	VGT FT-A (Nov-Mar)	6,550	0	6,550	10 yrs - 10/31/10		0.80%
AF0035	Capacity Release	(12,000)	0	(12,000)			-1.46%
AF0037	VGT FT-A 12 Mos.	15,600	0	15,600	4/30/2014		1.90%
RF0169	VGT FT-A 12 Mos.	300	(300)	0	2 yrs - 5/31/08	Contract Expired	0.00%
AF0116	VGT FT-A 12 Mos.	1,903	0	1,903	5 yrs - 4/30/11		0.23%
New Fargo Lateral	VGT FT-A 12 Mos.	0	37,668	37,668	8 yrs - 12/31/17		4.58%
	WBI X-13	8,000	0	8,000	20 yrs - 10/31/12		0.97%
	WBI FT-1	461	0	461	20 yrs - 07/01/13		0.06%
	City Gate Deliveries	24,000	10,000	34,000	10 yrs - 10/31/17	Included in Supply Entitlement bel	4.14%
	LP Peak Shaving	94,300	(4,300)	90,000		Grand Forks LPG not operational	10.95%
	LNG Peak Shaving	156,000	0	156,000			18.99%
	Total Design Day Capacity	**812,598**		**821,666**			**100.00%**
	Heating Season Total	812,598		821,666			
	Non-Heating Season Total	320,801		351,956			
	Miscellaneous Entitlements with Reservation Fees						
	Additional Pipeline Entitlements						
	ANR FT-106209 12 Mos. (1)	4,829		4,829	7 yrs - 03/31/15		
	ANR FT-106211 (Summer) (1)	4,921	0	4,921	7 yrs - 03/31/15		
	ANR FT-106211 (Winter) (1)	15,171		15,171	7 yrs - 03/31/15		
	GLT FT-043 (2)	3,799		3,799	16 yrs - 03/31/10		
	GLT FT-142 (Nov-Apr) (2)	15,195		15,195	17 yr - 04/30/11		
	GLT FT-6187 (2)	960		960	7 month 10/31/09		
	NNG SMS (3)	30,650		30,650	15 yrs - 10/31/17	Error of 150 Dth	
	VGT OBA (3)	7,400		7,400	14 yrs - 10/31/09		
	Supply Entitlements (4)						
	[TRADE SECRET BEGINS						
						TRADE SECRET ENDS]	
	Storage Entitlements						
	ANR Pipeline Storage (.953 Bcf)	15,250		15,250	16 yrs - 3/31/08		
	ANR Storage (.994 Bcf)	15,297		15,297	7 yrs - 3/31/14		
	FDD Service (8.085Bcf)	140,230		140,230	4 yrs - 5/31/07 (1.4 Bcf expires 5/31/08)		
	FDD Service (1.875Bcf)	32,518	(32,518)	0	12 yrs - 5/31/17		
	FDD Service (4.5Bcf)	78,050		78,050	15 yrs - 5/31/27		

(1) Not included in total peak deliverability -- feeds VGT (capacity not additive)
(2) Not included in total peak deliverability -- feeds NNG (capacity not additive).
(3) Not included in total peak deliverability -- entitlement delivered by or associated with TF or FT-A service.
(4) Supply contracts containing reservation fees.

Northern States Power Company, a Minnesota corporation

CHANGES TO CONTRACT ENTITLEMENTS AS OF NOVEMBER 1, 2008

	Current Amount Dth	Proposed Change Dth	Proposed Amount Dth
Total MN Company Available Capacity:			
Heating Season	812,598	9,068	821,666
Non-Heating Season	320,801	31,155	351,956
Heating Season Forecasted Design Day	770,067	(3,285)	766,782
Non-Heating Season Forecasted Design Day	N/A	N/A	N/A
Heating Season Capacity Reserve/(Shortage)	42,531	12,353	54,884
Non-Heating Season Capacity Reserve/(Shortage)	N/A	N/A	N/A
Heating Season Capacity Reserve/(Shortage) Margin %	5.5%	1.6%	7.2%
Total MN State Available Capacity:			
State of MN Allocation Factor	88.79%	0.55%	89.34%
State of MN Heating Season Capacity	721,506	12,570	734,076
State of MN Design Day Demand	683,717	1,288	685,005
State of MN Heating Season Capacity Reserve/(Shortage)	37,789	11,282	49,071
State of MN Heating Season Capacity Reserve/(Shortage) Margin %	5.5%	1.6%	7.2%

(1) Entitlement changes for November are included in Available Capacity.
Please reference Attachment 1 Schedule 5 for the detail on supply entitlement changes.

Northern States Power Company, a Minnesota corporation
MINNESOTA STATE RATE IMPACT

Please use the following table to illustrate the financial effects of the poposed change, based on the most recent Purchased Gas Adjustment (PGA), the first PGA which implemented the most recently approved demand change and the last rate case for residential customers and all firm customers. If interruptible customers are affected, please identify the rate impact in the same format as specified bleow.

Date to implement proposed change: November 1, 2008
Docket No. of most recently approved demand change: G002/M-06-1454
Date of last rate case: November 9, 2006, 2007 Test Year
Docket No. of last rate case: G002/GR-06-1429

RESIDENTIAL FIRM

All Cost $/Dth	2007 Rate Case Base Cost of Gas (7)	Last Approved Demand Adjustment: November 2006	Last Month PGA: October 2008 (8)	Current PGA without Adjustment: November 2008 (8)	Current PGA with Adjustment: November 2008 (8)	Change From Last Rate Case Base Cost	Change From Last Approved Demand Adjustment	Change From Last Month PGA	Change From Current PGA
Commodity Cost of Gas (WACOG) (1)	$7.2073	$7.0824	$5.1953	$6.7096	$6.7096	-6.9%	-5.3%	29.1%	0.0%
Demand Cost of Gas -Summer (4)	$0.6030	$0.6608	$0.3548	$0.3850	$0.3880	-35.7%	-41.3%	9.4%	0.8%
Demand Cost of Gas - Winter (4, 5)	$1.1856	$1.2166	$0.9494	$0.9847	$0.9925	-16.3%	-18.4%	4.5%	0.8%
Total Cost of Gas - Summer (2)	$7.8103	$7.7432	$5.5501	$7.0946	$7.0976	-9.1%	-8.3%	27.9%	0.0%
Total Cost of Gas - Winter (2)	$8.3929	$8.2990	$6.1447	$7.6943	$7.7021	-8.2%	-7.2%	25.3%	0.1%
Average Annual Total Usage (6)	35,410,972	36,533,488	35,410,972	35,410,972	35,410,972	0.0%	-3.1%	0.0%	0.0%
Average Annual Total Cost of Gas (2)	$292,314,298	$298,381,973	$212,602,704	$267,432,770	$267,668,717	-8.4%	-10.3%	25.9%	0.1%

ALL FIRM CUSTOMERS (3)

All Cost $/Dth	2007 Rate Case Base Cost of Gas (7)	Last Approved Demand Adjustment: November 2006	Last Month PGA: October 2008 (8)	Current PGA without Adjustment: November 2008 (8)	Current PGA with Adjustment: November 2008 (8)	Change From Last Rate Case Base Cost	Change From Last Approved Demand Adjustment	Change From Last Month PGA	Change From Current PGA
Commodity Cost of Gas (WACOG) (1)	$7.1744	$7.0824	$5.1953	$6.7096	$6.7096	-6.5%	-5.3%	29.1%	0.0%
Demand Cost of Gas -Summer (4)	$0.6030	$0.6608	$0.3548	$0.3850	$0.3880	-35.7%	-41.3%	9.4%	0.8%
Demand Cost of Gas - Winter (4, 5)	$1.1856	$1.2166	$0.9494	$0.9847	$0.9925	-16.3%	-18.4%	4.5%	0.8%
Total Cost of Gas - Summer (2)	$7.7774	$7.7432	$5.5501	$7.0946	$7.0976	-8.7%	-8.3%	27.9%	0.0%
Total Cost of Gas - Winter (2)	$8.3600	$8.2990	$6.1447	$7.6943	$7.7021	-7.9%	-7.2%	25.3%	0.1%
Average Annual Total Usage	53,437,474	55,131,424	53,437,474	53,437,474	53,437,474	0.0%	-3.1%	0.0%	0.0%
Average Annual Total Cost of Gas (2)	$439,038,540	$449,958,270	$320,499,930	$403,239,246	$403,592,629	-8.1%	-10.3%	25.9%	0.1%

(1) Commodity costs include Peakshaving.
(2) Total cost of gas excludes distribution margin
(3) Excludes Demand Billed Customers firm sales.
(4) Rate for Rate Case is a weighted average firm rate since each class has a unique cost of gas.
(5) Not applicable during the summer months
(6) Residential Total Usage for October and November colums were imputed by taking the Residental % of usage in the 2004 Rate Case usage multiplied by the annual usage filed in the PGA for specific months.
(7) As in the compliance filing
(8) Does not include the monthly demand true-up surcharge(credit)

Attachment 2
Schedule 2
Page 1 of 2

Northern States Power Company, a Minnesota corporation

DERIVATION OF CURRENT PGA COSTS

November 2008 - Projected Costs (Actual prices will be determined Nov.1, 2008)*

		Annual Cost	Winter Cost	Total
Demand Cost (Res, Sm & Lg Commercial Firm)				
1.	MN & ND Total Demand	$23,800,319	$27,937,952	
2.	x Minnesota Design Day Ratio (2008 Demand Entitlement Filing)	89.34%	89.34%	
3.	Annual System Demand Allocation to MN	$21,263,205	$24,959,767	
4.	Grand Forks Total Demand	$275,226	$369,376	
5.	x Minnesota Allocator (2008 Demand Entitlement Filing)	14.37%	14.37%	
6.	Annual Grand Forks Demand Allocation to MN	$39,550	$53,079	
7.	Fargo Base Total Demand	$226,748	$113,548	
8.	x Minnesota Allocator (2008 Demand Entitlement Filing)	21.58%	21.58%	
9.	Annual Fargo Demand Allocation to MN	$48,932	$24,504	
10.	Minnesota Total Demand (3 + 6 + 9)	$21,351,687	$25,037,350	
11.	MN State Design Day (2008 Demand Entitlement Filing)	685,005	685,005	
12.	- Small & Large Demand Billed Dth (2008 Demand Entitlement Filing)	19,763	19,763	
13.	Non-Demand Billed Design Day Dth (11-12)	665,242	665,242	
14.	Non-Demand Billed Allocation (10 x 13 / 11)	$20,735,672	$24,315,000	
15.	Demand Billed Cost Allocation (10-14)	$616,015	$722,350	
16.	MN Annual / Seasonal Firm Therm Sales (2007 Rate Case)	534,374,742	402,230,147	
17.	Demand Unit Cost $/Therm (14 / 16)	$0.03880	$0.06045	$0.09925
18.	Demand Cost True-up - Residential, Oct-May			$0.00000
19.	Demand Cost True-up - Commercial, Oct-May			$0.00000
20.	Total Demand Rate - Residential (17 +18)			$0.09925
21.	Total Demand Rate -Commercial (17 + 19)			$0.09925
Demand Cost (Demand Billed)				
22.	Cost Allocated to Demand Billed (15)	$616,015	$722,350	$1,338,365
23.	/ Annual Contract Billing Demand (2008 Demand Entitlement Filing)			2,371,560
24.	Monthly Commercial Demand Billed Demand Rate			$0.56434
Commodity Costs				Monthly Cost
25.	NNG Annual/Best Effort/Viking/WBI/Xcel Energy Pk Shv			$58,456,646
26.	x MN Portion of Monthly Retail Sales			88.34%
27.	MN Portion of Monthly Commodity Costs			$51,640,601
28.	MN Budgeted Calendar Month Retail Therm Sales			76,964,698
29.	Commodity Unit Cost $/Therm (27 / 28)			$0.67096
Total Gas Cost per Therm				
30.	Residential (20 + 29)			**$0.77021**
31.	Small & Large Commercial (21 +29)			**$0.77021**
32.	Small & Large Demand Billed - Demand (24)			**$0.56434**
33.	Small & Large Demand Billed - Commodity; All Interruptible (29)			**$0.67096**

*Commodity costs are projected and for illustrative purposed only.

ATTACHMENT 3

Northern States Power Company,
A Minnesota corporation

Information provided in response to reporting requirements in Docket No. G002/M-03-1627 (order dated January 23, 2004) Regarding use of financial instruments to limit price volatility.

Northern States Power Company, a Minnesota corporation
SUMMARY OF COMPANY HEDGE TRANSACTIONS
2008-2009 Heating Season

							30	31	31	28	31		
							Monthly Volumes (Dth)						
Transaction Date	**Hedge Instrument**	**Counterparty**	**Premium ($/Dth)**	**Call Strike Price**	**Daily Vol (Dth)**	**Basis Point**	**November**	**December**	**January**	**February**	**March**	**Total Volume (Dth)**	**Total Dollars**
[TRADE SECRET BEGINS													
Totals	*Actual Hedge Activity*												

TRADE SECRET ENDS]

ATTACHMENT 4

Northern States Power Company, a Minnesota Corporation
Gas Operations

Information provided in response to the OES Recommendation in Docket No. G0002/M-07-1395 to allocate some demand costs to interruptible customers.

Northern States Power Company, a Minnesota Corporation
Gas Operations

Information provided in response to the OES Recommendation in Docket No. G0002/M-07-1395 to allocate some demand costs to interruptible customers.

In the OES Comments dated October 7, 2008 regarding the Company's 2007-2008 Contract Demand Entitlement filing, Docket No. G002/M-07-1395, the OES recommended that the Commission approve our proposal to allocate some demand costs to interruptible customers, with an effective date of November 1, 2008. Commission action in that docket is pending. The Company has updated the proposal to reflect the impact of the 2008-09 heating season portfolio proposed in this filing.

Timing

As the pertinent demand contracts are long-term contracts and unlikely to change during the year, we propose to review and update, as needed, the calculation of costs annually in the Contract Demand Entitlement filing. If a contract amount changes during the year, we will file a supplement to the Contract Demand Entitlement filing.

The Company proposes to implement the change in demand cost allocation prospectively from the date of Commission action. We will include this revised demand cost allocation in the first PGA feasible after receiving a Commission order.

Mechanics of Proposal

As explained in Docket No. G002/M-07-1395, we propose to assign using commodity allocators a portion of the costs for storage capacity demand charges and pipeline balancing charges. This will result in interruptible sales customers paying for some demand charges. **Attachment 4, Schedule 1** illustrates how we propose to calculate the amount of these demand costs to be included and allocated as commodity costs. **Attachment 4, Schedule 2** illustrates how the costs will be treated in the PGA.

Storage Capacity Demand

Attachment 4, Schedule 1 – Calculation of Demand Costs to Be Allocated as Commodity Costs

Column A – "Winter Cost" is the annual cost of storage capacity demand charges for all storage facilities including Northern's Firm Deferred Delivery ("FDD"), ANR Storage Company, and ANR Pipeline Company storage. These charges only occur in the winter season.

Column B – "Total Winter Sales (Dth)" is the budgeted heating season (November through March) sales for all firm and interruptible sales (non-transportation) customers in dekatherms.

Column C – "Cost per Dth" is the cost per dekatherm to be paid for all gas commodity sales (firm and interruptible) during the heating season. Column C is calculated by dividing Column A by Column B.

Column D – "Total Interruptible Winter Sales (Dth)" is the budgeted heating season sales for interruptible sales customers in dekatherms.

Column E – "Total Winter Cost to Be Allocated as Commodity" is the amount that will be used in the PGA. Column E is calculated by multiplying Column C by Column D.

Attachment 4, Schedule 2 – Derivation of Current PGA Costs

Line 2, Winter Costs – "Less Demand Charge Allocation to Commodity" is the amount from Column E on Schedule 1. The calculated storage capacity demand costs will be subtracted from the total demand costs.

Line 29 – "Demand Charge Allocation to Commodity – Winter" is the amount from Column E divided by five (for the five months in the heating season). The monthly amount of calculated storage capacity demand costs will be added to the total commodity costs. Line 29 will be $0 in the non-winter months (April through October).

Pipeline Balancing

Attachment 4, Schedule 1 – Calculation of Demand Costs to Be Allocated as Commodity Costs

Column A – "Annual Cost" is the annual cost of pipeline balancing services.

Column B – "Total Annual Sales (Dth)" is the budgeted annual sales for all firm and interruptible sales (non-transportation) customers in dekatherms.

Column C – "Cost per Dth" is the cost per dekatherm to be paid for on all gas commodity sales (firm and interruptible) during the year. Column C is calculated by dividing Column A by Column B.

Column D – "Total Interruptible Annual Sales (Dth)" is the budgeted annual sales for interruptible sales customers in dekatherms.

Column E – "Total Annual Cost to Be Allocated as Commodity" is amounted that will be used in the PGA. Column E is calculated by multiplying Column C by Column D.

Attachment 4, Schedule 2 – Derivation of Current PGA Costs

Line 2, Annual Costs – "Less Demand Charge Allocation to Commodity" is the amount from Column E on Schedule 1. The calculated pipeline balancing costs will be subtracted from the total demand costs.

Line 28 – "Demand Charge Allocation to Commodity – Annual" is the amount from Column E divided by twelve. The monthly amount of calculated pipeline balancing costs will be added to the total commodity costs.

Northern States Power Company, a Minnesota corporation

CALCULATION OF COMPANY DEMAND COSTS TO BE ALLOCATED AS COMMODITY COSTS

1. Storage Capacity Demand Charges

	A	B	C A / B	D	E C * D		
	Winter Cost*	Total Winter Sales (Dth)	Cost per Dth	Total Interruptible Winter Sales (Dth)	Total Winter Cost to Be Allocated as Commodity	12-Month Cost	Winter-Month Cost
NNG:FDD	$4,489,060.58	55,931,674	$0.0803	8,696,256	$697,959.09		$697,959.09
ANR	$378,201.60	55,931,674	$0.0068	8,696,256	$58,802.78		$58,802.78
ANRS	$292,206.35	55,931,674	$0.0052	8,696,256	$45,432.24		$45,432.24
	$5,159,468.53		**$0.0922**		**$802,194.12**		**$802,194.12**

2. Pipeline Balancing Charges

	Annual Cost	Total Annual Sales (Dth)	Cost per Dth	Total Interruptible Annual Sales (Dth)	Total Annual Cost to Be Allocated as Commodity	12-Month Cost	Winter-Month Cost
NNG:SMS	$801,804.00	81,791,996	$0.0098	17,886,590	$175,341.60	$175,341.60	
VGT:OBA	$88,800.00	81,791,996	$0.0011	17,886,590	$19,419.13	$19,419.13	
	$890,604.00		**$0.0109**		**$194,760.73**	**$194,760.73**	

*Storage Capacity Demand Charges only occur in the Winter

Attachment 4
Schedule 1
Page 1 of 1

Northern States Power Company, a Minnesota corporation
DERIVATION OF CURRENT PGA COSTS
November 2008 - Projected Costs (Actual prices will be determined Nov.1, 2008)*
Proposal -- with some demand costs moved to commodity allocation

		Annual Cost	Winter Cost	Total
Demand Cost (Res, Sm & Lg Commercial Firm)				
1.	MN & ND Total Demand	$23,800,319	$27,937,952	
2.	Less Demand Charge Allocation to Commodity	$194,761	$802,194	
3.	MN & ND Total Demand Adjusted	$23,605,558	$27,135,758	
4.	x Minnesota Design Day Ratio (2008 Demand Entitlement Filing)	89.34%	89.34%	
5.	Annual System Demand Allocation to MN	$21,089,206	$24,243,086	
6.	Grand Forks Total Demand	$275,226	$369,376	
7.	x Minnesota Allocator (2008 Demand Entitlement Filing)	14.37%	14.37%	
8.	Annual Grand Forks Demand Allocation to MN	$39,550	$53,079	
9.	Fargo Base Total Demand	$226,748	$113,548	
10.	x Minnesota Allocator (2008 Demand Entitlement Filing)	21.58%	21.58%	
11.	Annual Fargo Demand Allocation to MN	$48,932	$24,504	
12.	Minnesota Total Demand (5 + 8 + 11)	$21,177,688	$24,320,669	
13.	MN State Design Day (2008 Demand Entitlement Filing)	685,005	685,005	
14.	- Small & Large Demand Billed Dth (2008 Demand Entitlement Filing)	19,763	19,763	
15.	Non-Demand Billed Design Day Dth (13-14)	665,242	665,242	
16.	Non-Demand Billed Allocation (12 x 15 / 13)	$20,566,693	$23,618,996	
17.	Demand Billed Cost Allocation (12-16)	$610,995	$701,673	
18.	MN Annual / Seasonal Firm Therm Sales (2007 Rate Case)	534,374,742	402,230,147	
19.	Demand Unit Cost $/Therm (16 / 18)	$0.03849	$0.05872	$0.09721
20.	Demand Cost True-up - Residential, Oct-May			$0.00000
21.	Demand Cost True-up - Commercial, Oct-May			$0.00000
22.	Total Demnd Rate - Residential (19 +20)			$0.09721
23.	Total Demnd Rate -Commercial (19 + 21)			$0.09721
Demand Cost (Demand Billed)				
24.	Cost Allocated to Demand Billed (17)	$610,995	$701,673	$1,312,668
25.	/ Annual Contract Billing Demand (2008 Demand Entitlement Filing)			2,371,560
26.	Monthly Commercial Demand Billed Demand Rate			$0.55350
Commodity Costs				Monthly Cost
27.	NNG Annual/Best Effort/Viking/WBI/Xcel Energy Pk Shv			$58,456,646
28.	Demand Charge Allocation to Commodity - Annual (Line 2-Annual / 12-months)			$16,230
29.	Demand Charge Allocation to Commodity - Winter (Line 2-Winter / 5-months), November-March			$160,439
30.	Total Monthly Commodity Costs			$58,633,315
31.	x MN Portion of Monthly Retail Sales			88.34%
32.	MN Portion of Monthly Commodity Costs			$51,796,671
33.	MN Budgeted Calendar Month Retail Therm Sales			76,964,698
34.	Commodity Unit Cost $/Therm (32 / 33)			$0.67299
Total Gas Cost per Therm				
35.	Residential (22 + 34)			**$0.77020**
36.	Small & Large Commercial (23 + 34)			**$0.77020**
37.	Small & Large Demand Billed - Demand (26)			**$0.55350**
38.	Small & Large Demand Billed - Commodity; All Interruptible (34)			**$0.67299**

*Commodity costs are projected and for illustrative purposed only.

CERTIFICATE OF SERVICE

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

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

<u>xx</u> electronic filing

DOCKET NO. G002/M-08-____

Dated this 31st day of October 2008

/s/
____
John Clay

Northern States Power Company d/b/a Xcel Energy

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Xcel Energy: In the Matter of Xcel Energy Gas
Rate Case

OAH Docket No. 15-2500-17791–2
MPUC Docket No. G002/GR-06-1429
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In the Matter of Xcel Energy's Application for
Approval of General Gas Rates

PUC Docket No. G002/GR-04-1511
OAH Docket. No. 3-2500-16292-4
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