Xcel Energy®

414 Nicollet Mall
Minneapolis, MN 55401

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May 2, 2019

—Via Electronic Filing—

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

RE: REPLY COMMENTS
2019 ANNUAL REVIEW OF REMAINING LIVES
DOCKET NO. E,G002/D-19-161

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments in response to the Comments received from the Department of Commerce and Office of the Attorney General.

Please note, Attachment B to this response contains economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons and is subject to efforts by the Company to protect the information from public disclosure. For this reason, we ask that the data be treated as trade secret information pursuant to Minn. Stat. § 13.37, subd. 1(b).

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at laurie.j.wold@xcelenergy.com or (612) 330-5510 if you have any questions regarding this filing.

Sincerely,

/s/

LAURIE J. WOLD
SENIOR MANAGER, CAPITAL ASSET ACCOUNTING

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Dan Lipschultz	Commissioner
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY FOR APPROVAL OF THE 2019 REVIEW OF REMAINING LIVES

DOCKET NO. E,G002/D-19-161

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Reply Comments in response to the Comments received from the Department of Commerce, Division of Energy Resources (Department) and Office of the Attorney General – Residential Utilities and Antitrust Division (OAG).

We appreciate the Department and OAG's review of our Petition and provide our Reply to their Comments below.

REPLY TO THE DEPARTMENT

In their Comments, the Department requested that the Company include additional reporting in future remaining lives filings. The Company has no issues providing the requested additional information in future remaining lives filings and will provide the following information going forward:

1) A supplemental schedule showing the total depreciable lives (in addition to the remaining lives) of the Company's electric production facilities;
2) A supplemental schedule with the (1) actual costs to date, (2) projected future costs, and (3) percentage of completion to date for the Minnesota Valley Plant, Key City Plant, Granite City Plant, and Black Dog Units 3-4 as applicable; and
3) Removal updates for the Granite City plant consistent with what we provide for the Key City Plant.

The Department also requested that we reconcile the difference between the Minnesota Valley removal cost estimates shown in Table 4 of our Petition with our response to OAG Information Request No. 10, which is provided as Attachment A to these Reply Comments. As shown in Attachment B to OAG Information Request No. 10 and noted in the written response to that request, the increase was due to an additional $0.9M for the coal yard demolition. Specifically, the increased cost was related to the discovery of greater-than-projected volumes of coal combustion residuals (CCR), legacy coal, contaminated soil and other demolition materials. This larger volume also resulted in the work occurring in winter conditions which is more costly. Project work will be completed in May of this year.

REPLY TO THE OAG

A. Life Extension Request for Electric Production Facilities

1. Extending Unit Lives Outside of the Integrated Resource Plan Process

First, the OAG takes issue with the Company's proposal to extend the remaining lives for Sherco Units 1 and 2 by one year to align the units' depreciable lives with the Company's operational plans for the units. The OAG suggests that the Company's proposal somehow bypasses the Commission's Order in the Company's 2015 Integrated Resource Plan (IRP)[1], but that is not the case. The Commission's IRP Order simply "approve[d] the retirement of Sherco 2 in 2023, and Sherco 1 in 2026." It did not specify whether those retirements were to occur in any particular month of those years. In the concurrent remaining lives docket, the Commission adopted the Department's recommendation of basing the remaining lives on January 1 of each retirement year. In that docket, Commission Staff noted that the "one year difference is not significant and the Commission could accept either proposal."

It is therefore perfectly appropriate for the Company to request a change to the depreciable lives for Sherco Units 1 and 2 in this docket, and this request is not inconsistent with the Commission's last IRP Order. Indeed, as the Department notes, "aligning the financial and operational retirement dates of a capital asset allows for (1) a rational allocation of the asset's cost over its useful life and (2) a better matching of the associated expenses and revenues over time." On this basis, the Department concluded that the Company's request was reasonable. We therefore request that the Commission approve the Company's Petition over the OAG's objection.

[1] Docket No. E002/RP-15-21, *In the Matter of Xcel Energy's 2016-2030 Integrated Resource Plan*, ORDER APPROVING PLAN WITH MODIFICATIONS AND ESTABLISHING REQUIREMENTS FOR FUTURE RESOURCE PLAN FILING, January 11, 2017.

Next, the OAG takes issues with the Company's request to extend the lives of its Sherco 3, Angus Anson, and Blue Lake facilities on the basis of engineering analyses regarding the operational longevity of these units. In particular, the OAG notes that the Company's 2019 IRP is due to be filed this summer and argues that the Commission should abstain from making any decision with respect to these units until considering the "policy or cost factors" that will be addressed in the IRP. We disagree. Again, we note the Department's conclusion that alignment between the operational and financial retirement dates of capital assets results in a rational allocation of the asset's cost over its useful life and a better matching of the associated expenses and revenues over time. And while future IRPs may always result in changes to the Company's operational plans for a particular unit, we believe the Commission should base its decisions as to depreciable lives on the best information available at the time of its decision. Remaining life filings and IRPs will also coexist on the Commission's regulatory calendar, and the postponement of decisions in one docket in order to wait for the resolution of another docket would not be productive or efficient. We believe the Company has provided sufficient analyses and justification to support its request with respect to Sherco 3, Angus Anson, and Blue Lake, and we request that the Commission approve those requests, as recommended by the Department.

2. Delay of Black Dog Unit 5 Dismantling Costs

The OAG also took issue with the Company's request to extend the life for a portion of the Black Dog Unit 5 facility that houses both Units 5 and 6 so that the structure can be dismantled once at the end of both units' lives. In particular, the OAG requests that the Company analyze whether the benefits of dismantling the structure on a consolidated basis outweighs the inflationary impact of delaying the removal of the Unit 5 portion of the structure.

While certain capital assets held within the FERC 341 account for Black Dog Unit 5 may be unused by the remaining Black Dog Unit 6 plant, many of these assets will continue to be necessary for the continued operation of Black Dog Unit 6. The purpose of the division between units 5 and 6 is partially to allocate an appropriate amount of cost to each unit based on the power being provided, and does not necessarily represent the actual assets that will be retired at the end of that plant's life. Only a minority of these assets could actually be retired at the end of Unit 5's life without affecting the operation of Unit 6. While the Company has not completed an asset-by-asset inventory to determine which portions could be retired as of the retirement of Unit 5, it is evident that the cost of removing certain structures such as water supply and air heater systems—all while maintaining the integrity and operability of the surrounding and interconnected assets—would materially outweigh the impact of additional inflation. Indeed, we would anticipate the need for Unit 6 outages and the purchase of replacement power in order to facilitate the degree of dismantlement suggested by the OAG.

That all said, the Company will certainly remove any FERC Account 341 assets that can be removed cost effectively during the removal of other plant assets associated with Unit 5. It is simply not feasible to determine which assets might qualify for such removal until the removal activities are underway. As the Department noted in Comments, utilizing the longer of the two unit's lives is consistent with how both Angus Anson and Blue Lake have been accounted for in the past. It also better mirrors the actual useful lives of the majority of the assets in this account. We therefore request that the Commission approve our request to align the life of the shared building with that of the longest lived associated unit (Unit 6).

The OAG also asked the Company to confirm it will immediately dismantle the non-structures and improvements related assets after Black Dog Unit 5 shuts down. The Company does not believe that it is appropriate to make commitments or assumptions about the date of the dismantlement of Black Dog Unit 5 at this point. When production has ceased the best approach to dismantling the plant will be evaluated based upon the facts and circumstances relevant at that time. The Company will continue to maintain open dialogue with the Commission and intervenors as the retirement date approaches in the equivalent remaining life dockets and rate cases leading up to shut down.

B. Wind Farm Additions

The OAG recommended the Company "provide the total cost of the wind projects it seeks to add to its depreciation expense, including AFUDC." As noted by the OAG, the Company supplied the actual and estimated costs, excluding allowance for funds used during construction (AFUDC), in its response to the OAG information request numbers 4, 5, and 6. Please see Attachment B to these reply comments for the AFUDC for each of the three respective wind farms (Blazing Star 1, Foxtail, and Lake Benton), presented with the total expenditures that were provided in the referenced information requests.

To be clear, the Company is not requesting to change or add to the depreciation expense of these wind projects in this docket. It is simply requesting that the Commission establish the remaining lives and net-salvage rates to be used in calculating expense when these projects go in service. The depreciation expenses shown in this docket are intended to be representative of the impact, but actual depreciation expense will be calculated based on final and actual plant balances in service at the time. It should also be noted that this docket is not intended to set or change electric rates. The lives established here, to the extent they are approved and remain effective, will simply be used as inputs for future rate setting dockets such as rate case and rider filings.

C. Reserve Reallocation

The OAG has again taken issue with the Company's longstanding practice of reallocating depreciation reserve among its facilities in the same functional class, as historically allowed for by FERC. The OAG asks the Commission to depart from its prior Orders and disallow reallocations to cover removal costs for three plants that are now closed.

As discussed below, changes in estimated net salvage and cost of removal expense can be expected to occur up to and including the time removal takes place. Often this removal period is years after the actual shut down of the plant. In the event that a change occurs, reserve reallocation helps to smooth the impact over the lives of all plants in the functional class, and it is allowed for by FERC. Likewise, the Commission has historically approved reserve reallocations in instances of expected over or under recovery estimates in the past.

Without a reserve reallocation, a plant with a zero remaining life would depreciate any change in net salvage rate in the current period, either positive or negative. The reserve reallocation process eliminates this current period expensing for deficiencies and surpluses for units with no remaining life by moving depreciation reserve from the units with life remaining to those without a life remaining. The change in depreciation reserve for the units with remaining life is then recovered over the unit's remaining life through depreciation. This actually decreases the potential intergenerational inequity customers may face by eliminating the potential for spikes, or large increases in a single period. Examples of the reserve reallocation process being approved in the past include a reallocation of Transmission, Distribution, and General reserve in 2012; a reallocation of Minnesota Valley deficiency in 2012; a reallocation of West Faribault surplus in 2008, and a reallocation of United Hospital surplus in 2007.

The OAG has recommended that the Company reallocate Minnesota Valley's potential excess reserve to the production facilities from which that reserve was moved as a part of the realignment that occurred in the 2015 remaining life filing. However, it has also recommended that the Commission disallow reallocation of costs in excess of estimates. The Company disagrees with any approach that is not consistently applied. Moreover, it is simply not possible to prepare cost estimates at the level of accuracy required by the OAG's recommendations. While the Company has contracted with TLG Services in the past to provide an estimate for current financial planning purposes, that TLG study is expressly not a dismantling plan by station or unit. It is therefore not appropriate or reasonable to use that TLG study for purposes of setting plant-by-plant depreciation reserves without the ability to reallocate those reserves as we move into and through a dismantling process.

Additionally, the cost associated with preparing a full dismantling plan for each unit every five years would be much higher than our current TLG study costs—to the point of being impractical. Its utility for plants with longer lives would also be limited, at best, given variations in macro-economic factors and the impact of those factors on labor markets and scrap values. In other words, there will always be a certain amount of uncertainty associated with estimating dismantling costs on a plant-by-plant basis many years into the future, which is precisely why FERC allows for reallocations like those requested in by the Company in this docket (and those approved by the Commission in prior dockets).

The Company continues to believe that reserve reallocations provide the most equitable and sustainable method of handling potential cost increases or decreases. Reserve reallocations help to smooth the impact of normal and expected changes in lives and dismantling estimates as they occur due to changes resource planning, scrap metal prices, dismantling technology, and labor costs. Our request in this docket is consistent with FERC regulations and with the Commission's prior Orders and practice. We note that the Department has not raised any objection to the Company's request on this issue. We request that the Commission approve our request over the OAG's objection.

D. Key City and Granite City

Finally, the OAG noted that the Company opted to maintain the Key City plant in a dormant state in order to provide spare parts for our Granite City plant. The OAG has requested that the Company explain (1) whether or not any spare parts from Key City have been utilized by Granite City; (2) whether the cost of keeping Key City dormant was actually offset by the cost savings of not having to purchase parts for Granite City; and (3) whether the Company intends to sell any parts from Key City and Granite City when the facilities are removed and whether the proceeds from those sales would be used to cover any dismantling reserve shortfall.

As of the date of these Reply Comments, Granite City has not utilized any of the parts from the Key City plant. The Company decided to maintain Key City in a state of dormancy in order to ensure that Granite City could be repaired and could continue to provide power should a component break that would be difficult to find and purchase in the market. The Company explained this at some length in response to the OAG's Comments, in the Company's Reply Comments in Docket No. E,G002/D-17-147 submitted August 28, 2017. It was because the *potential* benefit to Granite City greatly outweighed the cost of keeping Key City dormant that the Company initially decided to delay dismantlement. That continues to be true. In effect, we believe maintaining Key City in a state of dormancy insures the Company and our customers against future problems and component failures at Granite City, and that insurance value is beneficial regardless of whether a component actually fails at Granite City. Similar to the purchase of fire insurance, the fact that fire insurance is never used does not necessarily indicate that it was not worth purchasing.

To the extent that any parts or components from either facility are able to be sold in the process of demolition, those parts and pieces would be treated as scrap or salvage, and would be used to offset the cost of removal, including any shortfall that may or may not occur. Currently, the majority of assumed salvage comes from scrap metals. The most recent TLG study for dismantling, which was used to set the net-salvage estimate, assumed Key City would have $990,431 of scrap credit available to offset dismantling costs. Scrap credit is a highly volatile component of the cost estimate as it relies on the actual state of the plant at retirement, as well as the unit price of scrap metal at the time dismantling occurs. This estimate was performed using 2014 scrap unit prices.

CONCLUSION

The Company appreciates the Department and OAG's review of our Petition. We respectfully request that the Commission approve the Company's Petition as filed.

Dated: May 2, 2019

Northern States Power Company

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☒ **Public Document**

Xcel Energy		Information Request No.	10
Docket No.:	E002,G002/D-19-161		
Response To:	MN Office of the Attorney General		
Requestor:	Ian Dobson		
Date Received:	February 26, 2019		

Question:
For all responses show amounts for Total Company and the Minnesota jurisdictional retail unless indicated otherwise. Total Company is meant to include costs incurred for both regulated and non-regulated operations.

Reference: Initial Petition Table 3.

Update the schedule for the following:

1) Provide the actual costs/credit incurred for each item, as of February 26, 2019.
2) Provide the projected cost/credit for each item, from February 27, 2019 through the end of the dismantling period. Break out the projected amounts by year.
3) Provide a total projected cost/credit for each item (sum of line 1 & 2 above).
4) Explain any discrepancies between the calculated total in line 3 and Xcel Energy's internal estimate.
5) Provide the percent of completion for each item.
6) Provide the 1/1/2019 reserve balance to be used for demolition costs.
7) Repeat lines 1-6 above for the Key City, Minnesota Valley, and Granite City plants.

Response:
1) Please refer to Attachment A to this response showing the actual and forecast removal estimates by year from 2015 through 2025. While we have one more month of actuals for 2019, the annual forecast has not been revised for the remainder of the year so the overall forecasted 2019 amount is still reasonable.
2) See part 1.
3) See part 1.
4) See part 1. There are no discrepancies.
5) See part 1.

6) In Attachment B to the Petition on pages 2 and 3, the reserve balances of Black Dog represent only cost of removal. The sum of the Black Dog steam accounts' reserve is $1,080,318. In addition to this reserve, there is $13,278,414 in a regulatory liability related to the remediation of the coal yard and there is $19,871,586 yet to be recovered over the next nine years for a total of $33.15 million in the regulatory liability. Accumulated reserves for demolition have been reduced by costs already incurred for removal.
7) Please refer to Attachment B to this response for Minnesota Valley. There is no internal estimate at this time for Granite City or Key City. For Minnesota Valley, in the Company's initial petition, the cost for "Ash/Ponds/Coal Yard" was $4.0 million. This has been updated to $4.9 million in Attachment B due to increased costs during the dismantling process. Of the $2.4 million forecasted for 2019, approximately $1.6 million has been spent year-to-date.

   See the table below for Minnesota Valley, Granite City, and Key City reserve balances to be used for demolition costs.

	Minnesota Valley	Granite City	Key City
Demolition costs collected as of 1/1/2019	$ 22,071,207	$ 4,230,678	$ 4,093,558
Estimated demolition costs yet to be collected		189,680	
	$ 22,071,207	$ 4,230,678	$ 4,093,558

Preparer: Courtney Young
Title: Financial Consultant
Department: Capital Asset Accounting
Telephone: 612-330-5897
Date: March 8, 2019

Docket No. E,G002/D-19-161
OAG IR No. 10
Attachment A - Page 1 of 1

Black Dog Steam Removal Estimates by Year

	Actuals				Forecasted								
(Amounts in Millions)	**2015**	**2016**	**2017**	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**	**2024**	**2025**	**Total**	**% Complete as of 1/1/2019**
Identified Items													
Asbestos Remediation	0.80	0.20	-	-	0.10	-	1.00	-	-	-	-	2.10	48%
Ash/Ponds/Coal Yard	5.10	5.60	1.90	5.10	2.30	3.90	0.20	0.20	0.20	0.10	0.10	24.70	72%
Boilers	1.00	2.10	1.30	0.20	-	-	1.00	2.50	2.50	2.00	1.50	14.10	33%
Contingency	-	-	-	-	1.10	1.30	1.10	0.90	1.00	1.90	2.00	9.30	0%
Equipment Removal	2.00	1.30	0.50	-	-	-	3.20	0.50	0.50	0.50	0.50	9.00	42%
Pre-Demolition Cleaning	-	-	0.30	-	-	-	-	-	-	-	-	0.30	100%
Project/Constr Mgmt/Indirects	1.50	1.10	0.40	0.60	0.60	0.50	0.40	0.40	0.40	0.40	0.40	6.70	54%
Structures Demolition	-	-	0.60	1.20	3.40	-	-	-	-	-	-	5.20	35%
Utilities Allowance	-	-	-	0.10	-	-	-	-	-	-	-	0.10	100%
Total Identified	**10.40**	**10.30**	**5.00**	**7.20**	**7.50**	**5.70**	**6.90**	**4.50**	**4.60**	**4.90**	**4.50**	**71.50**	46%
Unidentified Items	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	
Total Identified and Unidentified	**10.40**	**10.30**	**5.00**	**7.20**	**7.50**	**5.70**	**6.90**	**4.50**	**4.60**	**4.90**	**4.50**	**71.50**	46%
Scrap Credit	**(0.20)**	**(0.10)**	**(0.10)**	**(0.10)**	**-**	**-**	**(0.10)**	**(0.10)**	**(0.10)**	**(0.10)**	**(0.10)**	**(1.00)**	50%
Total (including Scrap)	**10.20**	**10.20**	**4.90**	**7.10**	**7.50**	**5.70**	**6.80**	**4.40**	**4.50**	**4.80**	**4.40**	**70.50**	46%

Minnesota Valley Removal Estimates by Year

	Actuals	Forecasted						
(Amounts in Millions)	**2018**	**2019**	**2020**	**2021**	**2022**	**2023**	**Total**	**% Complete as of 1/1/2019**
Identified Items								
Asbestos Remediation	-	-	-	2.10	-	-	2.10	0%
Ash/Ponds/Coal Yard	2.50	2.40	-	-	-	-	4.90	51%
Boilers	-	-	-	-	1.20	-	1.20	0%
Contingency	-	-	-	0.40	2.50	-	2.90	0%
Equipment Removal	-	-	-	-	1.00	-	1.00	0%
Pre-Demolition Cleaning	-	-	-	-	0.20	-	0.20	0%
Project/Constr Mgmt/Indirects	-	-	0.10	-	1.60	0.10	1.80	0%
Structures Demolition	-	-	-	-	1.20	-	1.20	0%
Utilities Allowance	-	-	-	0.10	0.10	-	0.20	0%
Total Identified	**2.50**	**2.40**	**0.10**	**2.60**	**7.80**	**0.10**	**15.50**	16%
Unidentified Items	**-**	**-**	**-**	**-**	**-**	**-**	**-**	
Total Identified and Unidentified	**2.50**	**2.40**	**0.10**	**2.60**	**7.80**	**0.10**	**15.50**	16%
Scrap Credit	**-**	**-**	**-**	**-**	**-**	**-**	**-**	
Total (including Scrap)	**2.50**	**2.40**	**0.10**	**2.60**	**7.80**	**0.10**	**15.50**	16%

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PROTECTED DATA SHADED

Wind Farm	Cost Type	Actual Spend LTD	Total Project Forecast	2016 Total Actuals	2017 Total Actuals	2018 Total Actuals	2019 Total Actuals (Thru Feb)	Mar-19	Apr-19	May-19	Jun-19	Jul-19	Aug-19	Sep-19	Oct-19	Nov-19	Dec-19	2019 Total Forecast	2020 Total Forecast
Blazing Star 1	Total																		
16-777 Project CAP Including AFUDC																			
Foxtail	Total																		
16-777 Project CAP Including AFUDC																			
Lake Benton	Total																		
16-777 Project CAP Including AFUDC																			

CERTIFICATE OF SERVICE

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

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

xx electronic filing

DOCKET NO. E,G002/D-19-161

Dated this 2nd day of May 2019

/s/

____

Jim Erickson
Regulatory Administrator

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