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February 11, 2010

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
350 Metro Square Building  
121 7th Place East  
St. Paul, Minnesota 55101-2147

RE: **Corrected Comments of the Minnesota Office of Energy Security**  
Docket No. G002/M-09-1287

Dear Dr. Haar:

Two corrections need to be made to the *Comments* of the Minnesota Office of Energy Security (OES) filed February 10, 2010 in the following matter:

Petition of Northern States Power Company, a Minnesota Corporation (Xcel or the Company), for Approval of Changes in Contract Demand Entitlements.

On Page 1 of the *Comments*, the third bullet point should read:

- increase its reserve margin by 53,780 Dth;

In addition, part of Attachment 1 was not included in the original filing. A complete Attachment 1 is included in this filing.

Sincerely,

/s/ MARLON GRIFFING  
Financial Analyst

MG/sm  
Attachment

**Docket No. G002/M-09-1287  
Demand Entitlement Analysis--Minnesota Jurisdiction\***

Northern States Power Company d/b/a Xcel Energy		Number of Firm Customers				Design-Day Requirement				Total Entitlement Plus Peak Shaving				Reserve Margin	
Heating Season	(1) Number of Customers	(2) Change from Previous Year	(3) % Change From Previous Year	(4) Design Day (Dth)	(5) Change from Previous Year	(6) % Change From Previous Year	(7) Total Design-Day Capacity (Dth)	(8) Change from Previous Year	(9) % Change From Previous Year	(10) Reserve Margin	(11) % of Reserve [(7)-(4)]/(4)				
2009-2010**	433,698	4,846	1.13%	694,487	9,482	1.38%	748,267	15,976	2.18%	53,780	7.74%				
2008-2009**	428,852	(2,651)	-0.61%	685,005	1,288	0.19%	732,291	10,785	1.49%	47,286	6.90%				
2007-2008**	431,503	7,088	1.67%	683,717	5,984	0.88%	721,506	25,249	3.63%	37,789	5.53%				
2006-2007	424,415	2,845	0.67%	677,733	6,887	1.03%	696,257	4,568	0.66%	18,524	2.73%				
2005-2006	421,570	10,584	2.58%	670,846	21,191	3.26%	691,689	16,569	2.45%	20,843	3.11%				
2004-2005	410,986	9,353	2.33%	649,655	46,187	7.65%	675,120	31,805	4.94%	25,465	3.92%				
2003-2004	401,633	5,826	1.47%	603,468	(4,388)	-0.72%	643,315	1,040	0.16%	39,847	6.60%				
2002-2003	395,807	10,913	2.84%	607,856	3,383	0.56%	642,275	1,928	0.30%	34,419	5.66%				
2001-2002	384,894			604,473			640,347								
<b>Average:</b>			1.56%			1.84%			1.95%		4.92%				

Firm Peak-Day Sendout		(13) Change from Previous Year		(14) % Change From Previous Year		(15) Excess per Customer [(7)-(4)]/(1)		(16) Design Day per Customer (4)/(1)		(17) Entitlement per Customer (7)/(1)		(18) Peak-Day Send per Customer (11)/(1)	
Heating Season	(12) Firm Peak-Day Sendout (Dth)	(13) Change from Previous Year	(14) % Change From Previous Year	(15) Excess per Customer [(7)-(4)]/(1)	(16) Design Day per Customer (4)/(1)	(17) Entitlement per Customer (7)/(1)	(18) Peak-Day Send per Customer (11)/(1)						
2009-2010	NA			0.1240	1.6013	1.7253	NA						
2008-2009	601,425	15,551	2.65%	0.1103	1.5973	1.7076	1.4024						
2007-2008	585,874	16,911	2.97%	0.0876	1.5845	1.6721	1.3578						
2006-2007	568,963	31,303	5.82%	0.0436	1.5969	1.6405	1.3406						
2005-2006	537,660	286	0.05%	0.0494	1.5913	1.6407	1.2754						
2004-2005	537,374	(23,876)	-4.25%	0.0620	1.5807	1.6427	1.3075						
2003-2004	561,250	26,865	5.03%	0.0992	1.5025	1.6017	1.3974						
2002-2003	534,385	57,882	12.15%	0.0870	1.5357	1.6227	1.3501						
2001-2002	476,503			0.0932		1.6637							
<b>Average</b>			3.49%	0.0790	1.5699	1.6353	1.3473						

\*-Some numbers may differ from Xcel Attachments due to rounding  
\*\*-Reflects the UPCDD method.

## **CERTIFICATE OF SERVICE**

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

**Minnesota Office of Energy Security  
Corrected Comments**

**Docket No. G002/M-09-1287**

Dated this 11<sup>th</sup> day of February, 2010

**/s/Sharon Ferguson**

Service List Name	First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
OFF_SL_9-1287_09-1287	Andrew	Moratzka	apm@mcmlaw.com	Mackall, Crouse and Moore	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 55402	Paper Service	No
OFF_SL_9-1287_09-1287	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Paper Service	No
OFF_SL_9-1287_09-1287	Bill	Bullard		South Dakota Public Utilities Commiss	Capitol Building Pierre, SD 575015070	Paper Service	No
OFF_SL_9-1287_09-1287	Bob	Bridges	bob.bridges@versopaper.com	Verso Paper	100 East Sartell Street  Sartell, MN 56377	Paper Service	No
OFF_SL_9-1287_09-1287	Brian	Elliott		Clean Water Action Alliance	326 Hennepin Ave. E. Minneapolis, MN 55414	Paper Service	No
OFF_SL_9-1287_09-1287	Burl W.	Haar	burl.haar@state.mn.us	MN Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes
OFF_SL_9-1287_09-1287	Catarina	Zuber		Avant Energy Services	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Paper Service	No
OFF_SL_9-1287_09-1287	Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No
OFF_SL_9-1287_09-1287	David W.	Niles		Avant Energy Services	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Paper Service	No
OFF_SL_9-1287_09-1287	Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Paper Service	No
OFF_SL_9-1287_09-1287	George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Paper Service	No

Service List Name	First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
OFF_SL_9-1287_09-1287	James J.	Bertrand	james.bertrand@leonard.com	Leonard Street & Deinard	Suite 2300 150 South Fifth Street Minneapolis, MN 55402	Paper Service	No
OFF_SL_9-1287_09-1287	James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Paper Service	No
OFF_SL_9-1287_09-1287	James R.	Talcott		Northern Natural Gas Company	1111 South 103rd Street Omaha, NE 68124	Paper Service	No
OFF_SL_9-1287_09-1287	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Paper Service	No
OFF_SL_9-1287_09-1287	Jeffrey A.	Daugherty	jeffrey-daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Paper Service	No
OFF_SL_9-1287_09-1287	John	Lindell	agorud.ecf@state.mn.us	OAG-RUD	900 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes
OFF_SL_9-1287_09-1287	John	Moir	N/A	City of Minneapolis	City Hall Rm 301 M 350 South 5th Street Minneapolis, MN 55415-1376	Paper Service	No
OFF_SL_9-1287_09-1287	John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance	1313 5th St SE Ste 303 Minneapolis, MN 55414	Electronic Service	No
OFF_SL_9-1287_09-1287	Joseph V.	Plumbo		Local Union 23, I.B.E.W.	932 Payne Avenue  St. Paul, MN 55130	Paper Service	No
OFF_SL_9-1287_09-1287	Julia	Anderson	Julia.Anderson@state.mn.us	MN Office Of The Attorney General	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes
OFF_SL_9-1287_09-1287	Kathleen D.	Sheehy	kathleen.sheehy@state.mn.us	Office Of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Paper Service	Yes

Service List Name	First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
OFF_SL_9-1287_09-1287	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No
OFF_SL_9-1287_09-1287	Leslie	Davis		Earth Protector, Inc.	PO Box 11688 Minneapolis, MN 554110688	Paper Service	No
OFF_SL_9-1287_09-1287	Lisa	Veith		City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Paper Service	No
OFF_SL_9-1287_09-1287	Lloyd W.	Grooms	lgrooms@winthrop.com	Winthrop & Weinstine	Suite 3500 225 South Sixth Street Minneapolis, MN 554024629	Paper Service	No
OFF_SL_9-1287_09-1287	Matthew P	Loftus	matthew.p.loftus@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5  Minneapolis, MN 55401	Paper Service	Yes
OFF_SL_9-1287_09-1287	Michael	Loeffler		Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Paper Service	No
OFF_SL_9-1287_09-1287	Michael	Sarafolean	MSarafolean@gerdauameristeel.com	Gerdau Ameristeel US, Inc.	4221 W Boy Scout Blvd Ste 600 Tampa, FL 33607	Paper Service	No
OFF_SL_9-1287_09-1287	Michael	Bradley	bradley@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Paper Service	No
OFF_SL_9-1287_09-1287	Michael	Franklin	mfranklin@mnchamber.com	Minnesota Chamber Of Commerce	400 Robert Street North Suite 1500 St. Paul, MN 55101	Paper Service	No
OFF_SL_9-1287_09-1287	Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center80 South 8th Street Minneapolis, MN 55402	Electronic Service	No

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OFF_SL_9-1287_09-1287	Peter G.	Mikhail	pmikhail@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Paper Service	No
OFF_SL_9-1287_09-1287	Richard	Savelkoul	rsavelkoul@felhaber.com	Felhaber, Larson, Fenlon & Vogt, P.A.	444 Cedar St Ste 2100 St. Paul, MN 55101-2136	Paper Service	No
OFF_SL_9-1287_09-1287	Richard	Johnson	johnsonr@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Center90 South Seventh Street  Minneapolis, MN 55402	Paper Service	No
OFF_SL_9-1287_09-1287	Robert S	Lee	RSL@MCMLAW.COM	Mackall Crouse & Moore Law Offices	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 554022859	Paper Service	No
OFF_SL_9-1287_09-1287	Robert S.	Carney, Jr.			4232 Colfax Ave. S. Minneapolis, MN 55409	Paper Service	No
OFF_SL_9-1287_09-1287	Roger	Boehner	lorenbrft@aol.com		6511 Humboldt Avenue N., #210 Brooklyn Center, MN 55430	Paper Service	No
OFF_SL_9-1287_09-1287	SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	Yes
OFF_SL_9-1287_09-1287	Sandra	Hofstetter	N/A	MN Chamber of Commerce	1140 Mary Hill Cir. Hartland, WI 53029-8009	Paper Service	No
OFF_SL_9-1287_09-1287	Sharon	Ferguson	sharon.ferguson@state.mn.us	State of MN - DOC	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	Yes
OFF_SL_9-1287_09-1287	Steven	Bosacker		City of Minneapolis	City Hall, Room 301M 350 South Fifth Street Minneapolis, MN 554151376	Paper Service	No

Service List Name	First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
OFF_SL_9-1287_09-1287	Tim	Barth		Marathon Petroleum Company	P.O. Box 3128 Houston, TX 77253	Paper Service	No
OFF_SL_9-1287_09-1287	Todd J.	Guerrero	tguerrero@fredlaw.com	Fredrikson & Byron, P.A.	Suite 4000 200 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No
OFF_SL_9-1287_09-1287	Wade	Worthy	lwworthy@marathonoil.com	Marathon Petroleum Company LLC	PO Box 3128 Houston, TX 77253	Paper Service	No
OFF_SL_9-1287_09-1287	William	Grant	bgrant@iwa.org	Izaak Walton League, Midwest Office	1619 Dayton Ave Ste 202 St. Paul, MN 551046206	Paper Service	No
OFF_SL_9-1287_09-1287	William A.	Blazar	bbblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Paper Service	No