

December 18, 2019

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Commerce Department, Division of Energy Resources**  
Docket No. E,G002/D-19-723

Dear Mr. Wolf:

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

Request for Extension, 2020 Annual Review of Remaining Lives & Five-Year Depreciation and Net Salvage Study for Electric and Gas Production and Gas Storage Facilities

The Petition was filed on November 18, 2019 by:

Laurie J. Wold  
Senior Manager, Capital Asset Accounting  
414 Nicollet Mall  
Minneapolis, MN 55401

In its Petition, Northern States Power Company, d/b/a Xcel Energy (Xcel or the Company) requested that the Minnesota Public Utilities Commission (Commission) grant the Company a three-month extension to submit its 2020 Review of Remaining Lives and Five-Year Depreciation and Net Salvage Study Petition (2020 Annual Review). Order Point 7 of the Commission's October 22, 2019 Order in Docket No. E,G002/D-19-161 directed the Company to "file its next remaining life depreciation petition by February 18, 2020."

Xcel stated that its contractor TLG Services, Inc. (TLG) will not be able to complete the dismantling study, required every five years, in time to incorporate the results into the Company's February 2020 filing. Further, the Company stated that many of the schedules involved in the 2020 Annual Review will incorporate the proposed remaining lives and proposed net salvage from TLG's dismantling study; to file the changes in remaining lives separate from the dismantling study would duplicate efforts and increase regulatory review.

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The Department is supportive of Xcel's request to avoid duplicating efforts for its 2020 Annual Review. Additionally, when possible, the Department favors quality and completeness of information in utility filings over strict adherence to deadlines. Therefore, the Department recommends that the Commission **grant a three-month extension to Xcel and allow the Company to file its 2020 Annual Review by May 18, 2020.**

The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ ANGELA BYRNE  
Financial Analyst

ACB/ar

**CERTIFICATE OF SERVICE**

I, Linda Chavez, 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 DEPARTMENT OF COMMERCE – COMMENTS**

Docket Nos. **E,G002/D-19-723**

Dated this **18th** day of **December, 2019**.

/s/Linda Chavez

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