

October 18, 2018

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E,G002/D-18-523

Dear Mr. Wolf:

This letter serves as the Response Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Northern States Power Company's 2018 Annual Update of Remaining Lives and Depreciation Rates for Transmission, Distribution, and General Accounts.

On July 31, 2018, Northern States Power Company, doing business as Xcel Energy (Xcel or the Company) filed its first Annual Update of Remaining Lives and Depreciation Rates for Transmission, Distribution, and General Accounts (Petition) for the Company's electric, gas, and common utilities. The proposed impact to annual depreciation expense is a net decrease of \$449,371, or 0.14 percent; after allocating the Common Utility, the impact for the Electric utility is a decrease of \$707,421 and for the Gas Utility is an increase of \$258,050. Xcel requested that the Commission approve the new depreciation rates effective January 1, 2019.

On September 6, 2018 the Department filed Comments in which it recommended approval of Xcel's proposed depreciation parameters, pending the submittal of additional information regarding future additions and retirements. Additionally, the Department requested in future filings that Xcel provide a current-versus-proposed comparison of the average remaining lives in its next annual filing.

On September 17, 2018, Xcel filed Reply Comments in which the Company provided the required information regarding future additions and retirements. Xcel stated,

The Company does not anticipate at this time that any major future addition or retirement in

the electric, gas, or common utility plant accounts would materially affect the depreciation rates recommended in this filing. While there are large additions planned, the assets being installed should follow the lives established for the current assets, as the type and nature does not differ between the existing and the new assets.

Xcel apologized for the omission in its original Petition and stated that it will include information on future additions and retirements in all future filings. The Company also agreed to provide a current-versus-proposed comparison of the average remaining lives in future annual filings.

The Department appreciates the additional information provided by Xcel in its Reply Comments and concludes that the Company's response is reasonable. The Department recommends that the Commission:

- **Approve** Xcel's proposed depreciation lives and rates in the 2018 Depreciation Study, effective January 1, 2019;
- **Require** Xcel to file its next remaining life depreciation petition by July 31, 2019;
- **Require** Xcel to file a comprehensive five-year depreciation study for its transmission, distribution, and general accounts by July 31, 2022; and
- **Require** Xcel to return the net decrease in electric utility depreciation expense of \$707,421 to ratepayers in the 2019 capital true-up filing in Docket No. E002/GR-15-826.

AB/jl

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
Response Comments**

Docket No. E,G002/D-18-523

Dated this 18th day of October 2018

/s/Sharon Ferguson

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