

September 24, 2014

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

RE: Minnesota Department of Commerce, Division of Energy Resources' Letter in Lieu of  
Comments Regarding Northern States Power Company, doing business as Xcel Energy's  
Request for an Extension to Submit its Triennial Review of Nuclear Plant Decommissioning  
Accrual Filing  
Docket No. E002/M-14-761

Dear Dr. Haar:

On September 3, 2014, Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) submitted a request to delay filing its triennial review of nuclear plant decommissioning accrual from October 1, 2014 to December 1, 2014. On September 4, 2014, Xcel filed a corrected version. Xcel indicated that it needs additional time to complete the review, which includes cost analyses of various scenarios related to the timing of switching out the Company's dry cask storage units. Specifically, Xcel stated in the corrected version:

The Company needs additional time to complete its analysis. In its Order, the Commission included several new requirements, including an analysis of switching out the dry cask units at 50 years. The requirement to switch out the casks at 50 years adds significant costs under the 100 and 200 year scenarios. We are evaluating these additional costs and how the use of the qualified trust versus the escrow fund can be maximized to reduce cost impacts to customers and maximize earnings growth of the funds over time under these scenarios, as well as scenarios that do not include switching out the casks.

Because it is important for this information to be developed, the Minnesota Department of Commerce, Division of Energy Resources (Department) does not object to Xcel's extension request. The benefits of receiving a complete and thorough filing may justify the requested two-month delay.

The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ SUSAN MEDHAUG  
Supervisor, Energy Regulation & Planning

## CERTIFICATE OF SERVICE

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

**Minnesota Department of Commerce  
Letter**

**Docket No. E002/M-14-761**

Dated this 24<sup>th</sup> day of September 2014

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street  Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_14-761_M-14-761
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-761_M-14-761
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service 1400	Yes	OFF_SL_14-761_M-14-761
Kristen	Eide Tollefson	HealingSystems@earthlink.net	R-CURE	P O Box 129  Frontenac, MN 55026	Paper Service	No	OFF_SL_14-761_M-14-761
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_14-761_M-14-761
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-761_M-14-761
Thomas P.	Harlan	harlan@mdh-law.com	Madigan, Dahl & Harlan, P.A.	222 South Ninth Street Suite 3150 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-761_M-14-761
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_14-761_M-14-761
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-761_M-14-761
Jeff	O'Neill	N/A	Monticello City Hall	505 Walnut St Ste 1  Monticello, MN 55362	Paper Service	No	OFF_SL_14-761_M-14-761

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Perkett	lisa.h.perkett@xcelenergy.com	Xcel Energy Inc.	Capital Asset Acctg Dept 7th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-761_M-14-761
Lauren	Ross McCalib	lrossmccalib@greenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 55369-4718	Electronic Service	No	OFF_SL_14-761_M-14-761
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-761_M-14-761
Kari L	Valley	kari.l.valley@xcelenergy.com	Xcel Energy Service Inc.	414 Nicollet Mall FL 5  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-761_M-14-761