BEFORE THE NORTH DAKOTA PUBLIC SERVICE COMMISSION
STATE OF NORTH DAKOTA

In the Matter of the Application of Northern Sates Power Company,
A Minnesota Corporation
For Authority to Increase Rates for
Electric Service in North Dakota

Case No. PU-07-776

DIRECT TESTIMONY OF CHARLES W. KING

May 2008

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EXHIBITS

INTRODUCTION / SUMMARY

Q. Please state your name, position and business address.

A. My name is Charles W. King. I am President of the economic consulting firm of Snavely King Majoros O'Connor & Lee, Inc. (Snavely King). My business address is 1111 14th Street, N.W., Suite 300, Washington, D.C. 20005.

Q. Please describe Snavely King.

A. Snavely King, formerly Snavely, King, & Associates, Inc., was founded in 1970 to conduct research on a consulting basis into the rates, revenues, costs, and economic performance of regulated firms and industries. The firm has a professional staff of 12 economists, accountants, engineers, and cost analysts. Most of its work involves the development, preparation, and presentation of expert witness testimony before federal and state regulatory agencies. Over the course of its 38-year history, members of the firm have participated in over a thousand proceedings before almost all of the state commissions and all Federal commissions that regulate utilities or transportation industries.

Q. Have you prepared a summary of your qualifications and experience?

A. Yes. Attachment A is a summary of my qualifications and experience.

Q. Have you previously submitted testimony in regulatory proceedings?

A. Yes. Attachment B is a tabulation of my appearances as an expert witness before state and federal regulatory agencies.

Q. For whom are you appearing in this proceeding?

A. I am appearing on behalf of the Advocacy Staff of the North Dakota Public Service Commission.

Q. What is the objective of your testimony?

A. The objective of my testimony is to present the position of the Advocacy Staff with respect to the relationship between the legislative mandates and the practices of the State of Minnesota and this North Dakota rate case. I will address three aspects of this case that are affected by Minnesota legislation, regulation and practices that create higher costs that the Northern States Power Company ("NSP" or "Company") seeks to recover from North Dakota ratepayers. They are:

- The Minnesota Emission Reduction Program,
- The Minnesota Renewable Energy Standard, and
- Minnesota Depreciation Rates.

I will recommend adjustments in NSP's rate application that reflect the exclusion of excess costs created by these Minnesota programs.

Q. Would you please summarize the adjustments you are recommending?

A. With respect to the Minnesota Metro Emissions Reduction Project ("Minnesota MERP") program, I recommend a restatement of the costs of

the Allen King plant to exclude the rehabilitation of that plant that has been accelerated as a result of the Minnesota MERP. I also recommend restating the costs of the High Bridge Plant to reflect the lower cost alternative of rehabilitation as a coal plant that was proposed by NSP in 2002. Finally, I recommend disallowance of the expenditures for the mercury control program because it is only in the planning stage and has not been implemented and because it probably would not be required but for Minnesota mandates.

With respect to the Minnesota Renewable Energy Standard, I propose to reduce the costs of Grand Meadows Wind Farm and the cost of the transmission facilities that connect the Minnesota wind power generators to the network by 25 percent to reflect the lower capacity factors and higher costs per kWh that result from confining all of the major contracts to Minnesota locations. I also exclude the costs associated with Minnesota-mandated biomass energy and Renewable Development Fund.

With respect to the Minnesota Depreciation Study, I recommend the following adjustments:

- Extend the lives of all steam production plants to the greater of their current forecast life span or 59 years to reflect the experienced life spans of these plants nationally.

- Extend the life of the Prairie Island nuclear plant by 20 years to reflect its impending relicensing.

- Extend the lives of all gas or oil fired other production plants to the greater of their current forecast life span or 40 years to reflect the experienced life spans of these plants nationally.

- Extend the life of account 365 – Distribution Overhead Conductors and Devices by five years to reflect the Company's more aggressive vegetation control program.

- Express the net salvage costs of the mass property transmission and distribution accounts in 2008 dollars rather than in future dollars.

Finally, I propose that the Commission require NSP to file an Integrated Resource Plan specific to North Dakota to ensure that Minnesota mandates do not dictate the type of generation resource added in the future.

THE MINNESOTA EMISSIONS REDUCTION PROGRAM

Q. What is the Minnesota Emissions Reduction Program?

A. The Minnesota MERP is a program initiated by the Minnesota legislature that is designed to reduce the emissions from NSP's coal plants located in the Minnesota Twin Cities metropolitan area.

Q. Please describe the Minnesota legislation that underlies the Minnesota MERP.

A. In its 2001 legislative session, the Minnesota legislature enacted *Minn. Stat. §216B.1692--* ***Emissions-Reduction Rider*** that provided a mechanism for utilities to recover the costs of reducing emissions at three aging but strategic coal-fired plants located in or near the twin-cities metropolitan area.

In 2006, the Minnesota legislature enacted *Minn. Stat. §216B.68 through §216B.685* ***The Minnesota Mercury Emissions Reduction Act ("MMRA")*** for the purpose of reducing mercury emissions from coal-fired electric generation resources. The MMRA allows for the recovery of costs outside of a Minnesota general rate case in order to encourage utilities to reduce these emissions. If other emissions are reduced as part of the effort to reduce mercury emissions, those cost can be include in the proposed recovery mechanism as well.

Finally, the Minnesota Renewable Development Fund ("RDF") is the result of legislation passed in Minnesota in 1999 that required the Company to contribute $500,000 per casket of spent nuclear fuel stored at its Prairie Island plant. In 2003, the statute was amended to require a total of $16 million annually to be contributed to the fund. The North Dakota revenue requirement in this case includes $170,461 in RDF costs.

Q. How did NSP respond to this legislation?

A. In response to the Emissions Reduction Rider legislation, NSP submitted a plan, dated May 3, 2002, to the Minnesota Public Service Commission that called for the rehabilitation of the Allen S. King plant and the replacement of the High Bridge and Riverside plants with gas-fired combined cycle combustion turbine/heat recovery units. The combined

capital cost of this plan, measured in 2001 dollars, was just over $1.0 billion.

On December 11, 2003, a settlement between NSP and Minnesota state agencies was filed with the Minnesota Commission that adopted the $1 billion rehabilitation and replacement program proposed in the May 3, 2002 plan.

On December 21, 2007, NSP submitted a proposal to the Minnesota Commission for significant emissions reductions and power uprates for Units 1 and 2 of its Sherburne County Generating Facility. In addition, two filings were submitted for mercury emissions reductions at the Allen S. King Plant and Sherburne County Unit 3. These projects comply with the MMRA and other Minnesota mandates, but they go beyond the mercury reduction requirements of the Federal Clean Air Mercury Rule (which has now been vacated).

Q. How do the reductions in emissions required by Minnesota compare with those of the federal Environmental Protection Agency ("EPA")?

A. The Minnesota requirements are considerably more stringent than those of the EPA. Exhibit_____(CWK-1) is the NSP response to a Staff information request that provides this comparison for five types of air pollution. The exhibit shows that the Minnesota standards are much stricter for particulate matter and sulfur dioxide. In another response, the

Company reports that the Minnesota mercury standards are far more stringent than those of the EPA.[1]

Q. Is NSP proposing that North Dakota pay for these Minnesota emissions control initiatives?

A. Yes. The Minnesota MERP is responsible for $5,574,461 in added revenue requirement from NSP's North Dakota ratepayers in the current case. Although significant expenditures for the mercury control program will not begin until 2010, the current North Dakota rate increase application contains $438,427 in costs associated with this particular project.

Q. What costs would have been incurred had the Minnesota MERP not been implemented?

A. NSP personnel have stated that the Allen King rehabilitation would have occurred regardless of the Minnesota MERP, but at a later date.[2] As for the High Bridge and Riverside units, the May 3, 2002 plan included an alternative proposal. For approximately $550 million, or about half the cost of the adopted program, the Company could rehabilitate all three plants as coal-fire units. The alternative would substantially reduce emissions, although not as much as the $1 billion plan. Like the $1 billion plan, the alternative was proposed in response to Minnesota legislation,

[1] Response to Staff data request no. 3-4.
[2] Teleconference May 9, 2008.

not federal mandates. A copy of the alternative proposal is attached as Exhibit_____(CWK-2)

It is not clear that the mercury control plan would have been adopted at all were it not for the Minnesota legislation.

Q. What costs do you recommend be charged to North Dakota ratepayers in this case?

A. As noted, but for the Minnesota MERP, the Allen King plant rehabilitation would not have taken place as soon as it did. Accordingly, I recommend that the costs of the rehabilitation be deducted from NSP's revenue requirement. I have based my reduction on the estimate of $385 million for this project that was provided in the 2002 proposal to the Minnesota Commission, Chapter 8 of which is Exhibit_____(CWK-2). The rate base reduction is $24,897,000, and the depreciation expense reduction is $571,000.

As for the other two plants, the modifications to the Riverside Plant are not yet completed, so it is not captured in the revenue requirement in this case. The Company has included eight months' costs of the rehabilitated High Bridge plant, reflecting its in-service date of May 2008. Since this plant is apparently needed, its costs should be allowed, but at the level suggested in the alternative plan set forth in Exhibit_____(CWK-2). I have inflated these costs from 2002 levels to 2008 levels using inflation factors based on the Handy-Whitman indices of production plant

construction costs. The adjustments for this plant is set forth in Exhibit_____(CWK-4).

The mercury emissions control project is apparently in its planning stages and has not been implemented. Moreover, it appears that this program may not be required by federal, as opposed to Minnesota, emissions standards. Accordingly, I recommend that the $438,427 revenue requirement for this program be disallowed.

Q. Do you believe that NSP has no right to recover the costs that you have recommended be disallowed?

A. No. I recommend only that they not be charged to North Dakota ratepayers. NSP has incurred these costs at the behest of the State of Minnesota with no input, let alone approval, from the North Dakota legislature or the North Dakota Public Service Commission. It is therefore appropriate that these costs be recovered from Minnesota – not North Dakota ratepayers.

MINNESOTA RENEWABLE ENERGY STANDARD

Q. What is the Minnesota Renewable Energy Standard ("Minnesota RES")?

A. This is a Minnesota requirement that NSP serve 30 percent of the Minnesota total retail electric sales through renewable energy resources by certain dates.

Q. What is the legislation that established the Minnesota RES?

A. In its 2007 legislative session the Minnesota legislature amended the Renewable Energy Objective Statute to become what is now referred to as the ***Renewable Energy Standard ("RES")*** *Minn. Stat. §216B.1691.* This new standard requires NSP to serve 30 percent of the Minnesota total retail electric sales through renewable energy sources by 2020 with at least 25 percent of that generation from wind energy and the remaining five percent from other eligible energy technologies. There are interim milestones of 15 percent by 2010, 18 percent by 2012, and 25 percent by 2016.

Prior to the REO/RES, the Minnesota legislature required NSP's resource mix to include up to 825 MW of nameplate wind generation and 110 MW of biomass generation, all of it to be derived from Minnesota facilities.

In 1999, the Minnesota legislature established the Renewable Development Fund ("RDF"). Initially, the statute required the Company to contribute $500,000 to the fund for each dry cask storage container remaining at the Prairie Island nuclear plant. In 2003 the Minnesota legislature amended the statute to require a contribution of $16 million annually to the fund with $10.9 million of that amount to be spent on renewable small wind and on-farm biogas energy production incentives.

Finally, Minnesota has legislated a Biomass Power Mandate that requires the company to construct and operate, purchase, or contract to construct and operate 125 MW of farm-grown closed-loop biomass electric generation.

Q. Does North Dakota have similar standards?

A. Yes. In 2007 the North Dakota legislature enacted the ***North Dakota Renewable Energy Objective*** *Chapter 406, Sections 7-9.* This legislation encourages utilities to generate ten percent of all electricity sold at retail within the state from renewable energy and recycled energy sources by the year 2015. A renewable objective of 10% by 2015 is vastly different than a 30% mandate by 2020.

Q. How has NSP responded to these mandates?

A. As of the end of 2007, the Company had contracted for 1075 MW of wind energy through power purchase agreements, constituting one-third of the wind resources needed to meet the Minnesota RES.[3] The Company also has power purchase agreements in place for 110 MW of biomass energy. The Company is currently constructing the Grand Meadow Wind Farm, which will be the Company's first owned wind resource.[4]

Q. What costs has NSP included in its North Dakota revenue requirement in this case that are responsive to the Minnesota RES?

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[3] NSP Response to NDPSC Data Request 3-4.
[4] Id.

A. The costs of the renewable power purchases are recovered in North Dakota's Fuel Clause Adjustment ("FCA") and therefore are not included in the rate increase at issue in this case. However, the rate increase does include $172,860 for approximately 100 MW of refuse-derived (garbage) fuel resources that are owned by the Company; $317,627 for the Grand Meadow Wind Farm; and $319,077 for the transmission facilities that connect the wind generators to the system grid. The North Dakota rate increase also includes $170,461 in RDF costs. [5]

Q. What costs should be charged to North Dakota ratepayers?

A. Two of these items, the $172,860 for refuse-derived energy and the $170,461 for the RDF, are responsive to Minnesota mandates and should be charged to Minnesota ratepayers. For this reason, I recommend that they be disallowed.

As for the wind generation, Exhibit_____(CWK-5) is NSP's response to an information request seeking the identities of the largest wind power contractors. All of them are located in Minnesota, in all likelihood in response to the earlier mandate from the Minnesota legislature that all wind resources be located in that state. The same is true of the Grand Meadows wind farm, which also is located in Minnesota.

Exhibit_____(CWK-6) is a map showing the wind conditions in western Minnesota and eastern North and South Dakota. It demonstrates

[5] Id..

quite clearly that wind conditions are far more favorable to power generation in the Dakotas than in Minnesota. The effect of this disparity has to do with "capacity factors." The capacity factor is simply the wind turbine's actual energy output for the year divided by the energy output if the turbine operated at its maximum capacity for the entire year. I am told that capacity factors and the resulting cost of energy on a kWh basis in North Dakota is about 25 percent lower than those of Minnesota wind farms. For this reason I recommend disallowance of 25 percent of the $317,627 for the Grand Meadow Wind Farm, for a revenue requirement adjustment of $79,406. Similarly, I recommend 25 percent disallowance of the $319,077 in cost for the transmission facilities that connect the wind generators to the system grid. This adjustment amounts to $79,769. The same type of adjustment should be made to the monthly North Dakota FCA for wind energy purchased in the state of Minnesota. In order to keep the FCA clean and void of monthly wind adjustments, the Commission could consider adjusting base rates downward to negate the higher cost of Minnesota wind energy with a tracker to capture any differences in revenue collections and future Minnesota wind costs.

MINNESOTA DEPRECIATION

Q. What depreciation rates are reflected in the revenue requirement that NSP proposes be charged to North Dakota ratepayers?

A. They are the depreciation rates that NSP has submitted to the Minnesota Public Utilities Commission ("PUC") and that have been approved by that commission.

Q. Why does the Minnesota PUC approve the depreciation rates that are incorporated into the revenue requirement that NSP seeks to recover from its North Dakota ratepayers?

A. Hitherto, the North Dakota P.S.C. has not had the staff resources to analyze adequately NSP's depreciation rates.

Q. Should the North Dakota Commission accept the Minnesota approved depreciation rates in this case?

A. No. The Minnesota depreciation rates are too high.

Q. Why do you say that the Minnesota depreciation rates are too high?

A. The Minnesota depreciation rates are too high for the following reasons:

- The service lives that NSP forecasts for some of its steam production plants are shorter than the experienced life spans of these plants nationally.
- The service life of the Prairie Island nuclear plant does not reflect the immanent relicensing of that plant.
- The service lives that NSP forecasts for some of its fossil fuel combustion turbine plants are shorter than the experienced life spans of these plants nationally.

- The service life of distribution plant account 365 – Distribution Overhead Conductors and Devices does not reflect the Company's more aggressive vegetation control program.
- The net salvage costs that are recovered in the mass property transmission and distribution rates are expressed in dollars of future years, not in dollars of the current year.

Q. Have you prepared an exhibit that shows the depreciation rates you recommend for North Dakota jurisdictional plant?

A. Yes. Schedule 1 of Exhibit_____(CWK-7) shows my recommended depreciation rates and the 2008 test year accruals. It also presents the proposed accruals of the Company. As the schedule shows, I recommend that the North Dakota depreciation expense be reduced from $19,345,000 to $15,292,000 or by $4,053,000.

A. DEPRECIATION – GENERAL

Q. Before you discuss the specifics of NSP's depreciation rates, could you please provide a brief discussion of depreciation?

A. Yes. I can do that.

Q. To begin with, just what is depreciation?

A. In 1958, the National Association of Railroad and Utility Commissioners sanctioned the following definition of depreciation:

> "Depreciation," as applied to depreciable utility plant, means the loss in service value not restored by current maintenance, incurred in connection with the consumption or

> prospective retirement of utility plant in the course of service from causes which are known to be in current operation and against which the utility is not protected by insurance. Among the causes to be given consideration are wear and tear, decay, action of elements, inadequacy, obsolescence, changes in the art, changes in demand, and requirements of public authorities.[6]

The second commonly cited definition of depreciation is that of the American Institute of Certified Public Accountants:

> Depreciation accounting is a system of accounting which aims to distribute the cost or other basic value of tangible capital assets, less salvage (if any) over the estimated useful life of the unit (which may be a group of assets) in a systematic and rational manner. It is a process of allocation, not of valuation. Depreciation for the year is the portion of the total charge under such a system that is allocated to the year. Although the allocation may properly take into account occurrences during the year, it is not intended to be a measurement of the effect of all such occurrences.[7]

If depreciation can be defined in a single sentence, I would say that it is the process of recovering the initial investment in tangible capital assets, adjusted for net salvage, in a systematic fashion over the useful service life of the plant, recognizing that a utility plant is typically a group of investments.

Q. Does the calculation of depreciation involve the exercise of judgment?

A. Yes. In this sense, depreciation is similar to setting the rate of return to equity investors. Both are developed from analyses that, while based on quantitative values, require considerable application of judgment. In the

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[6] *Uniform System of Accounts for Class A and Class B Electric Utilities,* 1958, rev. 1962.
[7] American Institute of Certified Public Accountants, *Accounting Research and Terminology Bulletin #1.*

case of rate of return, that judgment pertains to the earnings expectations of investors as indicated by the stock market and corporate financial data. In the case of depreciation, the judgment pertains to the estimation of the future surviving life of plant as indicated by past patterns of retirements.

Q. How should this judgmental characteristic of depreciation influence the commission's approach to the subject?

A. The Commission must recognize that the development of depreciation rates is not a refined science subject to mathematical precision. Because depreciation analysts use judgment in their estimation of depreciation, the Commission must necessarily exercise its own judgment in assessing the rationale and data that underlie alternative depreciation rates. This is why, in this proceeding, the Commission must choose between the two sets of depreciation rates that yield widely differing annual depreciation accruals.

Q. What are the basic parameters required to develop a depreciation rate?

A. At its simplest level, the only parameter that is absolutely required is an estimate of the service life of the plant. The reciprocal of that number can be used as the depreciation rate.

However, because most utility depreciation is applied to accounts that are multiple units of plant, it is usually necessary to estimate the dispersion of retirements around an average service life. In the electric utility industry, this dispersion is usually described in terms of "Iowa Curves," so named

because they were developed at Iowa State University. These curves describe how closely the retirements are grouped around the average service life and whether they tend to occur more rapidly before, after, or coincident with the average service life.

Another parameter that is typically included in the calculation of a depreciation rate is net salvage. Net salvage is the difference between the positive scrap value of the asset's material and the cost of dismantling and removing the asset when it is retired. As traditionally applied, it is expressed as a ratio to the cost of the asset and included as a subtraction (when salvage value exceeds removal cost) or an addition (when removal cost exceeds salvage) to the amount to be recovered. With a few exceptions (e.g. vehicles, work equipment) most electric utility plant has a higher removal cost than its salvage value, so that recognition of net salvage adds to the amount to be recovered.

Finally, most major utilities, but not NSP, employ what is known as "remaining life depreciation." This procedure computes the depreciation rate by dividing the unrecovered net investment, adjusted for net salvage, by the estimated remaining years of the asset (or group of assets). It effectively ensures that any past under- or over-accruals of depreciation are recovered during the remaining life of the asset.

Q. Please illustrate how the parameters you have just described are used to develop depreciation rates?

A. Beginning with the simplest example, assume a single asset with a 20 year life. Its depreciation rate is the reciprocal of 20:

$$1/20 = 5\%$$

Now, let us assume that the asset is expected to have salvage value equivalent to 5 percent of its investment value. The depreciation rate declines:

$$\frac{1-.05}{20} = \frac{.95}{20} = 4.75\%$$

Assume next that the cost of removing this asset amounts to 15 percent of its value. The depreciation rate increases:

$$\frac{1 -.05 + .15}{20} = \frac{1.10}{20} = 5.55\%$$

This is called a "whole life" rate because it is based on the whole life of 20 years. Whole life rates are used by NSP to depreciate its transmission, distribution and general plant. Remaining life rates are used for NSP's production plant. I recommend that the Commission consider using remaining life rates for all categories of plant because such rates provide a self-correcting mechanism to eliminate excess or insufficient depreciation reserve accruals.

To develop a remaining life rate, we must identify some additional items of data: the original investment, the depreciation reserve (the amount of depreciation that has already been recovered), and the remaining life of the asset.

In this illustration, let us assume that the asset originally cost $1 million and that past depreciation charges have recovered $400,000. This means that we have yet to recover $600,000 in original cost, plus a negative net salvage (i.e. net cost of removal) amounting to 10% of the original cost, or $100,000. The total amount yet to be recovered is thus $700,000. Let us further assume that the asset is 10 years old, leaving 10 years of remaining life. In remaining life depreciation, the unrecovered amount is divided by the remaining life years:

$$\frac{\$700,000}{10 \text{ years}} = \$70,000 \text{ required annual accrual}$$

The depreciation rate is then calculated by dividing the annual amount to be recovered by the gross investment, in this case:

$$\frac{\$70,000}{\$1,000,000} = 7.0\%$$

B. NSP'S DEPRECIATION STUDIES

Q. What is the basis for NSP's Minnesota depreciation rates?

A. The Minnesota PUC requires NSP to file several depreciation studies. For its production plants, NSP must file an "Annual Review of Remaining Lives" describing its current assessment of the surviving lives of each plant. Every three years, NSP must file studies of the life, retirement dispersions and net salvage of the transmission, distribution and general plant property accounts.

Q. Has NSP supplied you with these studies?

A. Yes, it has. I have attached them as Exhibit_____(CWK-8)

Q. Have you requested the data, analyses and calculations that underlie these studies?

A. Yes, I have.

Q. Did NSP provide you with this information?

A. No. NSP has declined to provide me with any of the plant and net salvage data underlying these studies, or with the analyses and calculations used to derive the service lives, survivor curves and net salvage parameters in these studies.

Q. What is the effect of this failure by NSP to provide supporting data, analyses and calculations for its depreciation studies?

A. As a result of this failure to provide support, I am unable to perform any independent verification of the parameters that underlie NSP's depreciation rates. Several of the adjustments that I recommend are therefore based only on rough calculations that could be refined with the availability of more detailed data.

C. THE SERVICE LIVES OF STEAM PRODUCTION PLANTS

Q. What steam production plants has NSP listed as serving Minnesota, and presumably North Dakota, ratepayers?

A. A list of NSP's steam plants is provided in Schedule 4 of Exhibit_____(CWK-7).

Q. What service lives does NSP assume for these plants?

A. Column (a) of Schedule 4 of Exhibit_____(CWK-7) shows the in-service year for each plant. Column (b) shows NSP's currently forecast retirement year. The interval between these two dates is the assumed service life., or "life span." These lives range from 44 to 99 years.

Q. Do you agree with these assumed service lives?

A. No. The assumed service lives of the Sherco units, 44 and 45 years, are too short.

Q. What is the basis of your belief that the service lives of these units are too short?

A. The basis of this belief is a study that our firm has performed of the service lives of all steam generating plants that retired between 1900 and 2006. A copy of that study is provided as Exhibit_____(CWK-9). That study reveals that the average steam plants retiring during this period was 59 years.

Q. Have you adjusted the depreciation rates for the Sherco units to reflect the 59- year service life that is indicated by your national study of steam plants?

A. Yes, I have. Schedule 4 of Exhibit_____(CWK-7) shows the development of revised remaining lives for all of NSP's steam plants. Schedule 2 shows

the development of the revised depreciation accruals and rates for steam production plant.

D. PRAIRIE ISLAND NUCLEAR PLANT SERVICE LIFE

Q. What nuclear plants does NSP operate?

A. NSP has two nuclear plants, the Monticello plant and the Prairie Island plant, both located in Minnesota.

Q. What service lives does NSP assume for these plants?

A. NSP assumes 60 years for the Monticello plant and 40 years for the Prairie Island plant.

Q. What is the basis for these assumed service lives?

A. These service lives are based on the term of the Nuclear Regulatory Commission ("NRC") license for each plant. The Monticello plant was originally licensed for 40 years, but that license has been renewed for an additional 20 years. The current license for Prairie Island is for 40 years.

Q. Is the Prairie Island license likely to be renewed?

A. Yes. It is a virtual certainty. NSP filed for a relicensing on April 15 of this year.[8] Although the NRC often attaches conditions to its relicensing, it has yet to deny the relicensing of any nuclear plant.

Q. What service life do you recommend for the Prairie Island plant?

A. I recommend a service life of 60 years.

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[8] NSP Response to Staff data request 5-1.

Q. Have you calculated revised depreciation rates to reflect this 60-year service life?

A. Yes. The development of the revised depreciation accruals and rates for nuclear production plant is presented on Schedule 2 of Exhibit_____(CWK-7).

E. COMBUSTION TURBINE SERVICE LIVES

Q. What is a combustion turbine?

A. A combustion turbine is a generating unit that uses natural gas or oil in a combustion engine to drive a turbogenerator, rather than coal to create steam to drive the turbogenerator. These units are typically used to serve peak loads. The new High Bridge plant is the latest combustion technology. It is two combustion turbines with an additional steam turbine that is powered by the waste heat of the other two turbines.

Q. What combustion turbine generators does NSP operate?

A. Schedule 4 of Exhibit_____(CWK-7) lists the "other production" plants that NSP operates. With the exception of the Grand Meadows Wind Farm, they are all combustion turbines.

Q. What service lives does NSP assume for its combustion turbines?

A. The installation dates and the assumed retirement years are also listed in Schedule 4 of Exhibit___(CWK-7). They range from 30 to 57 years.

Q. Do you agree with these assumed service lives?

A. No. The assumed service lives of five of these plants are too short. They are:

- Angus C. Anson
- Granite City
- High Bridge
- Inver Hills
- Key City

Q. What is the basis of your belief that the service lives of these plants are too short?

A. The basis of this belief is a study that our firm has performed of the service lives of all "Other Production" generating plants that retired between 1915 and 2006. The term "other production" includes all combustion turbine units and also units driven by renewable resources such as biomass, wind and solar power. Since very few of these renewable resource plants have been retired, the study is principally, and probably entirely, composed of combustion turbine units. A copy of that study is provided as Exhibit_____(CWK-10). That study reveals that the average "other production" unit survived 50 years, although some of the bands show lives as short as 43 years.

Q. Have you adjusted the depreciation rates for the five plants to reflect the service lives indicated by your national study of other production plants?

A. Yes. I have assumed that NSP's combustion turbine plants will realize service lives of at least 45 years. Schedule 2 of Exhibit_____(CWK-7) shows the development of revised depreciation accruals and rates for NSP's combustion turbine plants.

ACCOUNT 365 – OVERHEAD CONDUCTORS & DEVICES

Q. What life and survivor curve does NSP propose to use for account 365 -- overhead conductors and devices?

A. The Company is proposing a 35 year average service life with an R1 survivor curve.

Q. Do you agree with this life estimate?

A. No, I do not. While the Company's historical life studies may justify a 35 year life, these are retrospective analyses that cannot anticipate future developments. In this case, the Company is proposing a considerable increase in its tree trimming expenditures. If the tree trimming program is enhanced, the probable effect will be less retirements from the Overhead Conductors account, leading to a longer average service life.

Q. What service life do you recommend?

A. I cannot predict the precise effect of the enhanced tree trimming program, so I am proposing a modest 5-year increase in the average service life of plant in this account. The result is an average service life of 40 years.

REMOVAL COSTS

Q. Does NSP incur removal costs?

A. Yes. NSP expects to incur removal costs for all of its production plants and most of its transmission and distribution plant accounts other than easements and structures.

Q. How does NSP's treat removal costs?

A. For each of the affected plant accounts, NSP adds its forecast removal costs, net of positive salvage, to the total amount of money to be recovered in depreciation rates. In this manner, the depreciation rates recover both the original investment and the expected net cost to remove the plant represented by that investment.

Q. How does NSP forecast its removal costs?

A. NSP uses two procedures depending upon the type of removal costs, one for "mass property" accounts, which include all transmission and distribution accounts, the other for "life span" accounts, which include all of the production plant accounts.

NSP has not provided a description of its procedures for deriving removal costs for the mass property accounts, but it appears that it has employed what I call the Traditional Inflated Future Cost Approach that is used by virtually all utility-sponsored depreciation analysts. It begins with an examination of the history of retirements, removal costs and salvage proceeds. Each year's salvage receipts are then subtracted from that year's

removal costs to derive an annual amount of "net salvage." Except for the transportation and power operated equipment general plant accounts, the removal costs are always much more than the salvage proceeds, so the result is "negative net salvage." These amounts would better be expressed as "positive net removal costs," or just "removal costs." I shall use this term in the remainder of my testimony.

The Company then compares the annual net removal costs to the annual amount of plant retired to derive a "net salvage ratio." The numerator is net salvage (net removal costs) and the denominator is retired plant. Because of the very great year-to-year variability of these ratios, analysts typically average these ratios for varying periods and then select what they deem a representative relationship of net removal costs to retirements. That relationship is then applied to the total value of plant in the account to derive the amount of net removal costs that must be recovered in depreciation rates.

NSP does not use historical data for the "life span" production plants accounts. In these cases, it is necessary to estimate the costs to dismantle plants at the end of their service lives. NSP performs decommissioning studies of the current (this year's) cost to dismantle each plant. This value is added to the amount to be recovered.

Q. How large are the removal cost ratios that NSP has been using?

A. They are very large. NSP's transmission and distribution removal cost ratios are presented in Column (b) of Schedule 5 of Exhibit_____(CWK-7). These net removal cost ratios range as high as 90 percent for Account 364 – Poles, Towers, and Fixtures. A 90 percent removal cost ratio means that for every dollar of depreciation recovered, another $.90 is accrued against future removal costs.

Q. Can you quantify annual removal cost accruals that NSP proposes to charge to North Dakota ratepayers for NSP's electric transmission and distribution plant in that state?

A. Yes. Column (c) in Schedule 5 in Exhibit _____(CWK-7) shows the proposed removal cost accruals that NSP proposes to charge for its electric transmission and distribution plant based on December 31, 2003, plant in service. The total company accruals for the transmission plant are $84,667,442. Divided by the composite average service life of 39.91 years, the annual accrual is $2,122,218.

For distribution plant the total amount to be accrued for removal costs is $227,104,000. Divided by the average service life of 36.10 years, the annual accrual is $6,290,870.

Q. How large are the actual removal costs that NSP has experienced?

A. The actual annual cost of removal, salvage, and net removal costs for the years 2002 through 2006 are shown in Schedule 5 of Exhibit_____(CWK-7). Actual net removal cost expenditures for transmission plant averaged

$1,035,884, and the average expenditure for distribution plant was $252,456.

Q. How do NSP's proposed removal cost accruals compare with the actual removal cost experience?

A. The average accrual rate for transmission plant has been twice the actual net removal cost experience. The average accrual rate for distribution plant has been 25 times the actual average net removal cost.

Q. How does NSP derive such large removal cost accruals for electric plant when the actual experienced removal costs are so much less?

A. As discussed earlier, NSP develops its removal cost allowances by comparing the original cost of retirements during recent years with the experienced costs of removal during those same years. The ratio of the removal costs to plant retirements becomes the removal cost ratio. As noted, this ratio can be as high as 90 percent. These ratios are used to develop annual removal cost rates. When those rates are applied to all plant in service as of the December 31, 2006, the result is the annual accruals shown in Schedule 5 of Exhibit No._____(CWK-7).

The reason for these very high removal cost ratios is that NSP is comparing dollars of very different values. The numerator of the removal cost ratio is recently incurred removal costs covering the years since about 2002. The denominator is the original cost of the plant retired. Those costs can be quite old. The average service life of the poles account is 40 years.

If a 40 year-old pole is retired in 2006, its original cost is expressed in 1976 dollars. According to Handy-Whitman, the construction cost index in 1976 for the poles account mains was 142. By 2006, that index had increased to 480, or 3.4 times.[9]

With many low-valued dollars in the numerator and a few high-valued dollars in the denominator, the removal cost ratio is very high. As noted, these high ratios result in proposed removal cost accruals that are 25 times the actual removal cost expenditures. This is why I refer to NSP's procedure as the Traditional Inflated Future Cost Approach, or "TIFCA."

Q. Is this procedure valid?

A. No. The TIFCA procedure charges ratepayers now for the nominal dollar cost of removing plant at the time of its retirement. Under NSP's proposed removal cost ratios, when NSP installs a pole in 2008, it would add a removal cost allowance of $.90 to each dollar of construction cost recovered. Yet that $.90 is expressed in a cost that projects into the future the same past inflation that occurred between the time recently removed plant was installed and the time it was removed.

It is altogether inappropriate to charge costs to present day North Dakota ratepayers that are expressed in dollar values that will not be experience until many years from now.

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[9] Handy-Whitman Bulletin No. 165, p. G-6-6 and G-6-8, Whitman Requardt & Associates, LLP, Baltimore, MD.

Moreover, the TIFCA-based removal cost ratios are inconsistent with the removal, or dismantlement costs that are applied to production plants. For the production plants, NSP estimates dismantlement costs in current dollar values. For the transmission and distribution account, it expresses them in less valuable future dollars.

Q. What is the resolution to this problem?

A. The preferred solution is to restate the future removal costs back to their present dollar value using the inflation rates indicated by recent Handy-Whitman indices. This adjustment would render the mass property removal costs comparable to those that apply to the production plants. In this case, however, the Company has not provided the account detail that enables me to make these calculations. As an alternative, I propose to add an allowance to depreciation expense equivalent to the average of the last five years' net removal cost experience. The amount of this allowance is set forth in Schedule 5 of Exhibit_____(CWK-7).

SUMMARY OF ADJUSTMENTS

Q. Would you please summarize the adjustments you have recommended in this testimony?

A. Yes. Exhibit _____(CWK-11) provides a summary of my adjustments. As the exhibit shows, I have recommended eight adjustments. I have been able to identify both the expense and rate base changes of three of these

adjustments. For the remaining five, I have only the effect on total revenue requirement as quantified by the Company. I have supplied these adjustments to Mr. Majoros for incorporation into his revenue requirements model.

INTEGRATED RESOURCE PLANS

Q. Aside from the foregoing adjustments to NSP's North Dakota revenue requirement, do you have any further recommendations?

A. Yes. It is inappropriate – indeed, unjust – to continue letting the Minnesota dog wag the North Dakota tail. The jurisdictional problems that I have identified earlier in my testimony need to be dealt with on a permanent basis. The solution is to provide for a mechanism whereby the North Dakota commission can review, analyze and rule on NSP's capital programs based on North Dakota -- not Minnesota – statutes, rules, practices and needs.

For this reason, I recommend that NSP be directed to prepare and file with the North Dakota PSC an Integrated Resource Plan ("IRP") that focuses on North Dakota requirements. This plan should be based on the proposition that North Dakota ratepayers pay for programs and expenditures that are required by North Dakota, Minnesota ratepayers pay for the programs that Minnesota requires, and that North Dakota ratepayers

share only those costs that are deemed commonly efficient and prudent for both states.

In addition, NSP should be directed to prepare a North Dakota specific depreciation study that evaluates the production and transmission plant that is consistent with North Dakota statutes and standards. That study should analyze the situs distribution plant that is located in North Dakota. To my knowledge, no such study has ever been prepared.

Q. Does this conclude your testimony?

A. Yes. It does.

Charles W. King

Attachment A

Experience

Snavely King Majoros O'Connor & Lee, Inc. Washington, DC

President (1989 to Present)
Vice President (1970 - 1989)

Mr. King, a founder of the firm and acknowledged authority on regulatory economics, brings over thirty years of experience in economic consulting to his direction of the firm's work in transportation, utility and telecommunications economics.

Mr. King has appeared as an expert witness on over 300 separate occasions before more than thirty state and nine U.S. and Canadian federal regulatory agencies, presenting testimony on rate base calculations, rate of return, rate design, costing methodology, depreciation market forecasting, and ratemaking principles. Mr. King has also testified before House and Senate Committees on energy and telecommunications legislation pending before the U.S. Congress.

In telecommunications, Mr. King has testified before the Federal Communications Commission on a number of policy issues, service authorization, competitive impacts, video dialtone, and prescription of interstate depreciation rates. Before state regulatory bodies, he has presented testimony in proceedings on intrastate rates, costs earnings and depreciation.

Mr. King has testified in electric, gas and water utility cases on virtually every aspect of regulation, including cost of capital, revenue requirements, depreciation, cost allocation and rate design. Mr. King is one of the nation's leading authorities on utility depreciation practices, having testified on this subject in several dozen cases before state regulatory bodies.

In addition to his appearances as a witness in judicial and administrative proceedings, Mr. King has negotiated settlements among private parties and between private parties and regulatory offices. Mr. King also has directed depreciation studies, investment cost benefit analyses, demand forecasts, cost allocation studies and antitrust damage calculations. Mr. King directed analyses of the prices of services under Federal Government's FTS2000 long distance system.

In Canada, Mr. King designed and directed an extended inquiry into the principles and procedures for regulating the telecommunication carriers subject to the jurisdiction of the Canadian Transport Commission. He also was the principal investigator in the Canadian Transport Commission's comprehensive review of rail costing procedures.

EBS Management Consultants, Inc., Washington, DC

Director, Economic Development Department (1968-1970)

Mr. King organized and directed a five-person staff of economists performing research, evaluation, and planning relating to economic development of depressed areas and communities within the U.S. Most of this work was on behalf of federal, state, and municipal agencies responsible for community or regional economic development.

Principal Consultant (1966-1968)

Mr. King conducted research on a broad range of economic topics, including transportation, regional economic development, communications, and physical distribution.

W.B. Saunders & Company, Inc., Washington, DC

Staff Economist (1962-1966)

For this economic consulting firm, which later merged with EBS Management Consultants, Inc., Mr. King engaged in numerous research efforts relating primarily to economic development and transportation.

U.S. Bureau of the Budget, Office of Statistical Standards

Analytical Statistician (1961-1962)

Mr. King was responsible for the review of all federal statistical and data-gathering programs relating to transportation.

Education

Washington & Lee University, B.A. in Economics

The George Washington University, M.A. in Government Economic Policy

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Appearances before State Regulatory Agencies

State	Electric, Gas, Water Utility Cases			Date of Cross-Examination
	Client	Case		
		Case Number	Utility	
AK	Exxon USA	P-89-1,2	Trans Alaska Pipeline System	October 18, 1990
AZ	Arizona Corporation Commission	U-1345-I	Arizona Public Service Co.	December 16, 1980
	Arizona Retailers Association	U-1345-II	Arizona Public Service Co.	January 15, 1981
CA	California Retailers Association	57666	Pacific Gas & Electric Co.	March 6, 1978
	California Retailers Association	57602	Southern California Edison	April 25, 1978
	California Retailers Association	59351	Pacific Gas & Electric Co.	June 12, 1981
	California Retailers & California Manufacturers	59351	Southern California Edison	May 20, 1982
	California Retailers Association	61138	Southern California Edison	May 28, 1982
CO	U. S. Department of Defense	I&S 1100	Colorado Springs (Elec)	June 14, 1977
	J.C. Penney Company	5693	All Electric Utilities	March 8, 1978
	U.S. Department of Defense	I&S 1339	Colorado Springs DPU (Gas)	October 18, 1979
	U. S. Department of Defense	I&S 1540	Colorado Springs DPU (Gas)	February 9, 1982
	U.S. Department of Defense	C. Council	Colorado Springs DPU (Gas)	September 30, 1984
	U.S. Department of Defense	C. Council	Colorado Springs DPU (Elec)	June 6, 1985
	U.S. Department of Defense	C. Council	Colorado Springs DPU (Elec)	May 19, 1986
	U.S. Department of Defense	C. Council	Colorado Springs DPU (Elec)	June 30, 1987
CT	Retailers Merchants Association	72-0204	Various Electric Utilities	July 22, 1976
	Division of Consumer Counsel	76-0604,5	CL&P and HELCO	November 10, 1977
	Public Utilities Control Auto	78-0303	Bridgeport Hydraulic Co.	(none)
	Division of Consumer Counsel	80-0403,4	CL&P and HELCO	August 11, 1980
	Division of Consumer Counsel	81-0413	United Illuminating Company	July 20, 1981
	Division of Consumer Counsel	81-0602,4	CL&P and HELCO	October 5, 1981
	Division of Consumer Counsel	82-0701	CL&P	September 28, 1982
	Coalition of Hotels, Alloys & Retailers	85-10-22	CL&P	(none)
	Coalition of Hotels, Alloys & Retailers	87-07-01	CL&P	April 25, 1988

State	Electric, Gas, Water Utility Cases			Date of Cross-Examination
	Client	Case		
		Case Number	Utility	
DC	D.C. People's Counsel	685	Potomac Electric Power Company	March 6, 1978
	D.C. People's Counsel	715	Potomac Electric Power Company	(none)
	D.C. People's Counsel	725	Potomac Electric Power Company	April 4, 1980
	D.C. People's Counsel	737	Potomac Electric Power Company	January 1, 1981
	Washington Metro Area Transit Authority	748	Potomac Electric Power Company	June 26, 1981
	Washington Metro Area Transit Authority	758	Potomac Electric Power Company	December 15, 1981
	D.C. People's Counsel	785	Potomac Electric Power Company	September 21, 1982
	Washington Metro Area Transit Authority	759	Potomac Electric Power Company	March 29, 1984
	D.C. People's Counsel	685 Remand	Potomac Electric Power Company	June 10, 1985
	D.C. People's Counsel	905	Potomac Electric Power Company	August 20, 1991
	D.C. People's Counsel	912	Potomac Electric Power Company	May 7, 1992
	D.C. People's Counsel	834, III	Potomac Electric Power Company	May 22, 1992
	D.C. People's Counsel	917	Potomac Electric Power Company	September 24, 1992
	D.C. People's Counsel	922	Washington Gas Light Company	June 15, 1993
	D.C. People's Counsel	929	Potomac Electric Power Company	December 16, 1993
	D.C. People's Counsel	934	Washington Gas Light Company	Filed April 22, 1994
	D.C. People's Counsel	939	Potomac Electric Power Company	March 16, 1995
	D.C. People's Counsel	917	Potomac Electric Power Company	April 16, 1995
	D.C. People's Counsel	951	Potomac Electric Power Company	February 20, 1997
	D.C. People's Counsel	945	Potomac Electric Power Company	September 29, 1999
	D.C. People's Counsel	847	Washington Gas Light Company	June 27, 2001
	D.C. People's Counsel	989	Washington Gas Light Company	May 22, 2002
	D.C. People's Counsel	1016	Washington Gas Light Company	September 23, 2003
	D.C. People's Counsel	1053	Potomac Electric Power Company	June 27, 2007
DE	Delaware PSC Staff	94-164	Artesian Water Company	Filed March 10, 1995
	Delaware PSC Staff	94-149	Wilmington Suburban Water Company	March 10, 1995
	Delaware PSC Staff	04-152	Tidewater Utilities Company	Filed July 26, 2004
FL	Florida Retail Federation	790593-EU	All Electric Utilities	March 5, 1981
	Florida Retail Federation	810002-EU	Florida Power and Light Company	July 23, 1981
	Florida Retail Federation	820097-EU	Florida Power and Light Company	September 22, 1982
	Florida Retail Federation	820097-EU	Florida Power and Light Company	April 11, 1983
	Florida Retail Federation	830012-EU	Tampa Electric Company	August 19, 1983
	Florida Retail Federation	830465-EI	Florida Power and Light Company	April 19, 1984
	Florida Retail Federation	830465-EI	Tampa Electric Company	(none)

State	Electric, Gas, Water Utility Cases			Date of Cross-Examination
	Client	Case		
		Case Number	Utility	
GA	Georgia Retail Federation	3270-U	Georgia Power Company	September 3, 1981
	Georgia Public Service Commission	4007-U	Georgia Power Company	August 21, 1991
	Georgia Public Service Commission	4384-U	All Electric Utilities	August 1, 1993
	Georgia Public Service Commission	4755-U	Georgia Power Company	January 25, 1994
	Georgia Public Service Commission	4697-U	All Utilities	May 10, 1994
	Georgia Public Service Commission	9355-U	Georgia Power Company	November 4, 1998
	Georgia Public Service Commission	14000-U	Georgia Power Company	October 23, 2001
	Georgia Public Service Commission	14618-U	Savannah Electric & Power Company	March 27, 2002
	Georgia Public Service Commission	14311-U	Atlanta Gas Light Company	April 8, 2002
	Georgia Public Service Commission	17066-U	Georgia Power Company	July 31, 2003
	Georgia Public Service Commission	18300-U	Georgia Power Company	October 26, 2004
	Georgia Public Service Commission	18638-U	Atlanta Gas Light Company	March 14, 2005
	Georgia Public Service Commission	19758-U	Savannah Electric & Power Company	March 29, 2005
	Georgia Public Service Commission	20298-U	Atmos Energy Corp.	October 11, 2005
	Georgia Public Service Commission	25060-U	Georgia Power Company	Filed October 22, 2007
HI	Public Utilities Department	2793	All Electric Utilities	February 14, 1978
	Hawaii Consumer Advocate	4536	Hawaiian Electric Company	February 1, 1983
IL	Illinois Retail Merchants Association ("IRMA"/ Chicago Bldg. Mgrs. Association ("CBMA")	76-0698	Commonwealth Edison	June 22, 1977
	IRMA/CBMA	76-0568	All Electric Utilities	(none)
	IRMA/CBMA	80-0546	Commonwealth Edison	March 5, 1981
	IRMA/CBMA	82-0026	Commonwealth Edison	July 22, 1982
	IRMA/CBMA	83-0537	Commonwealth Edison	March 19, 1984
	IRMA/CBMA	87-0427	Commonwealth Edison	March/April 22, 1988
	IRMA/CBMA	90-0169	Commonwealth Edison	October 29, 1990
	City of O'Fallon, IL	02-0690	Illinois-American Water Company	Filed Feb.5, Apr.11,2003
IN	Indiana Retail Council	35780-S2	N. Ind. Public Service co.	June 1, 1980
	Indiana Retail Council	35780-S1	Public Service of Indiana	October 15, 1980
	Indiana Retail Council	36318	Public Service of Indiana	May 4, 1982
KS	J.C. Penney Company	115,379-U	All Kansas Utilities	January 22, 1981
KY	Seven Kentucky Retailers	7310	Louisville Gas & Electric Co.	April 25, 1979
	Attorney General of Kentucky	2002-145	Columbia Gas of Kentucky	Filed August 8, 2002
	Attorney General of Kentucky	2003-252	Union Heat Light & Power Co.	September 30, 2003
	Attorney General of Kentucky	2004-67	Delta Gas Company	August 18, 2004
	Attorney General of Kentucky	2006-00646	Atmos Energy Corp.	Filed April 27, 2007
	Attorney General of Kentucky	2007-00008	Columbia Gas of Kentucky	Filed June 12, 2007
	Attorney General of Kentucky	2007-00089	Delta Gas Company	Filed August 14, 2007

State	Electric, Gas, Water Utility Cases			Date of Cross-Examination
	Client	Case		
		Case Number	Utility	
MA	Coalition of Municipalities	20279	Western Massachusetts Electric	March 19, 1980
	Coalition of Municipalities	557/558	Western Massachusetts Electric	May 14, 1981
	Coalition of Municipalities	957	Western Massachusetts Electric	March 9, 1982
	Coalition of Municipalities	1300	Western Massachusetts Electric	January 1, 1983
	Coalition of Municipalities	85-270	Western Massachusetts Electric	March 26, 1986
MD	Maryland People's Counsel	6977	Washington Gas & Light Company	September 17, 1976
	Maryland People's Counsel	6814	Potomac Electric Power Company	
	Maryland People's Counsel	6807	All Electric Utilities	September 1, 1977
	Maryland People's Counsel	6882	Baltimore Gas & Electric Company	(none)
	Maryland People's Counsel	6985	Baltimore Gas & Electric Company	September 28, 1976
	Maryland People's Counsel	7070	Baltimore Gas & Electric Company	December 20, 1976
	Maryland People's Counsel	7149	Potomac Electric Power Company	April 18, 1978
	Maryland People's Counsel	7163	All Electric Utilities	January 17, 1979
	Maryland People's Counsel	7236	Delmarva Power & Light Company	October 23, 1978
	Retail Merchants of Baltimore	7397	Baltimore Gas & Electric Company	June 20, 1980
	Maryland People's Counsel	7427	Delmarva Power & Light Company	September 8, 1980
	Maryland People's Counsel	7574	Baltimore Gas & Electric Company	December 2, 1981
	Maryland People's Counsel	7597	Potomac Electric Power Company	February 18, 1982
	Organization of Consumer Justice	7604	Potomac Electric Power Company	April 20, 1982
	Maryland People's Counsel	7588	Baltimore Gas & Electric Company	October 19, 1982
	Maryland People's Counsel	7663	Potomac Electric Power Company	November 22, 1982
	Retail Merchants of Baltimore	7685	Baltimore Gas & Electric Company	April 12, 1983
	Genstar Stone Products, et al.	7878	Potomac Electric Power Company	December 9, 1985
	Industrial Intervenors	7878	Potomac Electric Power Company	June 28/July 1986
	Maryland People's Counsel	7983	Baltimore Gas & Electric Company	March 4, 1987
	Giant Foods, Inc.	8855	Baltimore Gas & Electric Company	January 8, 2003
	Maryland People's Counsel	9036	Baltimore Gas & Electric Company	September 29, 2005
	Maryland People's Counsel	9092	Potomac Electric Power Company	April 16, 2007
	Maryland People's Counsel	9093	Delmarva Power & Light Company	April 9, 2007
	Maryland People's Counsel	9104	Washington Gas & Light Company	August 23, 2007
	Maryland People's Counsel	9096	Baltimore Gas & Electric Company	September 24, 2007
	Maryland People's Counsel	9103	Washington Gas & Light Company	filed December 21, 2007
MI	General Services Administration	U-10102	Detroit Edison Company	March 22, 1993
	Michigan Attorney General	U-11722	Detroit Edison Company	November 6, 1998
	Michigan Attorney General	U-11772	Consumers Energy/Detroit Edison	November 16, 1998
	Michigan Attorney General	U-11495	Detroit Edison Company	December 8, 1999
	Michigan Attorney General	U-11956	Consumer Energy/Detroit Edison	December 15, 1999
	Michigan Attorney General	U-12505	Consumers Energy Company	September 7, 2000
	Michigan Attorney General	U-12478	Detroit Edison Company	October 5, 2000
	Michigan Attorney General	U-12639	Consumers Energy/Detroit Edison	July 18, 2001
	Michigan Attorney General	U-13000	Consumers Energy Company	January 29,2002
	Michigan Attorney General	U-13380	Consumers Energy Company	September 9, 2002
	Michigan Attorney General	U-13715	Consumers Energy Company	April 24, 2003
	Michigan Attorney General	U-13808	Detroit Edison Company	Dec 12, 2003; Jan 30, Mar 5, 04

State	Electric, Gas, Water Utility Cases			Date of Cross-Examination
	Client	Case		
		Case Number	Utility	
MI (Cont'd)	Michigan Attorney General	U-12999	Consumers Energy Company	March 10, 2004
	Michigan Attorney General	U-13898,9	Michigan Consolidated Gas Co.	August 23, 2004
	Michigan Attorney General	U-14201	Detroit Edison Company	Filed December 5, 2004'
	Michigan Attorney General	U-14274	Consumers Energy Company	Filed February 15, 2005
	Michigan Attorney General	U-14148	Consumers Energy Company	Filed March 2, 25, 2005
	Michigan Attorney General	U-14399	Detroit Edison Company	July 29, 2005
	Michigan Attorney General	U-14428	Detroit Edison Company	September 7, 2005
	Michigan Attorney General	U-14292	All Michigan Utilities	September 27, 2005
	Michigan Attorney General	U-13808-R	Detroit Edison Company	November 7, 2005
	Michigan Attorney General	U-14547	Consumers Energy Company	Nov.7, 2005; Mar. 22, 2006
	Michigan Attorney General	U-14701	Consumers Energy Company	March 21, 2006
	Michigan Attorney General	U-14526	Consumers Energy Company	April 11.2006
	Michigan Attorney General	U-14561	All Gas Distribution Utilities	June 1, 2006
	Michigan Attorney General	U-15002	Detroit Edison Company	December 8, 2006
	Michigan Attorney General	U-15245	Consumers Energy Company	December 11, 2007
MN	Minnesota Retail Federation	EOO2/6R-77-611	Northern States Power	1979
MO	Missouri Retailers Association	EO-78-161	Kansas City Power & Light Company	February 19, 1981
	Missouri Public Counsel	ER-2006-0315	Empire District Electric Company	September 14, 2006
	Missouri Public Counsel	GR-2007-0003	Ameren UE (Gas)	Filed December 15, 2006
	Missouri Public Counsel	ER-2007-0002	Ameren UE (Electric)	March 22, 2007
NC	North Carolina Merchants Association	E-100	All Electric Utilities	December 18, 1975
ND	North Dakota Public Service Commission	PU-400-00-521	Xcel Energy, Inc.	April 20, 2001
	North Dakota Public Service Commission	PU-399-01-186	Montana-Dakota Utilities (Electric)	February 25, 2002
	North Dakota Public Service Commission	PU-399-02-183	Montana-Dakota Utilities (Gas)	October 7, 2002
	North Dakota Public Service Commission	PU-399-02-183	Montana-Dakota Utilities (Gas Depr.)	Filed April 7, 2003
	North Dakota Public Service Commission	PU-399-03-296	Montana-Dakota Utilities (Electric)	Filed October 15, 2003
	North Dakota Public Service Commission	PU-04-97	Montana-Dakota Utilities (Gas)	Filed July 6, 2004
	North Dakota Public Service Commission	PU-06-525	Northern States Power (Gas)	Filed May 1, 2007
NH	Business & Industry Association of N.H.	79-187-II	Public Service of N.H.	February 6, 1981
	Business & Industry Association of N.H.	80-260	Public Service of N.H.	February 5, 1981
	Business & Industry Association of N.H.	82-333	Public Service of N.H.	November 2, 1983
NJ	N.J. Retail Merchants Association	803-151	All New Jersey Utilities	March 31, 1981
	Department of Public Advocate	815-459	N.J. Natural Gas Company	(none)
	Resorts International Hotel, Inc.	8011-827	Atlantic City Sewerage Co.	(none)
	Dept. of Public Advocate	822-116	Atlantic City Electric Co.	August 11, 1982
	Dept. of Public Advocate	355-87	Elizabethtown Gas	June 9, 1987
	Dover Township Fire Chiefs	88-080967	Tom's River Water Company	February 22, 1989

CHARLES W. KING
Appearances before State Regulatory Agencies

State	Electric, Gas, Water Utility Cases			Date of Cross-Examination
	Client	Case		
		Case Number	Utility	
NY	N.Y. Council of Retail Merchants Metropolitan N.Y. Retail Council Metropolitan N.Y. Retail Council N.Y. Metro. Transit Authority	26806 27029 27136 27353	All Electric Utilities Consolidated Edison Company Long Island Lighting Company Consolidated Edison Company	February 3, 1976 (none) July 1, 1977 September 5, 1980
OH	Ohio Council of Retail Association Ohio Council of Retail Association	88-170-EL 83-1529-EL	Cleveland Elec. Illuminating Cincinnati Gas & Electric	(none) February 15, 1992
PA	Pennsylvania Retail Association Southeastern Pa. Transp. Authority Eastern Penn Energy Users Group Eastern Penn Energy Association Penn Business Utility User Group Pennsylvania Office of Consumer Advocate	76-PRMD-7 R-811626 R-822169 R-842651 R-850152 R-00016339	All Electric Utilities Philadelphia Electric Company Penn. Power & Light Company Penn. Power & Light Company Philadelphia Electric Company Pennsylvania-American Water Co.	September 7, 1977 December 11, 1981 March/April 1983 December 3, 1984 February 19, 1986 September 19, 2001
TN	Attorney General of Tennessee	07-00105	Atmos Energy Corp.	Filed August 21, 2007
TX	Houston Retailers Association Houston Retailers Association Cities for Fair Utility Rates	5779 6765 8425/8431	Houston Lighting Company Houston Lighting Company Houston Lighting Company	October 19, 1984 September 25, 1986 April 25, 1989
UT	Div. Of Public Utilities Dept of Commerce Div. Of Public Utilities Dept of Commerce Div. Of Public Utilities Dept of Commerce	98-2035-33 05-057-T01 07-035-13	Pacific Corp Questar Gas Company Rocky Mountain Power Co.	Filed August 16, Sept 22, 1999 May 17, 2006 Filed October 15, 2007
VA	Consumer Congress of Virginia Consumer Congress of Virginia Va. Business Committee on Energy Virginia Pipe Trades Council	19426 19960 PUE 7900012 PUE 8900051	Virginia Electric Power Company Virginia Electric Power Company Virginia Electric Power Company Old Dominion Electric Corp. &	July 1, 1975 September 19, 1978 February 25, 1981 October 31, 1989
WI	Wisconsin Merchants Federation	6630-ER-2	Wisconsin Electric Power Company	May 15, 1978

State	Telecommunications Cases			Date of Cross-Examination
	Client	Case		
		Case Number	Utility	
AL	U.S. Department of Defense	24472	All Telephone Companies	June 14, 1995
AK	GCI Communications, Inc. GCI Communications, Inc.	U-97-82,U-97-143 U-05-46	Alaska Communications Systems Matanuska Telephone Association	Filed Feb 25, April 5, 2004 October 28, 2005
AZ	Arizona Burglar & Fire Alarm Association Federal Executive Agencies U.S. Department of Defense	9981-E- 1051-80-64 E-1051-88-146 T-01051B-99-0105	Mountain State Telephone Mountain State Telephone US WEST Communications	(none) (none) Filed July 26, Sept 8, 2000
CA	Western Burglar & Fire Alarm Association Western Burglar & Fire Alarm Association Western Burglar & Fire Alarm Association Western Burglar & Fire Alarm Association Western Burglar & Fire Alarm Association Western Burglar & Fire Alarm Association Western Burglar & Fire Alarm Association Western Burglar & Fire Alarm Association California Cellular Resellers Federal Executive Agencies California Cellular Resellers Cellular Services, Inc. Federal Executive Agencies	59849 5984cont. A83-01-22 A83-02-02 A82-11-07 A85-01-034 A87-01-02 A88-07-17019 A.88-11-1040 1.87-11-033 1.88-11-040 1.88-11-040 A92-05-004	Pacific Telephone & Telegraph Pacific Telephone & Telegraph Pacific Telephone & Telegraph General Telephone of California Pacific Telephone & Telegraph Pacific Telephone & Telegraph General Telephone of California Pac. Bell Tel. & GTE of CA. All Cellular Carriers All Telephone Companies All Cellular Carriers All Cellular Carriers Pacific Telephone & Telegraph	March 25, 1981 June 23, 1982 June 29, 1983 January 17, 1984 Jan. 18, Oct. 31, Nov 28, 1984 June 4, 1985, October 2, 1986 October 22, 1987 January 23, 1989 August 11, 1989 March 6-7, 1991 August 19, 1991 October 3, 1991 June 9, 1993
CO	U.S. Department of Defense U.S. Department of Defense U.S. Department of Defense U.S. Department of Defense Colorado Municipal League U.S. Department of Defense U.S. Department of Defense U.S. Department of Defense U.S. Department of Defense U.S. Department of Defense U.S. Department of Defense AT&T	I&S 717 I&S 1700 Appl. I&S 1766 Appl 36883 I&S 891-O82T 905-544T 90A-665T 92M-039T 92S-229T 90A-665T 96S-331T	Mountain Bell Telephone Company Mountain Bell Telephone Company Mountain Bell Telephone Company Mountain Bell Telephone Company Mountain Bell Telephone Company U.S. West Communications U.S. West Communications U.S. West Communications U.S. West Communications U.S. West Communications U.S. West Communications U.S. West Communications	1972 (none) September 18, 1986 November 28, 1988 December 13, 1988 February 21, 1990 July 17, 1991 October 23, 1991 February 24-24, 1992 July 30-31, 1992 November 6, 1996 April 17, 1997

State	Telecommunications Cases			Date of Cross-Examination
	Client	Case		
		Case Number	Utility	
CT	Connecticut Consumer Counsel	770526	Southern New England Telephone Co.	November 10, 1977
	CT Cellular Resellers Assn.	89-12-05	Southern New England Telephone Co.	(none)
	CT Cellular Resellers Coalition	94-03-27	Springwich Cellular/Bell Atlantic	May 16, June, 1994
	AT&T	AT&T/SNET Arbitration	Southern New England Telephone Co.	Filed October 28, 1996
	Connecticut Consumer Counsel	96-04-07	Southern New England Telephone Co.	February 10,1998
	Connecticut Consumer Counsel	00-07-17	Southern New England Telephone Co.	December 5, 2000
DC	D.C. People's Counsel	729	Chesapeake & Potomac Tel. Co.	May 13, 1980
	D.C. People's Counsel	798	Chesapeake & Potomac Tel. Co.	July 18, 1983
	General Services Administration	827	Chesapeake & Potomac Tel. Co.	May 7, 1985
	General Services Administration	854	Chesapeake & Potomac Tel. Co.	April 16, 1987
	General Services Administration	850	Chesapeake & Potomac Tel. Co.	October 7, 1991
	General Services Administration	926	Chesapeake & Potomac Tel. Co.	October 7, 1993
DE	Public Service Commission	Depr.Repre	Diamond State Telephone Co.	April 1, 1985
	Federal Executive Agencies	86-20	Diamond State Telephone Co.	July 31, 1987
	Public Service Commission	Depr.Repre	Diamond State Telephone Co.	March 8, 1988
FL	GTE Sprint Communications Company	720536-TP	All Telephone Companies	September 12, 1983
	Office of Public Counsel	Depr.Repre	Southern Bell	July 30, 1986
	Federal Executive Agencies	880069-TL	Southern Bell	July 21, 1988
	Federal Executive Agencies	880069-TL	Southern Bell	November 30, 1990
	Federal Executive Agencies	880069-TL	Southern Bell	February 11, 1992
GA	Georgia Attorney General	3893-U	Southern Bell Telephone Co.	January 8, 1990
	Federal Executive Agencies	3905-U	Southern Bell Telephone Co.	June 12, 1990
	Federal Executive Agencies	3987-U	Southern Bell Telephone Co.	February 13, 1992
	Georgia Public Service Commission	4018-U	Southern Bell Telephone Co.	Jan 14, Feb 10, 1993
HI	Hawaii Public Utility Commission	1871	Hawaiian Telephone Company	July 8, 1971
	Four Hawaii Counties	4588	Hawaiian Telephone Company	December 15, 1983
	Department of Defense	7579	Hawaiian Telephone Company	April 26, 1994
	Department of Defense	94-0093	Oceanic Communications	March 13, 1995
	Department of Defense	7702	All Communications Carriers	June 2, 1995
	Department of Defense	94-0298	GTE Hawaiian Telephone Company	May 7, 1996
	Department of Defense	7720	Verizon-Hawaii	November 15, 2000

State	Telecommunications Cases			
	Client	Case		Date of Cross-Examination
		Case Number	Utility	
ID	U.S. Department of Energy U.S. Department of Energy	U-1000-63 U-1000-70	Mountain Bell Telephone Co. Mountain Bell Telephone Co.	May 16, 1983 March 6, 1984
IL	Illinois Alarm Companies Attorney General of Illinois GTE Sprint Communications Co. Federal Executive Agencies	79-0143 81-0478 83-0142 89-0033	Illinois Bell Telephone Illinois Bell Telephone All Telephone Companies Illinois Bell Telephone	September 26, 1979 December 28, 1981 August 4, 1983 June 12, 1989
KS	State Corporation Commission Federal Executive Agencies Federal Executive Agencies	Depr. Repr. 166.856-U 190, 492	Southwestern Bell Southwestern Bell All Telephone Companies	May 12-14, 1986 November 7, 1989 November 4, 1994
KY	Kentucky Cable Telecommunications Assn. Kentucky Cable Telecommunications Assn.	2000-414 2000-39	Blue Grass Energy Cooperative Cumberland Valley Electric, Inc.	January 11, 2001 January 11, 2001
MD	Maryland People's Counsel Maryland People's Counsel Maryland People's Counsel Maryland People's Counsel Federal Executive Agencies Federal Executive Agencies Federal Executive Agencies	6813 6881 7025 7467 7851 8106 8274	C&P Telephone Company C&P Telephone Company C&P Telephone Company C&P Telephone Company C&P Telephone Company C&P Telephone Company C&P Telephone Company	1975 December 17, 1975 March 15, 1975 October 20, 1981 March 20, 1985 May 9, 1988 August 2, 1990
MI	Michigan Attorney General Michigan Attorney General	U-8911 U-9553	Michigan Bell Telephone Co. AT&T Communications/MCI	November 7, 1988 December 4, 1990
MN	GTE Sprint Communications Co. U.S. Department of Defense	83-102-HC 87-021-BC	All Telephone Companies Northwest Bell Telephone Co.	August 5, 1983 (none)

State	Telecommunications Cases			Date of Cross-Examination
	Client	Case		
		Case Number	Utility	
MO	GTE Sprint Communications Co. Federal Executive Agencies Federal Executive Agencies	TR83-253 TC-89-14 TO-89-56	Southwestern Bell Tel. Co. Southwestern Bell Tel. Co. Southwestern Bell Tel. Co.	September 5, 1983 (none) November 7, 1990
MS	Federal Executive Agencies	U-5453	South Central Bell Tel. Co.	May 15, 1990
NJ	Department of Public Advocate Department of Public Advocate Department of Public Advocate Department of Public Advocate Department of Public Advocate Department of Public Advocate	Depr.Repr. 815-458 Depr.Repr. Depr.Repr. T092030358 TMO05080739	N.J. Bell Telephone Company N.J. Bell Telephone Company N.J. Bell Telephone Company N.J. Bell Telephone Company N.J. Bell Telephone Company United Telephone Co. of New Jersey	Mar-79 October 15, 1981 March 1, 1982 February 1, 1985 September 30, 1992 January 5,2006
NM	New Mexico Corporation Commission New Mexico Corporation Commission	1032 86-151-TC	Mountain Bell Telephone Co. General Telephone of Southwest	November 14, 1983 February 5, 1987
NV	Prime Cable of Las Vegas Prime Cable of Las Vegas	95-8034/8035 96-9035	Central Telephone - NV Sprint/Centel, Nevada Bell	Filed November 22, 1995 June 2, 1997
NY	Holmes Protection, Inc. Holmes Protection, Inc. 5 Alarm Companies GTE Sprint Communications Co.	27350 27469 27710 28425	New York Telephone Company New York Telephone Company New York Telephone Company All Telephone Companies	October 17, 1978 May 17, 1979 July 24, 1980 July 8, 1983
PA	City of Philadelphia	R-832316	Pennsylvania Bell Telephone	September 20, 1983
SC	Office of Consumer Advocate Office of Consumer Advocate Office of Consumer Advocate Office of Consumer Advocate Office of Consumer Advocate	Depr.Repr. 86-511-C 86-541-C Depr.Repr. 89-180-C	Southern Bell Southern Bell General Telephone of South Southern Bell ALLTEL of South Carolina	July 1, 1986 December 11, 1986 April 8, 1987 July 10, 1989 September 26, 1989

CHARLES W. KING
Appearances before State Regulatory Agencies

State	Telecommunications Cases			Date of Cross-Examination
	Client	Case		
		Case Number	Utility	
TX	U.S. Department of Defense	8585/8218	Southwestern Bell Telephone Co.	(none)
VA	U.S. Dept. Of Defense, GSA, et Federal Executive Agencies	19696 PUC 890014	C&P Telephone Company All Telephone Companies	October 6, 1976 February 13, 1989
VI	V.I. Department of Commerce V.I. Public Service Commission	205 341	Virgin Islands Telephone Co. Virgin Islands Telephone Co.	April 29, 1980 March 20, 1991
WA	U.S. Department of Defense U.S. Department of Defense U.S. Department of Defense U.S. Department of Defense WA Attorney General/TRACER U.S. Department of Defense U.S. Department of Defense WA Attorney General/TRACER WA Attorney General/TRACER U.S. Department of Defense WA Attorney General/WeBTEC/AARP WA Attorney General WA Attorney General	U-72-39 U-87-796-T U-88-20524 U-89-2698-F UT-940641 UT-941464 UT-951425 UT-961632 UT-021120 UT-040788 UT-040520 UT-050814	Pacific Northwest Bell Pacific Northwest Bell Pacific Northwest Bell US West Communications US West Communications US West Communications US West Communications US West Communications GTE Northwest, Inc Qwest Communications Verizon Northwest, Inc. Verizon Northwest, Inc. Verizon - MCI Merger	1973 December 20, 1983 November 8, 1988 November 28, 1989 Filed October 14, 1994 June 22, 1995 January 22, 1996 Filed June 23, 1997 July 29, 1997 May 22, 2003 August 12, 2004 February 2, 2005 November 2, 2005
WI	GTE Sprint Wisconsin Consumers Utility Board Wisconsin Consumers Utility Board	6720-TR-38 2055-TR-102 5846-TR-102	All Telephone Companies CenturyTel of Central Wisconsin Telephone USA, LCC	October 20, 1983 June 26, 2002 June 26, 2002

Client	Docket	Subject	Date of Cross-Examination
Federal Communications Commission			
Department of Defense	16020	Consat Rate of Return	1973
Airline Parties	16258	Bell System Rates	July 22, 1968
Airline Parties	18128	TELPAK	3/22, 10/15 1971, Feb. 22, 1972
National Data Corporation	19989	WATS	(none)
Press Wire Services	19919	Private Line Rates	(none)
Aeronautical Radio	20814	Private Line Rates	October 5, 1978
Department of Defense	20690	1,544 Mbps Service	January 30, 1979
State of Hawaii	21263	Interstate Separation	February 7, 1979
International Record Carriers	CC78-97	Telex/TWX Rates	March 6, 1980
ITT World Communications	CC84-633	Rate of Return	(none)
Aeronautical Radio	CC78-72	Access Line Charges	(none)
MCI	CC84-800	Rate of Return	(none)
Ind. Data Com. Mfg. Assn.	CC85-26	AT&T Accounting Plan	(none)
Tymnet, Inc.	ENF84-22	Packet Switching Costs	(none)
Adelphia Jones Intercable, et. al.	Bell Atlantic	Video Dialtone	Filed 7/29/94
Adelphia Jones Intercable, et. al.	Bell Atlantic	Video Dialtone	Filed 8/23/94
Adelphia Jones Intercable, et. al.	Bell Atlantic	Video Dialtone	Filed 2/21/95
Nuclear Regulatory Commission			
Fauquier League for Environment Protection	50-328 50-329	Va. Electric Power Co.	1976
Postal Rate Commission			
Association of Third Class Mail Users	R71-1	Rates	1970
Dow Jones & Company	R72-1	Rates	1972
Dow Jones & Company	R74-1	Rates	September 13, 1974
Dow Jones & Company	MC76-2	Rate Structure	January 6, 1979
Dow Jones & Company	MC79-3	Rate Structure	September 12, 1979
Dow Jones & Company	R80-1	Rates	November 25, 1980
Warshawsky & Company	C82-1	Rate Structure	(none)
Dow Jones & Company	R84-1	Postal Costs	June 14, 1984
Dow Jones & Company	R87-1	Rate Structure Costs	November 2, 1987
Dow Jones & Company	R90-1	Rate Structure Costs	Sept 12, Oct 10, 1990
Dow Jones & Company	MC91-1	Pre-barcoding Discounts	November 19, 1991
Dow Jones & Company	MC91-3	Palletization Discounts	March 2, 1992

CHARLES W. KING
Appearances before Federal Regulatory Agencies

Client	Docket	Subject	Date of Cross-Examination
U.S. Congress			
National Retail Merchants Association	House/Senate Hearings	Electric Rate Reform Legislation	1976, 1977 & 1979
National Wireless Resellers Association	House Commerce Committee	Interconnection & Resale of Wireless Services	October 12, 1995
Federal Maritime Commission			
State of Hawaii	71-18	Ocean Shipping Rates	October-71
Foss Alaska Line	79-54	Barge Rate Increase	July 1979
Palmetto Shipping and Stevadoring	85-20	Vessel Charge Liability	October 27, 1986
Interstate Commerce Commission - Surface Transportation Board			
Western Coal Traffic League	Ex Parte 349	R.R. Rate Increase	May-76
Western Coal Traffic League	Ex Parte 357	R.R. Rate Increase	Oct-78
Western Coal Traffic League	Ex Parte 375 (Sub1)	R.R. Rate Increase	June 1, 1980
Arkansas Power & Light Co.	37276	Cost of Capital	(none)
Central Illinois Light Co.	37450	Cost of Capital	March 10, 1981
Western Coal Traffic League	Ex Parte 347	Costing Methods	(none)
Snavely King Majoros O'Connor & Lee, Inc.	Ex Parte 664	Cost of Capital	December 8, 2006
Civil Aeronautics Board			
Thomas Cook, Inc.	36595	Air Fare Deregulation	(none)
Copyright Royalty Tribunal			
Public Broadcasting Service	88-2-86CD	Television Valuation	(none)
Federal Energy Regulatory Commission			
Exxon USA	OR89-2-000	Pipeline Quality Bank	October 18, 1990
Canadian Transport Commission			
Rail Costing Inquiry, 1967-1969 Telecommunications Costing Inquiry, 1972-1975			
Surface Transportation Board			
Williams Energy Services, Inc	Ex Parte 582, Sub 1	Rail Merger Guidelines	April 5, 2001

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☐ **Public Document – Trade Secret Data Excised**
☒ **Public Document**

Xcel Energy
Case No.: PU-07-776
Response To: North Dakota Public Service Commission
Information Request No. 7-1
Requester: Michael Diller
Date Received: April 17, 2008

Question:

Please refer to your response to Staff DR No. 3-26:

a. Please provide a comparison between the Federal environmental standards under the "new source review" requirements of EPA with (1) the corresponding Minnesota environmental standards and (2) the level of environmental compliance in the King plant.

b. Please provide your best estimate of the proportion of the 43.87 percent environmental costs that would have been required had the King plant been rehabilitated to meet only the EPA new source review standards.

Response:

a. Federal environmental standards under new source review are air emission limits that are based on a case-by-case determination of what is considered best available control technology ("BACT") for a specific emissions unit. The King rehabilitation project did not need to follow these new source review requirements because the project resulted in a net reduction of emissions. In order for this project to be a qualifying project under the Minnesota Emissions Reduction Rider statute (Minn. Stat. § 216B.1692), the MPCA concluded that the emission limits documented in the permit are "comparable to BACT," essentially meeting the same emission limit requirements of new source review. The following chart compares the new source review limits to the Minnesota environmental standards:

	Federal Standard (Limits Deemed Comparable to BACT for King Plant)	Minnesota Standard
Total Particulate Matter	0.015 lb/mmBtu	0.4 lb/mmBtu
Opacity	20%	20%
Sulfur Dioxide (SO_2)	0.12 lb/mmBtu (30-day rolling average)	(a) 3.0 lb/mmBtu (one-hour average) (b) 1.6 lb/mmBtu (annual average)
Oxides of Nitrogen (NOx)	0.10 lb/mmBtu (30-day rolling average)	None
Particulate Matter less than 10 Microns (PM_{10})	0.030 lb/mmBtu	None

The NOx control equipment needed to comply with the permit limit also enables the King plant to comply with the federal Clean Air Interstate Rule without needing to purchase any NOx allowances.

b. All of the 43.87 percent environmental costs would have been required had the King plant been rehabilitated to meet new source review standards.

Witness: Kent Larson
Preparer: Nancy C. Glass
Title: Environmental Analyst V
Department: Environmental Services
Telephone: 612-330-5520
Date: May 2, 2008

CHAPTER 8

ALTERNATE PROPOSAL

If the parties are unable to reach agreement on the desirability of the Proposed Plan and an appropriate cost recovery mechanism for our Proposal, then Xcel Energy is prepared to sponsor the following Alternative Plan for consideration and approval. While we believe these projects are not the optimal projects from an environmental, system, or customer perspective, this Alternative Plan also offers significant environmental benefits envisioned by the Statute.

I. DESCRIPTION OF ALTERNATIVE PROJECTS

The Alternative Plan proposes to keep all three facilities using coal as their primary fuel. Each project within this Alternative Plan calls for installation of significant environmental controls to reduce coal-related emissions. While this Alternative Plan does not achieve the same levels of emissions reductions as the Proposed Plan, the reductions are significant and the costs are less.

A. Alternative Proposal For King

The Company believes that the AQCS project with sequential rehabilitation of the plant is the clear first choice for our most productive and efficient metro site. As a result, whether Xcel Energy proceeds with the Proposed Plan or the Alternative Plan, we believe this project should be the same. Because under this scenario Strategist derives slightly different capacity factors for King, the emissions reductions are slightly different in this scenario, as set forth on Table 8-1 below.

TABLE 8-1
KING ALTERNATIVE PROPOSAL EMISSIONS RATE REDUCTIONS
BEFORE AND AFTER PROJECT INSTALLATION

	SO_2 Tons/yr	NO_x Tons/yr	CO_2 Tons/yr	CO Tons/yr	PM Tons/yr	Hg Lbs/yr
"Before"	26,141	18,744	3,499,702	439	451	58
"After"	2,394	1,995	3,970,072	541	359	46.4

B. Alternative Proposal for High Bridge

By installing environmental control equipment at High Bridge, Xcel Energy can achieve emissions reductions at lower cost than the proposed natural gas conversion project. This proposal would include the addition of combustion controls (over fire air systems and low NO_x that will reduce NO_x emissions, a fabric filter for particular control and a dry scrubber to reduce SO_2. A more complete description of the scope of this project is contained in Attachment 8-1.

This project has an estimated capital cost of about $70 million in 2001 dollars. It also achieves significant environmental benefits. These capital costs would not be invested without incurring some additional capital costs to extend the life of the facility for approximately 15 years. Table 8-2 summarizes the emissions reductions made possible by this project.

TABLE 8-2
SUMMARY INFORMATION FOR HIGH BRIDGE ALTERNATIVE PROPOSAL

Projected Book Life	15 Years	
Capacity	238.6 MW	4.4 MW Decrease
Capital Cost (in 2001$)	$71 million (without rehabilitative costs)	
Air Emissions Reductions	77% SO_2, 65% NO_x, 12% PM; 20% Mercury	

The comparative "before" and "after" review of emissions under this alternative project at High Bridge is set forth below in Table 8-3.

TABLE 8-3
HIGH BRIDGE ALTERNATE PROPOSAL EMISSIONS RATE REDUCTIONS
BEFORE AND AFTER PROJECT INSTALLATION

	SO_2 Tons/yr	NO_x Tons/yr	CO_2 Tons/yr	CO Tons /yr	PM Tons/yr	Hg Lbs/yr
"Before"	3,144	4,526	1,544,868	199	97	63
"After"	729	1,581	1,209,693	456	109	50.4

C. Alternative Proposal for Riverside

This alternative proposal at this plant is to install air quality control systems on both Units 7 and 8. The key control devices include fabric filters for particulate control, dry scrubbers for SO_2 control, and an over fire air system and low NO_x burners for NO_x control. While implementation of this alternative would result in continuing to burn coal at Riverside, it would also result in significant environmental benefits. A detailed description of this alternative project at Riverside is contained in Attachment 8-2. There may also be a need for addition costs refurbishment to extend the life of the facility. Table 8-4 provides an overview of this alternative project and justify the investment.

TABLE 8-4
SUMMARY INFORMATION FOR RIVERSIDE ALTERNATIVE PROPOSAL

Projected Book Life	15 Years	
Capacity	355.4 MW	4.6 MW net Decrease
Capital Cost (in 2001$)	$92.8 million	
Air Emissions Reductions	89% SO_2, 62% NO_x, 63% PM; 40% Mercury	

The comparative "before" and "after" review of emissions under this alternative project at Riverside is set forth below in Table 8-5.

TABLE 8-5
RIVERSIDE ALTERNATE PROPOSAL EMISSIONS RATE REDUCTIONS
Before and After Project Installation

	SO_2 Tons/yr	NO_x Tons/yr	CO_2 Tons/yr	CO Tons /yr	PM Tons/yr	Hg Lbs/yr
"Before"	12,038	13,160	2,737,416	338	541	93.6
"After"	1,334	5,004	2,212,109	349	200	77.9

As indicated above, this alternative provides somewhat fewer environmental benefits corresponding to a comparatively smaller investment required. Table 8-6 compares the overall environmental benefits of the Proposed Plan against the Alternative Plan.

D. Combined Benefits from Alternative Proposal

This Alternative Plan achieves some of the benefits regarding environment and hedging of future risks but does not offer the expansion benefits of these facilities. This Alternative Plan, is however less costly and falls more squarely within the statute. While Xcel Energy does not believe this alternative is the best choice, we wanted to assure stakeholders that if consensus cannot be reached on the more expansive approach offered by our Proposed Plan, we were still willing to proceed with significant environmental improvements at each of the three facilities.

TABLE 8-6
NET EMISSION PERCENT REDUCTIONS COMPARISON
PROPOSED PLAN VS ALTERNATIVE PLAN

Plant	SO_2		NO_x		PM	
	Proposed	Alt.	Proposed	Alt.	Proposed	Alt.
King	91%	91%	89%	89%	20%	20%
High Bridge	99%	77%	97%	65%	100%	12%
Riverside	100%	89%	99%	62%	100%	63%

The Alternative Plan only achieves a slight increase in capacity at these key sites but continues to utilize lower cost coal as the primary fuel at all of the sites.

The Alternative Plan achieves correspondingly lower mercury emission reductions when compared to the Proposed Plan. Table 8-7 compares the mercury reduction potential of the two plans.

TABLE 8-7
NET MERCURY (HG) RATE REDUCTIONS COMPARISON
PROPOSED PLAN VS ALTERNATIVE PLAN

Plant	"Before" (lbs)	"After" (Proposed Plan) (lbs)	"After" (Alternative Plan) (lbs)
King	58	46.4	46.4
High Bridge	63	0	50.4
Riverside	93.6	0	77.9

The Alternative Plan provides significant environmental benefits while complying with the restrictions of the Emissions Reductions Statute. While the benefits are not as dramatic as under the Proposed Plan, the costs are correspondingly lower for this Alternative Plan. Table 8-5 also provides similar composite information for the Alternative Plan that was also provided for the Proposed Plan. Attachment 8-3 provides the same type of rate information for the Alternative Plan as was provided for the Proposed Plan. As shown there, the maximum rate increase for an average residential customer should be about $1.86 per month.

TABLE 8-8
SUMMARY INFORMATION FOR ALTERNATIVE PROPOSAL

	Current Capacity Factor	Proposed Plan Capacity Factor	Projected Residential Monthly Rate Impact in 2010	Generating Capacity Increase (MW)	Projected Book Life
King	74%	82%	$1.07	60	25 years (2032)
High Bridge	52%	49%	$0.35	(4.4)	15 years (2023)
Riverside	67%	65%	$0.44	(4.6)	15 years (2024)
Composite	**N/A**	**N/A**	**$1.86**	**51**	**N/A**

It should be noted that detailed engineering of the Alternative Plan has not been completed. Rather, these are indicative results intended only to provide stakeholders with the basic characteristics of an alternative way of complying with the statute. Moreover, High Bridge and Riverside are both assumed to operate for the next 15 years without any substantial work. This scenario is not entirely realistic and causes the cost of the Alternative Plan to be understated. It is reasonable to believe that both High Bridge and Riverside will require some amount of refurbishment prior to 2020. That refurbishment will directly increase the price associated with the Alternative Plan.

The Proposal and Alternative Plan were also compared for the relative amount of environmental externalities credits associated with them. The externality ranges represent the "high case" scenario used in resource planning and apply the externality

values established by the Commission. Considering the location and characteristics of the three subject plants, we were able to approximate a range of externality credits associated with both the Proposal and Alternative Plans. We believe the net present value of the environmental externalities credits attributable to the Proposed Plan should fall within a range between $100 and $200 million. Likewise, the range for the Alternative Plan should be somewhere between $40 and $140 million. If these estimated externalities credits are deducted from the relevant PVRR, the present value of the Proposal and Alternative Plan can be compared as adjusted by the externality credits. Table 8-6 depicts this comparison.

TABLE 8-9
ENVIRONMENTAL EXTERNALITY CREDITS ADJUSTMENT TO PRESENT VALUE

	Proposed Plan (in millions)	Alternative Plan (in millions)
PVRR	$820	$729
Externality credit Range	$ (100) to (200)	$ (40) to (140)
Externality-Adjusted PVRR	$620-720	$591-691

Northern States Power Company
Adjustment to Remove Allen King Rehabilitation Costs
(Dollars in Thousands)

Line	Adjustment	Source		Amount
1	Capital Cost of Rehabilitation, 2001 $millions	5/2/02 Proposal, p 4-3	$	385
2	Handy White Index, Steam Production 2001	Handy-Whitman, Bul. 165		425
3	Handy White Index, Steam Production 2006	"		515
4	Inflation 2001-2006	Ln 9/Ln 8		1.2118
5	Annual Inflation Factor	Ln $4^{1/5}$		1.0392
5	Inflation to 2008	Ln 5^{7}		1.3085
6	Capital Cost of Rehabilitation, 2008 $millions	Ln 1 * Ln 5	$	674
7	ND Allocation Factor, Production Plant	Ex___(CWK-7), Sch 1		5.3367%
8	ND Cost of Rehab $000	Ln 6 * Ln 7	$	35,964
9	Allen King Total Investment Avg.Yr. 2008 ($000)	PSC IR 2-144, Attm A	$	262,785
10	Allen King Reserve Avg Yr. 2008 ($000)	PSC IR 2-144, Attm A	$	124,046
11	Reserve Ratio, Allen King 2008	Ln 10/Ln 9		47.204%
12	Rate Base Reduction ($000)	Ln 8 - (1 - Ln 11)		(18,987)
13	ND Depreciation Rate, Production Plant	Ex___(CWK-7), Sch 1		2.58%
14	Reduction in Depreciation Expense ($000)	Ln 8 * Ln 13	$	(928)
15				

Northern States Power Company
Adjustment to Alternative High Bridge Rehabilitation

Line	Description	Source	Amount ($Millions)
1	Capital Cost, Selected Plan	2002 Report, p. 4-8	394
2	Capital Cost, Alternative Plan	2002 Report, p. 8-3	77
3	Difference	Ln 1 - Ln 2	317
4	Inflation Factor 2001-2008	CWK-3, Ln 5	1.3085
5	Difference 2008 $	Ln 3 * Ln 4	415
6	North Dakota Allocator, Production Plant	CWK-7, Sch 1	5.3367%
7	North Dakota Capital Cost Reduction ($000)	Ln 5 * Ln 6	(22,137)
8	North Dakota Depreciation Rate, Steam Plant	CWK-6, Sch 1	2.58%
9	Depreciation Expense Reduction ($000)		(571)

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Xcel Energy
Case No.: PU-07-776
Response To: North Dakota Public Service Commission
Information Request No. 3-22
Analyst: Mike Diller
Date Received: February 28, 2008

Question:

Under Wind Power Mandate Minnesota legislation, Xcel is required to construct and operate, purchase, or contract to construct and operate 425 megawatts of wind conversion systems by December 31, 2002. The legislation also states that the Public Utilities Commission shall implement a preference for wind energy conversion systems located within the state of Minnesota. Please indicate how this legislation was implemented by NSP, where the conversion facilities are located, and quantify all revenue requirements associated with this wind energy included in the 2008 test year.

Response:

The 1994 Minnesota Legislature required the Company to construct and operate, purchase, or contract to construct and operate 425 MW of wind generation as part of the overall bill allowing additional dry cask storage at – and continued operations of – the Prairie Island nuclear plant.

NSP-MN instituted a competitive bidding process and issued several Request For Proposals (RFPs) for wind generation facilities to meet this requirement. Through several rounds of the competitive bidding process, up to 321.25 MW of qualifying large-scale wind generation projects were installed on the NSP-MN system (MN, ND and SD). In addition, another 103.75 MW of qualifying smaller wind generation projects were negotiated and contracted for installation, well before the December 31, 2002 deadline.

All of the wind generation discussed here is acquired through purchased power agreements, the costs of which are passed through the Fuel Cost Adjustment (FCA). As such, these contracts do not impact the 2008 revenue deficiency in this case.

The wind farms that comprise the 425 MW include:

Wind Farm	MW	Location
Wind Power Partners	25.0	Lake Benton, MN
Lake Benton I	107.3	Lake Benton, MN
Lake Benton II	103.5	Lake Benton, MN
Chanarambie Power Partners	85.5	Slayton, MN
Moraine Wind LLC	51.0	Murray County, MN
Shaokatan Hills	11.9	Lake Benton, MN
Lakota Ridge LLC	11.3	Lake Benton, MN
Woodstock Wind farm LLC	10.2	Woodstock, MN
Various (under 2 mW)	19.9	Various

Witness: Kent T. Larson
Preparer: Stephen A. Wilson
Title: Analyst, Purchased Power
Department: Renewable Energy Purchases
Telephone: 612-330-7980
Date: April 1, 2008

☐ **Non Public Document – Contains Trade Secret Data**
☐ **Public Document – Trade Secret Data Excised**
☒ **Public Document**

Xcel Energy
Case No.: PU-07-776
Response To: North Dakota Public Service Commission
Information Request No. 3-9
Analyst: Mike Diller
Date Received: February 28, 2008

Question:

Please provide the average capacity factors for wind generation in each state served by Xcel Energy. Also include achievable wind capacity factors known or believed to exist near the load centers in North Dakota.

Response:

The following table lists the annual capacity factor achieved* for the years 2005 through 2007 for wind generation in each state served by Xcel Energy.

	2005	2006	2007
Minnesota	30.8%	33.6%	34.7%
North Dakota	-	29.9%	31.1%
South Dakota	-	-	-
Colorado	31.1%	32.3%	34.2%
Texas	34.5%	34.0%	32.9%
New Mexico	37.2%	41.4%	39.4%

* Calculated using only facilities in commercial operation on January 1 of the given year, with the exception of the 2006 factor for the Velva, North Dakota wind farm, which went into service on January 19, 2006.

** Many of the wind facilities included in these calculations are smaller turbines at lower heights than assumed in the below-referenced WindLogics study.

In its 2006 Minnesota Wind Integration Study, WindLogics projected mean annual wind capacity factors for the Fargo, Grand Forks and Minot areas of about 38 to 50 percent. These estimates assume Vestas V85 1.65 MW wind turbines on 80-meter

towers. Attachment A to this response provides a map from the WindLogics study illustrating mean annual wind capacity factors for Minnesota and parts of North Dakota, South Dakota and Wisconsin. The complete final report from WindLogics 2006 Minnesota Wind Integration Study can be found at the following link.

http://www.uwig.org/windrpt_vol%202.pdf

Witness:	Kent T. Larson
Preparer:	Philippa Narog
Title:	Renewable Energy Portfolio Manager
Department:	Resource Planning & Acquisition
Telephone:	(303) 571-2839
Date:	April 16, 2008

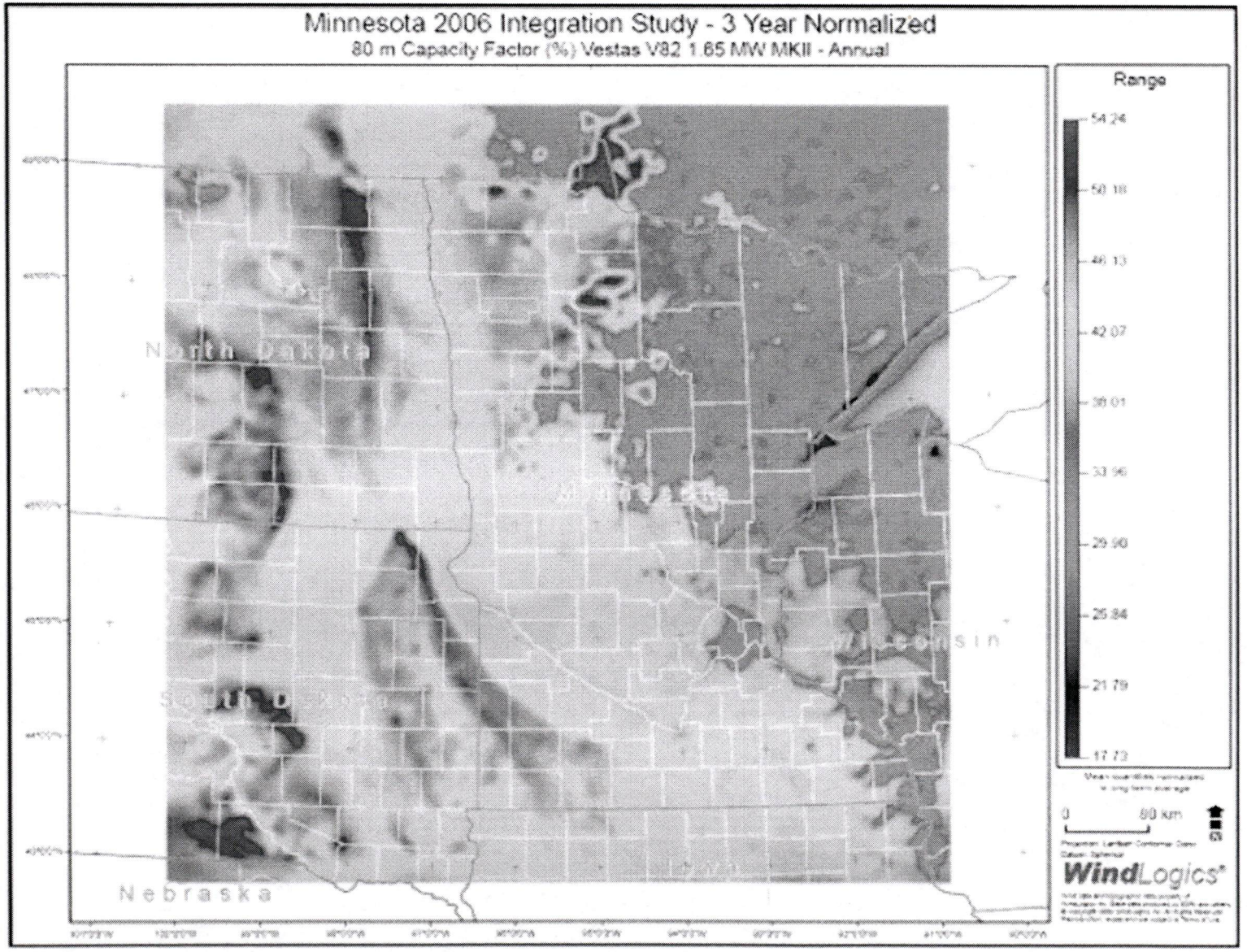

Figure 47: Mean annual capacity factor at 80 m for the Vestas V82 1.65 MW

Northern States Power Company
Calculation of Snavely King Recommended Depreciation Expense
For North Dakota Jurisdiction

	Company Proposed			Snavely King Recommended			Difference
Function	Total Company Accrual (a)	ND Accrual (b)	ND Allocator (c)=(b)/(a)	Total Company Rate (d)	Total Company Accrual (e)	SK ND Accrual (f)=(e)*(c)	
Steam Production	76,257			2.58%	56,499		
Nuclear Production	62,600			1.16%	20,521		
Nuclear Decommissioning	34,214				34,214		
Hydro Production	351			3.00%	351		
Other Production	23,610			2.39%	16,860		
Total Production	197,032	10,515	5.3367%		128,446	6,855	(3,660)
Transmission	40,457	2,332	5.7641%	2.58%	39,168	2,258	(74)
Distribution	84,804	3,740	4.4102%	2.71%	76,175	3,359	(381)
General	12,708	749	5.8939%	5.22%	12,708	749	
Common	33,332	2,009	6.0272%	8.24%	33,332	2,009	
Total	368,333	19,345 1/			289,828	15,230	(4,115)

1/ Base depreciation expense calculated for revenue requirement is $19,151. No explanation is given as to the difference.

Sources:
Cols. (a) and (b) from Company Workpapers P1-1L and P1-1M.
Cols. (d) and (e) from Schedules 2 and 3.

Northern States Power Company
Calculation of Snavely King Recommended Rates and Accruals
Production Plant
Total Company Basis
($000)

	Plant Balance 1/1/2008 (a)	Plant Balance 12/31/2008 (b)	Average Plant Balance 12/31/2008 (c)=((a)+(b))/2	Plant Additions 2008 (d)	Reserve Balance 1/1/2008 (e)	2008 BOY Balance Calculation: Remaining Life years (f)		Net Salvage % (g)	Depreciation Expense (h)	Plant Additions: Remaining Life years (i)	Net Salvage % (j)	Depreciation Expense (k)	2008 Test Year (l)=(h)+(k)	2008 Composite Rate (m)=(l)/(c)
Production Plant														
Production Land	28,802	28,802	28,802	-	-									
Steam Production														
Black Dog	126,494	129,669	128,082	3,175	106,091	7.00		(6.50)	4,082	7.00	(6.50)	241	4,323	
High Bridge	-	-	-	-	-	-		(20.00)	-	-	(20.00)	-	-	
Allen S. King	626,785	626,785	626,785	-	134,046	29.50		(1.60)	17,047	29.50	(1.60)	-	17,047	
Minnesota Valley	14,038	14,038	14,038	-	17,073	9.50		(70.00)	715	9.50	(70.00)	-	715	
Red Wing	43,032	45,105	44,069	2,073	41,188	5.00		(4.60)	763	5.00	(4.60)	217	980	
Riverside Unit 7	101,126	102,024	101,575	898	87,087	1.50		(1.70)	10,525	1.50	(1.70)	305	10,830	
Riverside Unit 8	84,270	84,270	84,270	-	81,149	1.50		(5.20)	5,002	1.50	(5.20)	-	5,002	
Sherco Unit 1 & 2	512,409	530,927	521,668	18,518	356,880	27.00	1/	(5.10)	6,728	27.00	(5.10)	360	7,089	
Sherco Unit 3	625,585	625,585	625,585	-	384,560	27.00	1/	(4.10)	9,877	27.00	(4.10)	-	9,877	
Wilmarth	40,425	41,226	40,826	801	39,790	5.00		(5.30)	553	5.00	(5.30)	84	637	
Total/Composite	2,174,164	2,199,629	2,186,897	25,465	1,247,864				55,292			966	56,499	2.58%
Nuclear Production														
Monticello	597,576	607,420	602,498	9,844	467,364	22.80		-	5,711	22.80	-	216	5,927	
Prairie Island Unit 1 & 2	1,153,828	1,190,736	1,172,282	36,908	807,421	25.00	1/	-	13,856	25.00	-	738	14,594	
Total/Composite	1,751,404	1,798,156	1,774,780	46,752	1,274,785				19,567			954	20,521	1.16%
Nuclear Fuel	1,379,121	1,542,721	1,460,921	163,600	-									
Nuclear Decommissioning	-	-	-	-	-								34,214	
Hydro Production														
Hennepin Island	6,391	6,401	6,396	10	2,660	26.20		(30.00)	215	26.20	(30.00)	0	215	
Lower Dam	805	805	805	-	801	26.20		(30.00)	9	26.20	(30.00)	-	9	
Upper Dam	4,515	4,515	4,515	-	2,540	26.20		(30.00)	127	26.20	(30.00)	-	127	
Total/Composite	11,711	11,721	11,716	10	6,001				351			0	351	3.00%
Other Production														
Alliant Tech	467	467	467	-	400	4.80		-	14	4.80	-	-	14	
Angus C. Anson Unit 2 & 3	115,869	118,375	117,122	2,506	42,539	31.00	1/	(0.60)	2,388	31.00	(0.60)	41	2,429	
Black Dog Unit 5	121,140	121,250	121,195	110	14,132	24.00		(1.00)	4,509	24.00	(1.00)	2	4,511	
Blue Lake	92,806	92,853	92,830	47	29,397	23.00		(0.40)	2,774	23.00	(0.40)	1	2,775	
Granite City	8,554	8,554	8,554	-	8,467	6.00	1/	(8.80)	140	6.00	(8.80)	-	140	
Grand Meadow Wind Farm	-	221,801	110,901	221,801	-	25.80		-	-	25.80	-	1,848	1,848	
High Bridge	-	369,509	184,755	369,509	-	45.40	1/	-	-	45.40	-	4,069	2/ 4,069	
Inver Hills	52,454	53,972	53,213	1,518	45,635	9.00	1/	(0.70)	798	9.00	(0.70)	85	2/ 883	
Key City	8,609	8,609	8,609	-	9,771	7.00	1/	(20.00)	80	7.00	(20.00)	-	80	
United Healthcare	817	817	817	-	787	0.50		-	30	0.50	-	-	30	
United Hospital	2,032	2,032	2,032	-	1,251	9.70		-	80	9.70	-	-	80	
West Faribault	3,704	3,704	3,704	-	5,185	-		(40.00)	-	-	(40.00)	-	-	
Total/Composite	406,452	1,001,943	704,198	595,491	157,564				10,813			6,046	16,860	2.39%
Total Production	5,751,654	6,582,972	6,167,313	831,318	2,686,214				86,024			7,967	128,446	2.08%

1/ SK life change
2/ Calculation of Company accrual unknown (not based on formula used elsewhere).

Sources:
All data for unchanged facilities from NDPSC IR 2-144.
SK remaining lives (cols. (f) and (i)) from Schedule 4.
SK expense (cols. (h) and (k)) is calculated.

Northern States Power Company
Calculation of Snavely King Recommended Rates and Accruals
Transmission, Distribution and General Plant
Total Company Basis
($000)

	Plant Balance 1/1/2008 (a)	Plant Balance 12/31/2008 (b)	Average Plant Balance 12/31/2008 (c)	Company Proposed Net Salvage % (d)	Company Proposed Rate (e)	Company Proposed 2008 Test Year Expense (f)	Composite ASL (g)	Composite Whole Life Rate (h)=1/(g)	Plant Only Expense (i)=(c)*(h)	Average NS (j)	Total SK Accrual (k)=(i)+(j)	SK Composite Rate (l)=(k)/(c)
Transmission Plant												
MN-E Transmission Land	50,029	50,029	50,029	-	0.0000%	-						
MN-E Transmission Substations-Prod	42,781	42,781	42,781	-	2.6129%	1,118						
MN-E Transmission Substations-Trans	639,887	680,111	659,999	-	2.6129%	17,088						
MN-E Transmission Lines	683,498	849,266	766,382	(19.66)	2.9014%	22,251						
Total Transmission	1,416,195	1,622,187	1,519,191			40,457	39.91	2.51%	38,132	1,036	39,168	2.58%
Distribution Plant												
MN-E Distribution Land	14,905	15,578	15,242	-	0.0000%	-						
MN-E Distribution Substations-Prod	3,536	3,536	3,536	(11.31)	2.8943%	102						
MN-E Distribution Substations-Dist	436,080	463,205	449,643	(11.31)	2.8943%	13,040						
MN-E Distribution Lines	1,543,964	1,672,540	1,608,252	(11.63)	2.8801%	46,307						
MN-E Distribution Other	683,759	686,994	685,377	(6.88)	3.2309%	22,170						
MN-E Distribution Street Lighting	46,379	49,189	47,784	(20.00)	6.6720%	3,185						
Total Distribution	2,728,623	2,891,042	2,809,833			84,804	36.72	2.72%	76,427	(252)	76,175	2.71%
Electric General Plant 1/												
Land	4,356	4,356	4,356	-	0.0000%	-					-	
Computer Software	25,751	28,515	27,133	-		3,719					3,719	
Structure	50,567	51,161	50,864	-	2.2224%	1,227					1,227	
Office Furniture & Equipment	16,659	17,059	16,859	5.00	5.2776%	890					890	
Network Equipment	11,748	12,526	12,137	-	24.9996%	1,724					1,724	
Tools & Equipment	69,678	74,275	71,977	0.19	6.7927%	3,396					3,396	
Transportation	23,750	32,017	27,884	8.10	8.5418%	-					-	
Telecommunications Equipment	29,853	34,517	32,185	-	11.1108%	1,752					1,752	
Total Elec General	232,362	254,426	243,394			12,708					12,708	5.22%
Common General: Allocation to Electric 1/												
Land	3,780	3,780	3,780	-	0.0000%	-					-	
Computer Software	202,891	218,093	210,492	-		20,996					20,996	
Structure	80,904	87,931	84,418	-	2.2224%	1,939					1,939	
Office Furniture & Equipment	27,123	27,146	27,135	5.00	5.2776%	1,378					1,378	
Network Equipment	50,624	53,031	51,828	-	24.9996%	7,644					7,644	
Tools & Equipment	7,328	7,564	7,446	0.72	6.3350%	186					186	
Transportation	6,418	6,929	6,674	7.43	8.5019%	-					-	
Telecommunications Equipment	12,939	12,939	12,939	-	11.1108%	1,189					1,189	
Total Common General	392,007	417,413	404,710			33,332					33,332	8.24%

1/ Accepted Company proposed accrual due to no inclusion of cost of removal.

Sources:
Cols. (a) - (f) from NDPSC IR 2-144.
Col. (g) from Schedule 5.
Col. (j) from Schedule 6.

Northern States Power Company
Calculation of Snavely King Recommended Remaining Lives - Production Plant

As of January 1, 2008

	Year Originally Constructed (a)	1/1/2008 Remaining Life years (b)	Calculated Retirement Year (c)=2008+(b)	Calculated Life Span (d)=(c)-(a)		SK Life Span (e)	Addition To Rem. Life (f)=(e)-(d)	SK Remaining Life (g)=(b)+(f)	
Steam Production									
Black Dog	1952	7.00	2015	63		63	-	7.00	
High Bridge		Fully Depreciated							
Allen S. King	1968	29.50	2038	70		70	-	29.50	
Minnesota Valley	1932	9.50	2018	86		86	-	9.50	
Red Wing	1949	5.00	2013	64		64	-	5.00	
Riverside Unit 7	1911	1.50	2010	99		99	-	1.50	
Riverside Unit 8	1911	1.50	2010	99		99	-	1.50	
Sherco Unit 1 & 2	1976	12.00	2020	44		59	15	27.00	
Sherco Unit 3	1976	12.80	2021	45		59	14	27.00	
Wilmarth	1948	5.00	2013	65		65	-	5.00	
Nuclear Production									
Monticello	1971	22.80	2031	60		60	-	22.80	
Prairie Island Unit 1 & 2	1973	6.30	2014	41		60	19	25.00	
Other Production									
Alliant Tech		4.80	2013					4.80	2/
Angus C. Anson Unit 2 & 3	1994	16.70	2025	31		45	14	31.00	
Black Dog Unit 5	1987	24.00	2032	45		45	-	24.00	
Blue Lake	1974	23.00	2031	57		57	-	23.00	
Granite City	1969	2.00	2010	41		45	4	6.00	
Grand Meadow Wind Farm		25.80	2034					25.80	2/
High Bridge	1924	30.40	2038	30	1/	45	15	45.40	
Inver Hills	1972	5.00	2013	41		45	4	9.00	
Key City	1970	2.00	2010	40		45	5	7.00	
United Healthcare		0.50	2009					0.50	2/
United Hospital		9.70	2018					9.70	2/
West Faribault	1965	-	2008	43		45	2	2.00	

1/ Company estimates new High Bridge Plant in-service date of May 1, 2008, with 30-year proposed life. See NDPSC IR 2-157-Attachment C, p. 6.
2/ No in-service year available - used Company proposal.

Sources:
Col. (a) from NSP 2007 FERC Form 1, p. 402-411.
Col. (b) from NDPSC IR 2-144.

Northern States Power Company
Calculation of Composite ASL
Transmission and Distribution Plant
Based on Plant Balances as of 1/1/2003

	Account	Plant Balance 1/1/2003 (a)	ASL (b)		NS % (c)	Future NS $ (d)=(a)*(c)	Total To Accrue (e)=(a)-(d)	Accrual (f)	Composite ASL (g)=(e)/(f)
Transmission Plant									
352	Structures and Improvements	16,024,428	45		-	-	16,024,428	356,098	
353	Station Equipment	409,032,781	38		-	-	409,032,781	10,764,021	
354	Towers and Fixtures	95,703,366	46		(25.00)	(23,925,842)	119,629,208	2,600,635	
355	Poles and Fixtures	155,176,023	38		(10.00)	(15,517,602)	170,693,625	4,491,938	
356	Overhead Conductors & Devices	150,813,328	42		(30.00)	(45,243,998)	196,057,326	4,668,032	
357	Underground Conduit	5,834,658	55		-	-	5,834,658	106,085	
358	Underground Conductors & Devices	8,494,161	40		-	-	8,494,161	212,354	
	Total Transmission	841,078,745				(84,687,442)	925,766,187	23,199,162	39.91
Distribution Plant									
361	Structures and Improvements	28,761,068	45		(30.00)	(8,628,320)	37,389,388	830,875	
362	Station Equipment	359,286,347	38		(10.00)	(35,928,635)	395,214,982	10,400,394	
364	Poles, Towers and Fixtures	209,673,296	40		(90.00)	(188,705,966)	398,379,262	9,959,482	
365	Overhead Conductors & Devices	248,405,289	40	1/	(30.00)	(74,521,587)	322,926,876	8,073,172	
366	Underground Conduit	132,285,964	47		-	-	132,285,964	2,814,595	
367	Underground Conductors & Devices	616,985,888	38		20.00	123,397,178	493,588,710	12,989,177	
369	Overhead Services	62,957,534	40		(30.00)	(18,887,260)	81,844,794	2,046,120	
369	Underground Services	146,184,826	40		(30.00)	(43,855,448)	190,040,274	4,751,007	
373	Street Lighting & Signal Systems	39,190,745	18		(20.00)	(7,838,149)	47,028,894	2,612,716	
	Total ASL Study	1,843,730,957				(254,968,188)	2,098,699,145	54,477,538	
368	Line Transformers	278,641,875	32		10.00	27,864,188	250,777,688	6,912,850	
368	Line Capacitors	16,777,443	25		-	-	16,777,443	645,682	
370	Meters	105,687,711	20		-	-	105,687,711	5,284,386	
	Total Vintage Study	401,107,029				27,864,188	373,242,842	12,842,918	
	Total Distribution	2,244,837,986				(227,104,000)	2,471,941,986	67,320,456	36.72

1/ Reflects SK life extension of 5 years.

Sources: Cols. (a) and (f) from NDPSC IR 2-139 Attachment A, p. 22 of 80 and Attachment B, pp. 28-34 (Vintage Study accounts). Account 365 reflects SK recommended 5-year life extension.
Cols. (b) and (c) from NDPSC IR 2-139 Attachment A, p. 18 and Attachment B, p. 18 (Vintage Study accounts).

Northern States Power Company
alculation of Five-Year Average Net Salvag
2002-2006

Year	Gross Salvage	COR	Net Salvage
Transmission			
2002	-	11,283	(11,283)
2003	1,512,690	(486,154)	1,998,844
2004	1,499,301	(591,444)	2,090,745
2005	2,563,104	1,075,140	1,487,964
2006	201,380	588,229	(386,849)
Total	**5,776,475**	**597,054**	**5,179,421**
Average	**1,155,295**	**119,411**	**1,035,884**
Distribution			
Depreciated Accounts			
2002	287,216	2,774,077	(2,486,861)
2003	742,729	391,461	351,268
2004	2,739,688	877,951	1,861,737
2005	3,153,103	4,501,509	(1,348,406)
2006	3,794,466	3,496,504	297,962
Vintage Group Accounts			
2002	24,103	(157,599)	181,702
2003	1,212	(1,738)	2,950
2004	172,287	252,180	(79,893)
2005	144,175	265,445	(121,270)
2006	441,331	362,802	78,529
Total Distribution			
2002	311,319	2,616,478	(2,305,159)
2003	743,941	389,723	354,218
2004	2,911,975	1,130,131	1,781,844
2005	3,297,278	4,766,954	(1,469,676)
2006	4,235,797	3,859,306	376,491
Total	**11,500,310**	**12,762,592**	**(1,262,282)**
Average	**2,300,062**	**2,552,518**	**(252,456)**

Source: NDPSC IR 2-169.

CORP_	NAME_C	April	May	June	July	August	September	October	November	December	January	February	March	total
3361	2712270 Manitoba Ltd O/A Pizzey's Milling and Baking	0	1690	0	585	3801	1241	64	0	0	9251	1260	5551	23443
3309	Appert Acres Inc.		0											0
493	Archer Daniels Midland Co.			16362122	22595004	35605743	20689368	20935057	12133158	14955065	18205393	12175543	9617926	183274379
3363	Braaten Trucking & Grain Company Inc	0	0	0	0	0	0	0	0	0	0	0	0	0
817	Cargill, Incorporated	266500	947600	1387354	1063000	348640	597400	74400	518000	494554	521040	220824	260910	6700222
3364	Central Distributing Co. Inc.	53898	28645	18983	22966	9599	5748	0	8436	43414	34294	45104	18185	289272
847	CHS, Inc.	13379212	10388683	9318419	12042661	16949663	16208278	31829546	9943766	17980811	23542278	14869298	9943765	186396380
3419	CLD Pacific Grain, LLC	0	0	0	0	0		0	0	0	0	0		0
3243	Columbia Grain International	1129796	853301	4037137	500519	1609104	2212363	2283716	822510	726509	1037781	1051227	261112	16525075
3365	Commodity Marketing Company	102852	81270	89871	83430	70268		33719	100634	91026	137074	143599	166932	1100675
3163	Commodity Specialists Company													0
3300	C-Shore International Inc.													0
3367	Dakota Farms International, Ltd. dba DFI, Ltd.			0										0
3254	Dakota Pride Cooperative Leland Barth													0
2045	Demeter (1993) Inc. dba Agricore United													0
3340	Falkirk Merchandising, LLC													0
3370	FGDI L.L.C.													0
3371	Frances & Steven Eidsness dba Eidsness Trucking		0											0
3372	Golden Growers Cooperative	256835	225276	177431	252948	201417	468118	683970	653708	377684	358488	165221	248708	4069804
3374	Grain Millers Inc	5696	21225	11227	22598	18254	16036	13269	15134	31858	47955	20932	30329	254513
3507	Great Northern Ag						0	0		13040	0	860	0	13900
3375	Great Western Malting	0	0	0	0	0	0	0	0	0	0	0	0	0
3326	Hawkeye Commodities Company	69706	36859	30231	30273	50307	39609	20154	9020	36026	78114	35356	38950	474605
3532	Heartland Mill, Inc. dba HMI Sourcing										6982	10944	12123	30049
3439	Hinrichs Trading, LLC	0	0	0	0	0		0					0	0
3378	Hi-Pro Sunflower LLC	152	168	0	12771	3205	3131	0	8596	5599	16014	14943	7075	71654
2738	Horizon Milling, LLC	2279230	1339006	1127187	1148526	986629	3344837	2593326	1206925	622312	1067326	671732	20514	16407550
3512	Inter-Marketing, Inc.							99805.91	99805.91	99805.91	0	1920	0	301337.73
3379	James Richardson International Inc	154771	66618	190823										412212
3380	John Rott dba John Rott Trucking													0
3381	Kevin Symanowski													0
3350	Keystone Grain Ltd	12307	944	26768	3873	17188	0	15509	53444		41958	29219	12418	213628
3382	Koppinger Trucking LLC	11176	14433	9069	4226	7511	3524	9909	15155	7708	7352	13869	4061	107993
3384	Lansing Trade Group, LLC													0
3406	Larry's Seed & Ag Supply Inc	31190	31190											62380
3404	Lehmann Grain, Inc.				3970	3970	3969	7701	7701	7701			11832	46844
3385	Louis Dreyfus Corporation	6295128	2592971	2064107	1534876	16229472	0	0		0	0	0	0	28716554
3386	Marlow & Sandy Werth		0											0
3455	MG Grain, LLC						0	0						0
3387	Montana Specialty Mills LLC	0	6964	6651										13615
3516	NFO Members Grain, Inc.						3757	7298	0	407	3427	11839	5377	32105
3528	North Pacific Group, Inc. dba North Pacific								7256	5175	15959	15469	26221	70080
3389	Oilseeds International Ltd.	0	143	361936	0	0	32098	11174	9042	6789	59102	277425	45420	803129
3390	Parent Seed Farms Ltd	4890	0	0	0	0	2424	3327	1690	8063	0	3393	0	23787
3349	PKT Associates, Inc.		125778	79700	199546			652367		73109	0	81336		1211836
3488	Premium Gold Flax Products, Inc.													0
3320	Pro Co-op	63003	30202	0	10107	0	134065	114927	68377	30722	108597	64123	47920	672043
3392	Renee E Miller		0											0
3411	Robert Schear dba R S Grain	7247	7259		5848	29613	3496	11253	22622	19201	9481	18423	0	134443
1460	Roehl Transfer Inc. dba Heil Grain & Feed	0	2060	1199	2176	0	2238	2131	0	0	0	3381	4186	17371
3394	Roger and Stacey Gussiaas Farm Inc.			0										0
3395	Safflower Technologies International LLC													0
3396	Schulz Grain & Trading Co Inc													0
3177	Seed-Ex Inc.	67659	87166	37948	34521	15616	51152	54022		55872		42924	34852	481732
3397	SK Food International Inc													0
3398	SKE Midwestern Inc													0
1202	Specialty Commodities Inc	879	0	0	856	0	20965	59884	1992	7773	0	2927	4906	100182
3407	Spokane Seed Company	23123	0											23123
3517	Sunbird, Inc.							0	0	0	0	0	0	0
3256	Sunrich LLC	107188	149175	108563	14610	66887	18282	106137	343828	202047	433958	137891	160453	1849019
3216	Technology Crops, Inc.	42268	546936	43108	144964	0	0	0	446544	2164	476160	0		1702144
3276	The Scoular Company	0	0	0	0	0								0
2742	Trinidad Benham Corp.	170665	142467	161493	112738	286600	92930	202952	233207	201222	112975	23388		1740637
3438	US Bio Hankinson LLC													0
3399	Walker Seeds Ltd													0

AVERAGE LIFE DEPRECIATION STUDY 2003

CAPITAL ASSET ACCOUNTING

Xcel Energy
NORTHERN STATES POWER

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

LeRoy Koppendrayer	Chair
Ellen Gavin	Commissioner
Marshall Johnson	Commissioner
Gregory Scott	Commissioner
Phyllis Reha	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY D/B/A/ "XCEL ENERGY" AVERAGE LIFE DEPRECIATION STUDY 2003	DOCKET NO. E, G002/D-02-1471 **PETITION FOR APPROVAL**

INTRODUCTION

Pursuant to Minnesota Statute Section 216B.11 and Minnesota Rules 7825.0500 through 7825.0900, Northern States Power Company d/b/a Xcel Energy ("Xcel Energy" or "Company" or "NSP") hereby petitions the Minnesota Public Utilities Commission ("MPUC" or "Commission") for an order approving the Average Life Depreciation Study 2003 to be effective January 1, 2003.

I. General Filing Information

Pursuant to Minnesota Rules 7825.3200, 7825.3500, and 7829.1300, subparagraph 3; Xcel Energy provides the following required information:

A. Name, Address, and Telephone Number of Utility

Northern States Power Company, d/b/a/ Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Christopher B. Clark
Assistant General Counsel
Xcel Energy Services
800 Nicollet Mall, Suite 2900
Minneapolis, MN 55402
(612) 215-4593

C. Date of Filing and Date Proposed Rates Will Take Effect

This petition is being filed February 1, 2003 pursuant to the Commission's order dated October 1, 2002, under Docket No. E, G002/D-02-1471. Xcel Energy requests the effective date of this change to be January 1, 2003.

D. Statute Controlling the Filing

Under Minnesota Rule 7829.0100, subparagraph 11, this request for approval of remaining lives is a "miscellaneous" filing because no determination of the Xcel Energy general revenue requirements is necessary. There is no specific statute that prescribes the amount of time the Commission has to rule on this petition.

E. Signature and Title of Utility Employee Responsible for the Filing

Lisa H. Perkett
Director, Capital Asset Accounting

Dated: February 1, 2003

F. Effect of the Change in Rates

This instant petition will not impact rates, the price of Xcel Energy gas and electric service, or the terms and conditions of service. Rather, the changes will reflect the way Xcel Energy recognizes the depreciation expenses for the relevant assets in the current year.

II. Filing Extension

On September 3, 2002, Xcel Energy requested an extension to the required submittal date for its Average Service Life and Vintage Group studies for the recovery of depreciation. The extension was requested for two reasons, the implementation of the new Statement of Financial Accounting Standard and the implementation of a new accrual software system. The extension was granted by the MPUC on October 1, 2002.

A. Asset Retirement Obligation

The Financial Accounting Standard Number 143, *Accounting for Asset Retirement Obligations* (ARO), was issued in June 2001. The statement is effective for fiscal years beginning after June 15, 2002. Briefly, the ARO requires that all entities provide special accounting treatment to record the legal obligations associated with the retirement of tangible long-lived assets. The FERC issued a Notice of Proposed Rulemaking on October 30, 2002. Comments and a final rule are expected midyear 2003.

Transmission and distribution property was one area where an investigation was needed to determine if potential ARO's existed with associated legal obligations resulting from contracts, law, and statutes or by legal construction of a contract under the doctrine of promissory estoppel. The requested extension for this filing was needed to allow time to perform this investigation and if necessary to identify these obligations. An inventory of transmission and distribution operation managers was taken, and no ARO's were identified that were created through the doctrine of promissory estoppel. However, there are some potential ARO's for transmission and distribution property created by contracts, law and statutes.

Transmission and distribution lines are built on right of ways granted through property easement agreements. Xcel Energy has thousands of these agreements and review of the documents was not considered to be within reason. Generally, the easements are perpetual and do not require removal of assets or restoration of the land. However, since not all documents were reviewed, there is a possibility that an easement requiring removal or restoration could exist. This likelihood is considered remote and since specific obligations have not been identified, a reasonable estimate of their fair value is not available. No ARO would be recorded but disclosure is required.

There may be potential ARO's associated with certain interim retirements of transmission and distribution property that are components of the system. Examples would be wood poles and electrical equipment containing PCB's, such

as transformers and capacitors. The decision to retire and remove this equipment would be based on operational conditions not legal requirements. When an interim retirement is made, the removal and disposal of these assets would then meet the requirements for recognition of an ARO. However, since the settlement of the obligation would coincide with the decision to remove, no ARO would be recorded.

At this time Xcel Energy will not be recording any ARO's for Transmission and Distribution property however a disclosure may be necessary in the Company financial statements. The Company will continue to search for potential ARO's and monitor the discussions and proposals as FERC progresses towards the issuance of a final rule.

B. PowerPlant

In late 2001 through early 2002 Xcel Energy installed a new property accounting software system (PowerPlant version 7.3) that was designed specifically for utility and other asset intensive industries. PowerPlant is made up of several subsystems (modules) that can be installed stand alone or integrated with other systems. In September 2002 the Company installed the current version 8.0 of PowerPlant that included a Depreciation Studies module that became fully functional in December. This module was used to perform the actuarial and semi-actuarial analysis associated with this depreciation study. It integrates directly into the continuing property records and uses industry-accepted methodologies. For the purpose of this study, both life and salvage analyses were performed with the use of the PowerPlant Depreciation Studies module.

III. Description of and Reason for Electric Utility Average Life Depreciation Study

A. Background

Where information was available, each primary account was subjected to a statistical analysis. Some accounts present a better basis for statistical analysis than others. A very important part of each account analysis is the review of the property with construction, operating, and planning personnel who work with the property first hand. Their input into the characteristics of life and salvage can be more influential in forecasting the appropriate depreciation rate than the available numerical data.

This depreciation rate discussion is broken down into two parts: the average service life change and the net salvage rate change. Schedule A compares the

present and proposed lives and rates. Schedule B applies the two rates to plant balances to compare depreciation expense changes. Schedule C shows the proposed lives, curves, net salvage rates, and depreciation rates for all accounts. Schedule D contains the corresponding data tables for all accounts with a recommended life change. Schedule E contains the net salvage trend analysis for all accounts where a change was recommended. These five schedules are for both the Electric and Gas accounts.

In the Annual Review of Remaining Lives 2000, Docket No. E, G002/D-00-471, Xcel Energy requested and the Commission approved extending the use of vintage year accounting to both distribution line transformers (FERC 368) and distribution electric and gas meters, as well as house regulators (FERC 370, 381, and 383). The use of this depreciation technique does not capture retirement information and, as such, most mathematical methods for gauging the appropriate average service life are ineffective. Like the general plant assets under Accounting Release No. AR-15, these accounts have high volume and low value of individual items. These FERC accounts will now be presented in the vintage group filing using the forecast method.

B. Major Future Additions and Retirements

Minnesota Rules, Section 7825.0700, Subpart 2B, states that each utility shall provide, with the petition for certification, a list of major future additions or retirements to the plant accounts that the utility believes may have a material impact on the current certification results. Xcel Energy does not anticipate any major future additions or retirements in the Electric Utility plant accounts which may materially affect the depreciation rates recommended in this study. The absence of clearly identifiable major future additions or retirements means that ongoing future additions and retirements can have an influence on life and salvage estimates, but usually do not result in dramatic changes. Rather, these additions and retirements indicate gradual changes in the characteristics of the equipment classified in an account. In those cases where ongoing additions and retirements are believed to influence the life and salvage estimates, these effects have been addressed in the individual account analysis.

C. Transmission

Electric Transmission is a FERC functional group of plant accounts that includes the original cost of such plant and equipment. Xcel Energy electric generating plants are interconnected by a network of transmission lines and substations which are energized at voltages ranging from 69KV to 500KV. This network provides a means of transmitting power from generating plants to

distribution systems where the voltage is then reduced to a primary voltage level. The Xcel Energy system interconnects with transmission lines of other utilities via this network.

The current lives and depreciation rates for Electric Transmission facilities were approved by the MPUC in Docket No. E, G002/D-97-1307 and became effective January 1, 1997. Mathematical analysis of life and salvage history data provides trends either up, down, or relatively the same. No single life or salvage rate is necessarily the right one especially when using the semi-actuarial technique. The mathematical results of the appropriate average service life are more likely to provide a range of acceptable service lives. The current service life is then compared to the range, and with the input of Company personnel familiar with the particular assets, a recommendation of service life and net salvage rate is made.

Changes are not recommended if the current and proposed lives and salvage rates are deemed to be relatively close. For example, the Company is unlikely to recommend an adjustment for a life change of one or two years on an account that has a 45-year average service life because it may still fit into the recommend range provided by the mathematical analysis.

The current average service lives and net salvage rates for Electric Transmission facilities have been reviewed by Company personnel. The analysis found all current average service life and salvage data recommended and approved in the 1997 study remains appropriate for use today. Xcel Energy recommends the continued use of all previously approved lives and net salvages rates for Electric Transmission property.

D. Distribution

Electric Distribution is a FERC functional group of accounts which includes structures and improvements, conversion equipment, conductors, and other facilities employed to carry power between the Transmission system and the customer. The majority of the Xcel Energy Distribution system is energized at 13.8KV.

The average service lives and net salvage rates as of Electric Distribution facilities have been reviewed by Company personnel. The analysis found all current data to be appropriate except as identified and discussed below.

1. Change in Average Service Life

a. Overhead Conductors and Devices (FERC Account 365)

This account includes the installed cost of overhead conductors and devices used for distribution purposes. Items include conductor, switches, fused cutouts, reclosers, sectionalizers and surge arresters.

This electric distribution account uses the first-in first-out method to record retirements. The lack of aged retirement data necessitates that the assets within FERC Account 365 be analyzed with the use of the semi-actuarial method called Simulated Plant Record (SPR). This method will simulate the age of all retirements within the account and through mathematical analysis suggests the best age fits for average service life and also provides a curve type.

The SPR analysis for FERC Account 365 using the simulated balances method is provided in ***Life Analysis, Simulated*** (Schedule D). An average service life can be found for each survivor curve (Dispersion) within a group or family such that the sum of squared differences between the recorded balance and the simulated balances is minimized. The survivor curve and the average service life which yields the smallest minimum sum of the squared differences is taken as the best descriptor of the observed retirement experience. The best age fits have a high Retirement Experience Index (at or very near 100) and a low Sum of Squared Differences.

The range of best age fits for FERC Account 365 is between 34 and 44 years. Discounting the high and low extremes, the range indicates the appropriate average service life should be in the mid to high thirties. Xcel Energy recommends that the average service life for distribution overhead conductors and devices be changed from 32 to 35 years with an R1 dispersion.

2. Change in Net Salvage Rates

a. Overhead Conductors and Devices (FERC Account 365)

This account includes the installed cost of overhead conductors and devices used for distribution purposes. Items include

conductor, switches, fused cutouts, reclosers, sectionalizers and surge arresters.

Salvage and removal expense history data and analysis for FERC Account 365 can be found in ***Net Salvage Analysis*** (Schedule E). The net salvage is first calculated for each individual year of data; then smoothed by averaging the annual results into 10-year rolling bands. The smoothing of the historical data produces an overall trend and assists in the selection of an appropriate net salvage.

Analysis of the smoothed historical data shows that since the early 1990's this account has demonstrated an increasing negative net salvage. This trend is typical of many accounts and is the result of smaller salvage values and increasing removal costs. Xcel Energy recommends changing the net salvage rate from –20% to –30%.

b. Overhead and Underground Services (FERC Account 369)

This account includes the installed cost of services leading from a point on a main distribution line, usually the property line, to the point of connection with the customer's outlet or wiring. The life characteristics of Overhead and Underground Services are similar. The 1997 study combined the historical salvage and removal expense data for the overhead and underground services accounts to smooth the effects of reimbursements and relocations costs. This study also considered the two accounts together for analysis of net salvage.

The analysis also shows reduced gross salvage with fairly stable costs of removal in the five years since the last depreciation study. The year 2001 was the start of a transition from the old plant asset system to PowerPlant. As a result gross salvage and removal expense data may be somewhat skewed because of retirement processing and 2001 was disregarded in the net salvage analysis for this account. Xcel Energy recommends that the net salvage rate for overhead and underground services be changed from –25% to –30%.

IV. Description of and Reason for Gas Utility Average Life Depreciation Study

A. Background

The Gas Utility average life property consists of Transmission and Distribution property which serves over 421,000 customers located in parts of

Minnesota and North Dakota. Natural gas distributed and sold by Xcel Energy is now purchased from over 30 different gas suppliers for distribution in the Company's Minnesota service areas. This property includes approximately 8,600 miles of gas mains, of which approximately 30 miles are cast iron, 1,670 miles are steel, and 6,900 miles are plastic.

The current average service lives and net salvage rates for gas facilities have been reviewed by Company personnel. The analysis found all of the current average service lives to be appropriate except as discussed below.

B. Major Future Additions and Retirements

Xcel Energy does not anticipate at this time any major future addition or retirement in the Gas Utility plant accounts which would materially affect the depreciation rates recommended in this study. The absence of clearly identifiable major future additions or retirements means that ongoing future additions and retirements influence life and salvage estimates, but usually do not result in dramatic changes. Rather, these additions and retirements indicate gradual changes in the life characteristics of the equipment in the account. In those cases where ongoing additions and retirements are believed to influence the life and salvage estimates, these effects have been discussed in the individual account analyses.

C. Transmission

Gas Transmission is a FERC functional group of plant accounts which include the original cost of plant and equipment used primarily for transporting gas with a pressure of 200 to 350 pounds per square inch (psi) from a wholesale source to the main distribution area. The Xcel Energy investment in Gas Transmission property is solely to support the Company's Gas Distribution business areas.

The difference between the Distribution and Transmission designation is determined by the operating pressures of the gas and the location of the system. These differences do not weaken or shorten the life of the Transmission property and thus Transmission properties are assigned similar lives and salvage attributes as the Gas Distribution properties. Xcel Energy personnel reviewed all accounts. One life and one net salvage rate were recommended for change. The changes are stated here but additional reasons for the changes can be found under the similar Distribution account.

1. Change in Average Service Life

a. Structures and Improvements (FERC Account 366)

This account includes the original cost of structures and improvements used in connection with gas transmission operations. Measuring and regulating station structures associated with the gas transmission function are contained in this account.

FERC Account 366 has aged retirement data. When aged retirement data is available, actuarial analysis would normally be the preferred method to develop the necessary life tables in order to perform the analysis. With the scarcity of retirement data in FERC Account 366 the semi-actuarial method may be used to perform the life analysis. Actuarial life analysis may be used only on accounts with specific aged retirement data. SPR analysis, however, can be used for analysis on accounts that have either aged or un-aged retirement data.

The SPR analysis provided in Schedule D indicates that the best age fits are between 40 and 43 years. The distribution account, FERC Account 375, contains the same type of property as the transmission account. In support of the transmission life analysis, the SPR analysis of the distribution account has best age fits that range between 41 and 43 years. Xcel Energy recommends changing the average service life of FERC Account 366 from 35 to 41 years with an R5 dispersion.

2. Change in Net Salvage Rate

a. Measuring and Regulating Station Equipment (FERC Account 369)

These accounts include the installed cost of meters, gauges, and other equipment used in measuring or regulating gas in connection with transmission system operations. FERC Account 369 contains basically the same property as the distribution counterpart, FERC Account 378. The Company used the more extensive historical data of the distribution account in the analysis of appropriate net salvage rate. Xcel Energy recommends changing the net salvage rate from -10% to -20%.

D. Distribution

Gas Distribution is a FERC functional group of accounts which includes the original cost of plant and equipment used for distributing gas. These accounts include the cost of mains, structures, valves, regulators, measuring devices, and services. The system begins where the measuring and regulating equipment allow the gas into the Distribution system and ends with the house regulator and meter on the customer's premises.

The average service lives and net salvage rates as of Gas Distribution facilities have been reviewed by Company personnel. The analysis found all current data to be appropriate except as identified and discussed below.

1. Change in Average Service Life

   a. Structures and Improvements (FERC Account 375)

   This account includes the original cost of structures and improvements used in connection with gas distribution operations. Compressor station structures as well as measuring and regulating station structures associated with the gas distribution function are contained in this account.

   FERC Account 375 contains the same type of property as the transmission counterpart, FERC Account 366. The distribution account also does not have the level of aged retirements necessary for an actuarial analysis so the SPR method was used. The SPR analysis provided in Schedule D indicates that the best age fits are between 41 and 43 years. Xcel Energy recommends changing the average service life of FERC Account 375 from 35 to 41 years with an R5 dispersion.

2. Change in Net Salvage Rate

   a. Measuring and Regulating Station Equipment (FERC Account 378 and 379)

   These accounts include the installed cost of meters, gauges, regulators, odorizers, piping, and other equipment used for measuring and regulating gas pressure in connection with the Distribution system operations and with the receipt of gas at entry points to the Distribution system. The majority of these stations are underground.

The 10-year historical analysis of gross salvage and removal expense levels demonstrate a trend towards a higher negative net salvage. The year 2001 was the start of a transition from the old plant asset system to PowerPlant. As a result gross salvage and removal expense data may be somewhat skewed because of retirement processing and 2001 was disregarded in the net salvage analysis for this account. Xcel Energy recommends changing the net salvage percent from –10% to –20% for FERC Accounts 378 and 379.

b. Services - Metallic and Plastic (FERC Account 380)

These accounts include the installed cost of metallic and plastic service pipes and accessories leading to a customer's premises. A complete service begins with the connection at the main and extends to, but does not include, the connection with the customer's meter.

Removal expense has been traditionally high for gas services, metallic and plastic. Gross salvage has always been low because the piping, once cut and capped, is generally left in place. These two factors then combined into traditionally higher negative net salvage rates. First identified in the 1997 study, new ways to seal the service in the retirement process by using a rubber plug instead of a cap have shortened the process and reduced removal expense. This new retirement method and other efficiencies continue to put a downward trend on the negative net salvage for both metallic and plastic services. The 10-year historical analysis indicates that a rate of -30% is more appropriate for use on both metallic and plastic services. Xcel Energy recommends changing the net salvage rate from -50% to -30%.

V. Theoretical Depreciation Accumulated Analysis

An accumulated depreciation analysis involves a comparison of the actual accumulated depreciation balance (actual reserve) with a theoretical balance (theoretical reserve). A theoretical reserve is the amount calculated such that it and the annual accruals over the estimated remaining life of the property will exactly equal the original cost adjusted for net salvage. Thus, it is a prospective view of the status of the reserve as opposed to a retrospective view upon which the actual reserve has been accrued. It is calculated on a vintage basis for each account using the actual aged plant balances. A simulated aged distribution of the plant balances is used for mass property to produce proper aging.

It is common to have differences between the actual reserve and theoretical reserve for several reasons. A theoretical reserve is based upon estimated probability distributions of retirements that are described mathematically as smooth curves. Actual retirements deviate from these smooth curves and because these deviations affect the actual reserve, it is normal to expect that this will create a difference between the theoretical and actual reserve. It is normal to expect the future retirement pattern to deviate from the standard curve as well as the actual net salvage recorded to fluctuate around the estimated percent. Coupled with the fact that many of the new vintages, where much expansion resides, are relatively short curves, the likelihood that the precise standard curve will be produced by future retirements is remote. Thus, any difference between theoretical and actual could be mitigated through future deviations from the standard curves and the theoretical projection of reserve utilization.

Differences between the actual and theoretical reserve also result from periodic changes of the annual depreciation rates and estimated mortality dispersions. Any time a depreciation rate is changed and a new reserve study is made, the revised depreciation rate will have an impact on the theoretical reserve. For example, an increase in a rate will automatically increase the theoretical reserve from what it would have been without a change, even though retirements had conformed closely to those estimated at an earlier date. The theoretical reserves reflect the most recent opinions and estimates which have been actually used in the build-up of that reserve. Thus, deviations of the actual reserve from the theoretical reserve at various points in time are expected and should not necessarily be construed as a reserve excess or deficiency.

For these reasons, the theoretical reserve as a measure of reserve adequacy cannot be considered reliable or sufficient. A more meaningful measure of reserve behavior is the observation of trends in differences between the theoretical and actual reserve where the first reserve is based upon both the lives that have been used as well as those now being instituted. This kind of analysis indicates whether retirements are occurring in conformance with the probability distribution of retirements used in establishing the rates and in calculating the theoretical reserve.

In 1968, the actual reserve was redistributed to primary accounts in accordance with a theoretical reserve calculation. Since that time, the theoretical reserve studies have been made based upon rates in effect and the relationship between actual and theoretical reserve has been observed. The results indicate a general tendency of the actual reserve to exceed a theoretical reserve for the Electric and Common Utility plant. The actual reserve for the Gas Utility plant is slightly less than the theoretical reserve.

The ***Comparison of Actual and Theoretical Reserve*** (Schedule F) shows that the actual reserve at December 31, 2001, for Transmission, Distribution, and General

Structures and Improvements is approximately $1,191.3 million which is 37.1% of the original cost of the property. The difference between actual reserve and the theoretical reserve of $102.5 million is approximately 12 months of provision based on the proposed rates. In the five years since the last depreciation filing the actual and theoretical reserves have come closer together. In the 1997 study the difference between the two reserves was approximately 22 months of provisions based on the proposed rates.

It is our conclusion that the deviations and trends in the reserve analysis are acceptable for a study of this nature. Differences between the actual and theoretical depreciation reserve for some plant accounts are expected because over time there may have been several changes in the net salvage and mortality characteristics of the property within each account. Also, differences are attributed to the fact that actual retirements, salvage proceeds, and removal expenses will not follow a smooth curve pattern.

VI. Attached Schedules

The following schedules have been included for satisfaction of filing requirements and for additional support to the recommended changes:

Schedule	
A	Comparison of Present and Proposed Depreciation Rates
B	Comparison of Present and Proposed Accruals
C	Proposed Lives, Net Salvage Rates, and Depreciation Rates
D	Life Analysis, Simulated
E	Net Salvage Analysis
F	Comparison of Actual and Theoretical Reserve
G	Plant In Service
H	Accumulated Depreciation
I	Annual Depreciation Accrual Determination

VII. Conclusion

This filing proposes lengthening some lives and adjusting the estimated net salvage value to better reflect the recovery patterns for select accounts. The impact on annual depreciation expense for the new proposed rates will be an approximate decrease of $892,165. This is a net effect of lengthened lives and adjusted net salvage values. Xcel Energy requests the effective date for this change to be January 1, 2003.

VIII. Miscellaneous Information

A. Correspondence

All correspondence concerning this depreciation study should be sent to each of the following:

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B. Proprietary Information

The document, including all schedules, does not contain any proprietary information.

SCHEDULE A
COMPARISON OF PRESENT AND PROPOSED DEPRECIATION RATES

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Depreciation Rates

Schedule A

Electric Utility

FERC Acct	Account Description	Present Average Life	Present Curve	Present Net Salvage	Present Annual Rate	Proposed Average Life	Proposed Curve	Proposed Net Salvage	Proposed Annual Rate	Annual Rate Percent Change
Transmission										
352	Structures and Improvements	45	S1	0	2.22	45	S1	0	2.22	0.00
353	Station Equipment	38	SC	0	2.63	38	SC	0	2.63	0.00
354	Towers and Fixtures	46	L1.5	-25	2.72	46	L1.5	-25	2.72	0.00
355	Poles and Fixtures	38	R1.5	-10	2.89	38	R1.5	-10	2.89	0.00
356	Overhead Conductors and Devices	42	L1	-30	3.10	42	L1	-30	3.10	0.00
357	Underground Conduit	55	L1.5	0	1.82	55	L1.5	0	1.82	0.00
358	Underground Conductor and Devices	40	L1	0	2.50	40	L1	0	2.50	0.00
Distribution										
361	Structures and Improvements	45	R1	-30	2.89	45	R1	-30	2.89	0.00
362	Station Equipment	38	R1	-10	2.89	38	R1	-10	2.89	0.00
364	Poles, Towers, and Fixtures	40	R1.5	-90	4.75	40	R1.5	-90	4.75	0.00
365	Overhead Conductors and Devices	32	L1.5	-20	3.75	35	R1	-30	3.71	-0.04
366	Underground Conduit	47	R3	0	2.13	47	R3	0	2.13	0.00
367	Underground Conductor and Devices	38	S1	20	2.11	38	S1	20	2.11	0.00
369	Overhead Services	40	R2.5	-25	3.13	40	R2.5	-30	3.25	0.13
369	Underground Services	40	R2.5	-25	3.13	40	R2.5	-30	3.25	0.13
373	Street Lighting and Signal Systems	18	L5	-20	6.67	18	L5	-20	6.67	0.00
General										
390	Structures and Improvements	45	R1	0	2.22	45	R1	0	2.22	

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Depreciation Rates

Schedule A

Gas Utility

FERC Acct	Account Description	Present Average Life	Present Curve	Present Net Salvage	Present Annual Rate	Proposed Average Life	Proposed Curve	Proposed Net Salvage	Proposed Annual Rate	Annual Rate Percent Change
Transmission										
366	Structures and Improvements	35	R2	0	2.86	41	R5	0	2.44	-0.42
367	Mains	45	R1.5	-30	2.89	45	R1.5	-30	2.89	0.00
369	Measure and Regulating Station	31	S0.5	-10	3.55	31	S0.5	-20	3.87	0.32
Distribution										
375	Structures and Improvements	35	R2	0	2.86	41	R5	0	2.44	-0.42
376	Mains - Metallic	45	R1.5	-30	2.89	45	R1.5	-30	2.89	0.00
376	Mains - Plastic	45	R3	-15	2.56	45	R3	-15	2.56	0.00
378	Measure & Regulating - General	31	S0.5	-10	3.55	31	S0.5	-20	3.87	0.32
379	Measure & Regulating - City Gate	31	S0.5	-10	3.55	31	S0.5	-20	3.87	0.32
380	Services - Metallic	40	S3	-50	3.75	40	S3	-30	3.25	-0.50
380	Service - Plastic	40	R3	-50	3.75	40	R3	-30	3.25	-0.50
General										
390	Structures and Improvements	45	R1	0	2.22	45	R1	0	2.22	0.00

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Depreciation Rates

Schedule A

Common Utility

FERC Acct	Account Description	Present Average Life	Present Curve	Present Net Salvage	Present Annual Rate	Proposed Average Life	Proposed Curve	Proposed Net Salvage	Proposed Annual Rate	Annual Rate Percent Change
General										
390	Structures and Improvements	45	R1	0	2.22	45	R1	0	2.22	0.00
390	Structures and Improvements - Leased	5.5		0	18.18	5.5		0	18.18	0.00

SCHEDULE B
COMPARISON OF PRESENT AND PROPOSED ACCRUALS

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Accruals

Schedule B

Electric Utility

FERC Acct	Account Description	Plant Balance 1/1/2003	Present Annual Rate	Present Annual Accrual	Proposed Annual Rate	Proposed Annual Accrual	Proposed Less Present Accrual
Transmission							
352	Structures and Improvements	16,024,428	2.22	356,098	2.22	356,098	-
353	Station Equipment	409,032,781	2.63	10,764,021	2.63	10,764,021	-
354	Towers and Fixtures	95,703,366	2.72	2,600,635	2.72	2,600,635	-
355	Poles and Fixtures	155,176,023	2.89	4,491,937	2.89	4,491,937	-
356	Overhead Conductors and Devices	150,813,328	3.10	4,668,032	3.10	4,668,032	-
357	Underground Conduit	5,834,658	1.82	106,085	1.82	106,085	-
358	Underground Conductor and Devices	8,494,161	2.50	212,354	2.50	212,354	-
	Transmission Total	841,078,745		23,199,162		23,199,162	-
Distribution							
361	Structures and Improvements	28,761,068	2.89	830,875	2.89	830,875	-
362	Station Equipment	359,286,347	2.89	10,400,394	2.89	10,400,394	-
364	Poles, Towers, and Fixtures	209,673,296	4.75	9,959,482	4.75	9,959,482	-
365	Overhead Conductors and Devices	248,405,289	3.75	9,315,198	3.71	9,226,482	(88,716)
366	Underground Conduit	132,285,964	2.13	2,814,595	2.13	2,814,595	-
367	Underground Conductor and Devices	616,985,888	2.11	12,989,177	2.11	12,989,177	-
369	Overhead Services	62,957,534	3.13	1,967,423	3.25	2,046,120	78,697
369	Underground Services	146,184,826	3.13	4,568,276	3.25	4,751,007	182,731
373	Street Lighting and Signal Systems	39,190,745	6.67	2,612,716	6.67	2,612,716	-
	Distribution Total	1,843,730,957		55,458,136		55,630,848	172,712
General							
390	Structures and Improvements	51,753,048	2.22	1,150,068	2.22	1,150,068	
	General Total	51,753,048		1,150,068		1,150,068	
	Electric Utility Total	2,736,562,750		79,807,366		79,980,077	172,712

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Accruals

Schedule B

Gas Utility

FERC Acct	Account Description	Plant Balance 1/1/2003	Present Annual Rate	Present Annual Accrual	Proposed Annual Rate	Proposed Annual Accrual	Proposed Less Present Accrual
Transmission							
366	Structures and Improvements	761,733	2.86	21,764	2.44	18,579	(3,185)
367	Mains	20,713,011	2.89	598,376	2.89	598,376	-
369	Measure and Regulating Station	4,164,479	3.55	147,772	3.87	161,206	13,434
	Transmission Total	25,639,223		767,912		778,160	10,249
Distribution							
375	Structures and Improvements	180,644	2.86	5,161	2.44	4,406	(755)
376	Mains - Metallic	79,539,987	2.89	2,297,822	2.89	2,297,822	-
376	Mains - Plastic	218,211,820	2.56	5,576,524	2.56	5,576,524	-
378	Measure & Regulating - General	5,593,938	3.55	198,495	3.87	216,540	18,045
379	Measure & Regulating - City Gate	140,859	3.55	4,998	3.87	5,453	454
380	Services - Metallic	14,991,717	3.75	562,189	3.25	487,231	(74,959)
380	Service - Plastic	203,582,207	3.75	7,634,333	3.25	6,616,422	(1,017,911)
	Distribution Total	522,241,172		16,279,522		15,204,397	(1,075,126)
General							
390	Structures and Improvements	859,780	2.22	19,106	2.22	19,106	-
	General Total	859,780		19,106		19,106	-
	Gas Utility Total	548,740,175		17,066,540		16,001,663	(1,064,877)

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Accruals

Schedule B

Common Utility

FERC Acct	Account Description	Plant Balance 1/1/2003	Present Annual Rate	Present Annual Accrual	Proposed Annual Rate	Proposed Annual Accrual	Proposed Less Present Accrual
General							
390	Structures and Improvements	57,330,799	2.22	1,274,018	2.22	1,274,018	-
390	Structures and Improvements - Leased	6,685,747	18.18	1,215,590	18.18	1,215,590	-
	General Total	64,016,546		2,489,608		2,489,608	-
	Common Utility Total	64,016,546		2,489,608		2,489,608	-
	Grand Total	3,349,319,472		99,363,514		98,471,349	(892,165)

SCHEDULE C

PROPOSED LIVES, NET SALVAGE RATES, AND DEPRECIATION RATES

NORTHERN STATES POWER COMPANY **Schedule C**

Proposed Lives, Net Salvage Rates, and Depreciation Rates

Electric Utility

FERC Acct	Account Description	Proposed Average Life	Proposed Net Salvage	Proposed Annual Rate
Transmission				
352	Structures and Improvements	45	0	2.22
353	Station Equipment	38	0	2.63
354	Towers and Fixtures	46	-25	2.72
355	Poles and Fixtures	38	-10	2.89
356	Overhead Conductors and Devices	42	-30	3.10
357	Underground Conduit	55	0	1.82
358	Underground Conductor and Devices	40	0	2.50
Distribution				
361	Structures and Improvements	45	-30	2.89
362	Station Equipment	38	-10	2.89
364	Poles, Towers, and Fixtures	40	-90	4.75
365	Overhead Conductors and Devices	35	-30	3.71
366	Underground Conduit	47	0	2.13
367	Underground Conductor and Devices	38	20	2.11
369	Overhead Services	40	-30	3.25
369	Underground Services	40	-30	3.25
373	Street Lighting and Signal Systems	18	-20	6.67
General				
390	Structures and Improvements	45	0	2.22

NORTHERN STATES POWER COMPANY **Schedule C**

Proposed Lives, Net Salvage Rates, and Depreciation Rates

Gas Utility

FERC Acct	Account Description	Proposed Average Life	Proposed Net Salvage	Proposed Annual Rate
Transmission				
366	Structures and Improvements	41	0	2.44
367	Mains	45	-30	2.89
369	Measure and Regulating Station	31	-20	3.87
Distribution				
375	Structures and Improvements	41	0	2.44
376	Mains - Metallic	45	-30	2.89
376	Mains - Plastic	45	-15	2.56
378	Measure & Regulating - General	31	-20	3.87
379	Measure & Regulating - City Gate	31	-20	3.87
380	Services - Metallic	40	-30	3.25
380	Service - Plastic	40	-30	3.25
General				
390	Structures and Improvements	45	0	2.22

NORTHERN STATES POWER COMPANY **Schedule C**

Proposed Lives, Net Salvage Rates, and Depreciation Rates

Common Utility

FERC Acct	Account Description	Proposed Average Life	Proposed Net Salvage	Proposed Annual Rate
General Plant				
390	Structures and Improvements	45	0	2.22
390	Structures and Improvements - Leased	5.5	0	18.18

SCHEDULE D
LIFE ANALYSIS, SIMULATED

Account: MN03-365000-OH Conductors
Version: S1
Method: Simulated Balances

No. of Test Points: 91 **Interval: 0** **Observation Band: 1911 - 2001**

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Retirement Experience Index
O4	78.5	5.30E+14	46	72.07
O3	59.3	5.62E+14	47	78.57
O2	44.3	6.42E+14	50	100.00
SC	40.0	6.70E+14	52	100.00
L0	40.0	7.16E+14	53	100.00
R0.5	37.1	7.76E+14	56	100.00
S-.5	36.8	7.87E+14	56	100.00
L0.5	37.2	8.08E+14	57	100.00
R1	34.5	8.92E+14	60	100.00
L1	35.0	9.01E+14	60	100.00
S0	34.3	9.03E+14	60	100.00
S0.5	32.8	1.01E+15	63	100.00
L1.5	33.5	1.02E+15	64	100.00
R1.5	33.0	1.02E+15	64	100.00
S1	31.6	1.12E+15	67	100.00
L2	32.3	1.13E+15	67	100.00
R2	31.5	1.18E+15	69	100.00
S1.5	30.8	1.25E+15	71	100.00
R2.5	30.8	1.35E+15	73	100.00
S2	30.4	1.38E+15	74	100.00
L3	30.4	1.39E+15	75	100.00
R3	30.3	1.53E+15	78	100.00
S3	29.6	1.64E+15	81	100.00
L4	29.3	1.72E+15	83	100.00
R4	29.2	1.82E+15	85	100.00
S4	28.9	1.93E+15	88	100.00
L5	28.9	1.99E+15	89	100.00
R5	28.8	2.10E+15	92	100.00
S5	28.7	2.16E+15	93	100.00
S6	28.6	2.31E+15	96	100.00
SQ	31.1	3.35E+15	116	100.00

Simulated Plant Record Analysis
Northern States Power-Minnesota

Account: MN07-366000-Str & Impr
Version: S1
Method: Simulated Balances

No. of Test Points: 69 **Interval: 0** **Observation Band: 1933 - 2001**

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Retirement Experience Index
O4	272.6	2.19E+09	24	26.85
O3	197.8	2.19E+09	24	27.23
SC	121.7	2.19E+09	24	28.15
O2	137.2	2.19E+09	24	27.98
R0.5	98.6	2.20E+09	24	30.91
S-.5	90.9	2.24E+09	24	35.42
R1	77.8	2.25E+09	24	38.58
L0	98.7	2.28E+09	25	37.29
R1.5	65.2	2.38E+09	25	51.05
L0.5	81.9	2.43E+09	25	44.45
S0	69.6	2.53E+09	26	48.88
R2	55.5	2.75E+09	27	71.03
L1	69.3	2.78E+09	27	53.57
S0.5	61.1	2.82E+09	27	59.70
L1.5	61.4	3.13E+09	29	63.39
R2.5	50.7	3.29E+09	30	86.93
S1	54.6	3.40E+09	30	72.15
L2	54.4	3.76E+09	32	74.44
S1.5	50.9	3.85E+09	32	82.48
R3	46.7	4.24E+09	34	97.56
S2	47.4	4.56E+09	35	92.04
L3	47.2	5.01E+09	37	89.05
S3	44.1	5.69E+09	39	99.10
R4	43.1	6.07E+09	41	100.00
L4	43.1	6.41E+09	42	98.64
S4	41.5	7.17E+09	44	100.00
L5	41.6	7.72E+09	46	99.96
R5	40.7	8.07E+09	47	100.00
S5	40.8	8.74E+09	49	100.00
S6	40.6	9.73E+09	51	100.00
SQ	42.9	1.39E+10	61	100.00

Account: MN08-375000-Str & Impr
Version: S1
Method: Simulated Balances

No. of Test Points: 65 Interval: 0 Observation Band: 1936 - 2000

Dispersion	Avg Service Life	Sum of Squared Differences	Index of Variation	Retirement Experience Index
S6	41.2	7.50E+07	26	100.00
S5	41.4	1.13E+08	32	100.00
R5	41.1	1.30E+08	34	100.00
SQ	43.1	1.41E+08	35	100.00
L5	41.7	1.42E+08	36	99.74
S4	41.6	1.74E+08	39	99.97
L4	42.8	2.04E+08	43	97.22
R4	41.3	2.04E+08	43	100.00
S3	42.7	2.48E+08	47	98.46
R3	42.8	2.68E+08	49	98.66
L3	45.5	2.85E+08	51	87.66
R2.5	45.3	2.91E+08	51	91.97
S2	44.2	3.12E+08	53	92.72
R2	48.6	3.13E+08	53	80.13
R1.5	54.9	3.22E+08	54	62.67
R1	63.2	3.29E+08	54	48.63
SC	95.6	3.30E+08	54	33.72
O2	107.2	3.30E+08	54	33.70
O3	154.6	3.30E+08	54	32.35
R0.5	77.7	3.30E+08	54	38.38
O4	213.1	3.30E+08	54	31.69
S1.5	45.8	3.37E+08	55	86.72
S-.5	72.8	3.42E+08	55	43.17
L2	49.9	3.47E+08	56	76.38
L1.5	54.1	3.59E+08	57	68.35
L0.5	68.2	3.64E+08	57	51.39
S1	48.4	3.64E+08	57	78.25
L0	79.4	3.66E+08	57	44.44
S0.5	52.5	3.66E+08	57	67.91
S0	58.1	3.74E+08	58	57.66
L1	59.9	3.75E+08	58	59.41

SCHEDULE E
NET SALVAGE ANALYSIS

Net Salvage Analysis Report

MN03-365000-OH Conductors

Year	Retirements	Gross Salvage Amount	Gross Salvage Pct.	Gross Salvage 10 - Yr Avg	Cost of Removal Amount	Cost of Removal Pct.	Cost of Removal 10 - Yr Avg	Net Salvage Amount	Net Salvage Pct.	Net Salvage 10 - Yr Avg
1942	$68,220.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1943	$31,303.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1944	$23,291.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1945	$51,151.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1946	$96,723.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1947	$127,935.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1948	$153,496.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1949	$502,441.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1950	$311,231.00	$188,324.00	60.51		$74,502.00	23.94		$113,822.00	36.57	
1951	$321,364.00	$190,799.00	59.37	22.47	$81,674.00	25.41	9.26	$109,125.00	33.96	13.21
1952	$390,977.00	$245,915.00	62.90	31.10	$97,882.00	25.04	12.64	$148,033.00	37.86	18.46
1953	$376,791.00	$295,560.00	78.44	39.08	$105,941.00	28.12	15.28	$189,619.00	50.32	23.80
1954	$396,215.00	$338,733.00	85.49	46.16	$110,064.00	27.78	17.23	$228,669.00	57.71	28.93
1955	$425,512.00	$351,830.00	82.68	51.93	$93,288.00	21.92	18.16	$258,542.00	60.76	33.77
1956	$491,978.00	$369,139.00	75.03	56.61	$118,549.00	24.10	19.49	$250,590.00	50.94	37.12
1957	$684,494.00	$393,508.00	57.49	58.55	$138,560.00	20.24	20.24	$254,948.00	37.25	38.31
1958	$615,131.00	$369,685.00	60.10	60.75	$136,084.00	22.12	21.18	$233,601.00	37.98	39.57
1959	$563,107.00	$397,873.00	70.66	68.64	$137,600.00	24.44	23.91	$260,273.00	46.22	44.73
1960	$605,124.00	$371,815.00	61.44	68.26	$150,747.00	24.91	24.03	$221,068.00	36.53	44.23
1961	$612,283.00	$344,925.00	56.33	67.40	$155,362.00	25.37	24.10	$189,563.00	30.96	43.30
1962	$913,571.00	$479,590.00	52.50	65.32	$221,981.00	24.30	24.07	$257,609.00	28.20	41.25
1963	$777,890.00	$371,578.00	47.77	62.26	$195,240.00	25.10	23.95	$176,338.00	22.67	38.31
1964	$790,038.00	$374,700.00	47.43	59.03	$205,126.00	25.96	23.96	$169,574.00	21.46	35.07
1965	$1,086,662.00	$442,064.00	40.68	54.83	$273,496.00	25.17	24.27	$168,568.00	15.51	30.56
1966	$1,181,692.00	$526,799.00	44.58	52.01	$229,649.00	19.43	23.55	$297,150.00	25.15	28.46
1967	$1,131,512.00	$462,766.00	40.90	50.04	$264,397.00	23.37	23.80	$198,369.00	17.53	26.24
1968	$1,364,210.00	$588,198.00	43.12	48.31	$306,146.00	22.44	23.71	$282,052.00	20.68	24.60

Net Salvage Analysis Report

MN03-365000-OH Conductors

		Gross Salvage			Cost of Removal			Net Salvage		
Year	Retirements	Amount	Pct.	10 - Yr Avg	Amount	Pct.	10 - Yr Avg	Amount	Pct.	10 - Yr Avg
1969	$1,533,663.00	$608,005.00	39.64	45.72	$330,668.00	21.56	23.34	$277,337.00	18.08	22.38
1970	$1,540,399.00	$676,390.00	43.91	44.59	$344,155.00	22.34	23.11	$332,235.00	21.57	21.49
1971	$1,115,794.00	$432,839.00	38.79	43.40	$241,627.00	21.66	22.85	$191,212.00	17.14	20.55
1972	$1,148,405.00	$511,359.00	44.53	42.80	$277,138.00	24.13	22.86	$234,221.00	20.40	19.94
1973	$1,094,044.00	$551,011.00	50.36	43.17	$272,272.00	24.89	22.90	$278,739.00	25.48	20.27
1974	$1,186,378.00	$982,553.00	82.82	46.69	$296,225.00	24.97	22.90	$686,328.00	57.85	23.79
1975	$1,001,179.00	$727,041.00	72.62	49.34	$334,658.00	33.43	23.56	$392,383.00	39.19	25.78
1976	$1,139,105.00	$746,008.00	65.49	51.30	$404,527.00	35.51	25.07	$341,481.00	29.98	26.23
1977	$1,052,882.00	$727,239.00	69.07	53.80	$531,781.00	50.51	27.42	$195,458.00	18.56	26.38
1978	$1,036,168.00	$617,860.00	59.63	55.54	$529,372.00	51.09	30.07	$88,488.00	8.54	25.47
1979	$1,217,414.00	$1,089,903.00	89.53	61.24	$581,581.00	47.77	33.07	$508,322.00	41.75	28.17
1980	$1,206,570.00	$1,215,879.00	100.77	67.88	$812,525.00	67.34	38.24	$403,354.00	33.43	29.65
1981	$1,348,144.00	$813,255.00	60.32	69.83	$1,023,266.00	75.90	44.30	($210,011.00)	-15.58	25.54
1982	$1,184,273.00	$891,439.00	75.27	72.93	$861,742.00	72.77	49.26	$29,697.00	2.51	23.67
1983	$983,821.00	$705,168.00	71.68	74.99	$719,722.00	73.16	53.68	($14,554.00)	-1.48	21.32
1984	$1,142,514.00	$1,223,869.00	107.12	77.42	$923,090.00	80.79	59.43	$300,779.00	26.33	17.99
1985	$1,287,338.00	$1,219,214.00	94.71	79.75	$1,018,726.00	79.13	63.86	$200,488.00	15.57	15.89
1986	$1,006,210.00	$1,104,204.00	109.74	83.80	$886,423.00	88.10	68.80	$217,781.00	21.64	15.00
1987	$1,271,033.00	$874,009.00	68.76	83.49	$991,850.00	78.04	71.45	($117,841.00)	-9.27	12.04
1988	$1,102,260.00	$1,250,157.00	113.42	88.40	$893,030.00	81.02	74.15	$357,127.00	32.40	14.26
1989	$1,364,652.00	$814,344.00	59.67	84.99	$1,001,622.00	73.40	76.76	($187,278.00)	-13.72	8.23
1990	$1,518,591.00	$763,122.00	50.25	79.11	$968,484.00	63.78	76.08	($205,362.00)	-13.52	3.04
1991	$1,373,240.00	$516,756.00	37.63	76.53	$1,100,444.00	80.13	76.55	($583,688.00)	-42.50	-0.02
1992	$2,644,759.00	$478,960.00	18.11	65.35	$1,670,950.00	63.18	74.30	($1,191,990.00)	-45.07	-8.94
1993	$2,405,576.00	$323,269.00	13.44	56.68	$1,490,514.00	61.96	72.41	($1,167,245.00)	-48.52	-15.73
1994	$1,906,308.00	$382,459.00	20.06	48.66	$1,138,160.00	59.70	70.28	($755,701.00)	-39.64	-21.62
1995	$1,999,112.00	$736,309.00	36.83	43.66	$1,327,071.00	66.38	69.12	($590,762.00)	-29.55	-25.46

Net Salvage Analysis Report

MN03-365000-OH Conductors

		Gross Salvage			Cost of Removal			Net Salvage		
Year	Retirements	Amount	Pct.	10 - Yr Avg	Amount	Pct.	10 - Yr Avg	Amount	Pct.	10 - Yr Avg
1996	$2,458,589.00	$603,448.00	24.54	37.37	$1,311,527.00	53.34	65.91	($708,079.00)	-28.80	-28.55
1997	$2,231,917.00	$560,259.00	25.10	33.83	$1,303,589.00	58.41	64.22	($743,330.00)	-33.30	-30.39
1998	$2,976,280.00	$751,165.00	25.24	28.40	$1,692,351.00	56.86	62.29	($941,186.00)	-31.62	-33.88
1999	$3,519,349.00	$1,165,780.00	33.12	27.27	$2,105,564.00	59.83	61.25	($939,784.00)	-26.70	-33.98
2000	$3,583,144.00	$599,171.00	16.72	24.37	$1,853,315.00	51.72	59.74	($1,254,144.00)	-35.00	-35.36
2001	$2,245,746.94	$186,079.51	8.29	22.28	$1,521,713.46	67.76	59.35	($1,335,633.95)	-59.47	-37.07
	$67,919,199.94	$31,952,324.51	47.04		$33,855,970.46	49.85		($1,903,645.95)	-2.80	

Net Salvage Analysis Report

MN03-369-OH and UG Service

Year	Retirements	Gross Salvage Amount	Gross Salvage Pct.	Gross Salvage 10 - Yr Avg	Cost of Removal Amount	Cost of Removal Pct.	Cost of Removal 10 - Yr Avg	Net Salvage Amount	Net Salvage Pct.	Net Salvage 10 - Yr Avg
1955	$93,850.00	$44,068.00	46.96		$41,401.00	44.11		$2,667.00	2.84	
1956	$119,927.00	$60,182.00	50.18		$52,330.00	43.63		$7,852.00	6.55	
1957	$150,001.00	$53,514.00	35.68		$63,107.00	42.07		($9,593.00)	-6.40	
1958	$177,198.00	$39,972.00	22.56		$76,539.00	43.19		($36,567.00)	-20.64	
1959	$167,882.00	$43,153.00	25.70		$78,309.00	46.65		($35,156.00)	-20.94	
1960	$168,111.00	$50,235.00	29.88		$82,908.00	49.32		($32,673.00)	-19.44	
1961	$165,701.00	$44,446.00	26.82		$83,535.00	50.41		($39,089.00)	-23.59	
1962	$229,274.00	$61,503.00	26.83		$100,337.00	43.76		($38,834.00)	-16.94	
1963	$199,919.00	$49,547.00	24.78		$90,344.00	45.19		($40,797.00)	-20.41	
1964	$188,865.00	$53,320.00	28.23	30.10	$95,879.00	50.77	46.05	($42,559.00)	-22.53	-15.94
1965	$194,178.00	$53,216.00	27.41	28.91	$96,462.00	49.68	46.55	($43,246.00)	-22.27	-17.64
1966	$189,839.00	$77,054.00	40.59	28.73	$113,521.00	59.80	48.11	($36,467.00)	-19.21	-19.39
1967	$205,971.00	$70,291.00	34.13	28.76	$141,052.00	68.48	50.82	($70,761.00)	-34.35	-22.06
1968	$188,489.00	$77,731.00	41.24	30.58	$145,742.00	77.32	54.16	($68,011.00)	-36.08	-23.58
1969	$215,828.00	$79,641.00	36.90	31.70	$176,224.00	81.65	57.86	($96,583.00)	-44.75	-26.15
1970	$206,375.00	$83,915.00	40.66	32.79	$173,043.00	83.85	61.28	($89,128.00)	-43.19	-28.50
1971	$242,269.00	$66,406.00	27.41	32.64	$196,308.00	81.03	64.48	($129,902.00)	-53.62	-31.84
1972	$226,214.00	$68,822.00	30.42	33.04	$201,116.00	88.91	69.47	($132,294.00)	-58.48	-36.43
1973	$226,498.00	$78,651.00	34.72	34.01	$187,407.00	82.74	73.24	($108,756.00)	-48.02	-39.23
1974	$299,932.00	$123,544.00	41.19	35.49	$195,683.00	65.24	74.08	($72,139.00)	-24.05	-38.59
1975	$282,695.00	$107,746.00	38.11	36.50	$211,480.00	74.81	76.25	($103,734.00)	-36.69	-39.74
1976	$326,641.00	$83,725.00	25.63	34.72	$201,857.00	61.80	75.59	($118,132.00)	-36.17	-40.87
1977	$376,396.00	$83,874.00	22.28	32.96	$212,324.00	56.41	73.37	($128,450.00)	-34.13	-40.41
1978	$393,410.00	$72,992.00	18.55	30.37	$334,079.00	84.92	74.73	($261,087.00)	-66.37	-44.35
1979	$465,640.00	$100,076.00	21.49	28.55	$489,641.00	105.15	78.89	($389,565.00)	-83.66	-50.33
1980	$453,687.00	$158,451.00	34.93	28.67	$565,863.00	124.73	84.89	($407,412.00)	-89.80	-56.22
1981	$500,567.00	$482,173.00	96.33	38.29	$549,994.00	109.87	88.67	($67,821.00)	-13.55	-50.38

Net Salvage Analysis Report

MN03-369-OH and UG Service

		Gross Salvage			Cost of Removal			Net Salvage		
Year	Retirements	Amount	Pct.	10 - Yr Avg	Amount	Pct.	10 - Yr Avg	Amount	Pct.	10 - Yr Avg
1982	$418,884.00	$159,586.00	38.10	38.75	$409,759.00	97.82	89.68	($250,173.00)	-59.72	-50.94
1983	$407,914.00	$167,536.00	41.07	39.22	$300,514.00	73.67	88.42	($132,978.00)	-32.60	-49.20
1984	$355,795.00	$434,673.00	122.17	46.48	$364,806.00	102.53	91.43	$69,867.00	19.64	-44.94
1985	$439,190.00	$375,832.00	85.57	51.20	$468,945.00	106.78	94.19	($93,113.00)	-21.20	-42.99
1986	$388,004.00	$443,069.00	114.19	59.01	$410,270.00	105.74	97.78	$32,799.00	8.45	-38.77
1987	$349,869.00	$321,082.00	91.77	65.07	$389,905.00	111.44	102.66	($68,823.00)	-19.67	-37.58
1988	$377,581.00	$512,812.00	135.82	75.90	$381,433.00	101.02	104.19	$131,379.00	34.79	-28.28
1989	$486,577.00	$167,994.00	34.53	77.15	$378,928.00	77.88	101.01	($210,934.00)	-43.35	-23.87
1990	$483,742.00	$586,418.00	121.23	86.76	$350,308.00	72.42	95.17	$236,110.00	48.81	-8.40
1991	$462,410.00	$500,861.00	108.32	88.01	$340,729.00	73.69	91.02	$160,132.00	34.63	-3.02
1992	$839,247.00	$207,282.00	24.70	80.99	$431,380.00	51.40	83.16	($224,098.00)	-26.70	-2.17
1993	$578,687.00	$141,216.00	24.40	77.53	$379,289.00	65.54	81.83	($238,073.00)	-41.14	-4.30
1994	$337,499.00	$164,692.00	48.80	72.14	$353,905.00	104.86	81.92	($189,213.00)	-56.06	-9.78
1995	$384,479.00	$202,361.00	52.63	69.28	$352,929.00	91.79	80.40	($150,568.00)	-39.16	-11.12
1996	$539,983.00	$261,971.00	48.51	63.36	$370,402.00	68.60	77.05	($108,431.00)	-20.08	-13.69
1997	$328,985.00	$387,946.00	117.92	65.02	$284,203.00	86.39	75.19	$103,743.00	31.53	-10.17
1998	$595,502.00	$116,869.00	19.63	54.35	$428,801.00	72.01	72.88	($311,932.00)	-52.38	-18.53
1999	$479,370.00	$134,599.00	28.08	53.76	$358,517.00	74.79	72.58	($223,918.00)	-46.71	-18.81
2000	$486,125.00	$109,727.00	22.57	44.26	$364,486.00	74.98	72.82	($254,759.00)	-52.41	-28.56
2001	$398,287.76	$13,751.17	3.45	35.03	$433,018.70	108.72	75.62	($419,267.53)	-105.27	-40.59
	$15,793,487.76	$7,778,525.17	49.25		$12,509,012.70	79.20		($4,730,487.53)	-29.95	

Net Salvage Analysis Report

MN08-378 and 379-Regulating Eq

Year	Retirements	Gross Salvage Amount	Gross Salvage Pct.	Gross Salvage 10 - Yr Avg	Cost of Removal Amount	Cost of Removal Pct.	Cost of Removal 10 - Yr Avg	Net Salvage Amount	Net Salvage Pct.	Net Salvage 10 - Yr Avg
1949	$9,297.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1950	$793.00	$70.00	8.83		$58.00	7.31		$12.00	1.51	
1951	$341.00	$211.00	61.88		$43.00	12.61		$168.00	49.27	
1952	$21,476.00	$1,464.00	6.82		$2,474.00	11.52		($1,010.00)	-4.70	
1953	$5,715.00	($235.00)	-4.11		$1,000.00	17.50		($1,235.00)	-21.61	
1954	$3,166.00	$242.00	7.64		$135.00	4.26		$107.00	3.38	
1955	$860.00	$690.00	80.23		$97.00	11.28		$593.00	68.95	
1956	$9,293.00	$3,965.00	42.67		$601.00	6.47		$3,364.00	36.20	
1957	$40,475.00	$5,073.00	12.53		$2,388.00	5.90		$2,685.00	6.63	
1958	$751.00	$1,573.00	209.45	14.16	$510.00	67.91	7.93	$1,063.00	141.54	6.24
1959	$19,837.00	$2,483.00	12.52	15.13	$2,045.00	10.31	9.10	$438.00	2.21	6.02
1960	$46,004.00	$5,753.00	12.51	14.35	$2,369.00	5.15	7.88	$3,384.00	7.36	6.46
1961	$15,591.00	$5,412.00	34.71	16.19	$1,827.00	11.72	8.24	$3,585.00	22.99	7.95
1962	$22,040.00	$828.00	3.76	15.75	$2,311.00	10.49	8.11	($1,483.00)	-6.73	7.64
1963	$61,100.00	$4,398.00	7.20	13.88	$2,126.00	3.48	6.58	$2,272.00	3.72	7.31
1964	$8,807.00	$746.00	8.47	13.76	$528.00	6.00	6.59	$218.00	2.48	7.17
1965	$16,512.00	$831.00	5.03	12.92	$2,442.00	14.79	7.13	($1,611.00)	-9.76	5.79
1966	$15,499.00	$2,805.00	18.10	12.12	$1,257.00	8.11	7.22	$1,548.00	9.99	4.91
1967	$9,737.00	$962.00	9.88	11.95	$494.00	5.07	7.37	$468.00	4.81	4.58
1968	$32,546.00	$2,020.00	6.21	10.59	$5,436.00	16.70	8.41	($3,416.00)	-10.50	2.18
1969	$17,565.00	$3,286.00	18.71	11.02	$1,476.00	8.40	8.26	$1,810.00	10.30	2.76
1970	$18,101.00	$16,395.00	90.58	17.33	$9,504.00	52.51	12.60	$6,891.00	38.07	4.73
1971	$10,939.00	$7,019.00	64.16	18.46	$2,502.00	22.87	13.19	$4,517.00	41.29	5.27
1972	$19,911.00	$4,666.00	23.43	20.47	$3,624.00	18.20	13.95	$1,042.00	5.23	6.52
1973	$23,660.00	$3,442.00	14.55	24.34	$2,002.00	8.46	16.89	$1,440.00	6.09	7.45
1974	$6,786.00	$2,989.00	44.05	25.93	$1,725.00	25.42	17.79	$1,264.00	18.63	8.15
1975	$21,180.00	($188.00)	-0.89	24.67	$8,082.00	38.16	20.52	($8,270.00)	-39.05	4.15

Net Salvage Analysis Report

MN08-378 and 379-Regulating Eq

		Gross Salvage			Cost of Removal			Net Salvage		
Year	Retirements	Amount	Pct.	10 - Yr Avg	Amount	Pct.	10 - Yr Avg	Amount	Pct.	10 - Yr Avg
1976	$34,435.00	$4,636.00	13.46	23.21	$16,426.00	47.70	26.31	($11,790.00)	-34.24	-3.10
1977	$3,530.00	$2,572.00	72.86	24.83	$89.00	2.52	26.96	$2,483.00	70.34	-2.14
1978	$98,545.00	$3,146.00	3.19	18.83	$19,089.00	19.37	25.34	($15,943.00)	-16.18	-6.50
1979	$84,055.00	$9,160.00	10.90	16.76	$7,835.00	9.32	22.07	$1,325.00	1.58	-5.31
1980	$28,236.00	$1,196.00	4.24	11.66	$10,892.00	38.57	21.81	($9,696.00)	-34.34	-10.15
1981	$107,307.00	$592.00	0.55	7.53	$11,794.00	10.99	19.07	($11,202.00)	-10.44	-11.54
1982	$111,108.00	$12,783.00	11.51	7.77	$9,841.00	8.86	16.92	$2,942.00	2.65	-9.14
1983	$58,306.00	$44,873.00	76.96	14.77	$11,598.00	19.89	17.59	$33,275.00	57.07	-2.82
1984	$110,686.00	$14,488.00	13.09	14.19	$8,070.00	7.29	15.78	$6,418.00	5.80	-1.59
1985	$5,649.00	$107.00	1.89	14.58	$327.00	5.79	14.95	($220.00)	-3.89	-0.38
1986	$0.00	($18,487.00)	0.00	11.59	$0.00	0.00	13.09	($18,487.00)	0.00	-1.50
1987	$0.00	($9,061.00)	0.00	9.74	$0.00	0.00	13.16	($9,061.00)	0.00	-3.42
1988	$160,011.00	$39.00	0.02	8.37	$14,752.00	9.22	11.29	($14,713.00)	-9.20	-2.92
1989	$76,757.00	$730.00	0.95	7.18	$5,490.00	7.15	11.06	($4,760.00)	-6.20	-3.88
1990	$53,406.00	($115.00)	-0.22	6.73	$11,898.00	22.28	10.80	($12,013.00)	-22.49	-4.07
1991	$86,250.00	($33.00)	-0.04	6.84	$10,486.00	12.16	10.94	($10,519.00)	-12.20	-4.10
1992	$171,373.00	$0.00	0.00	4.50	$18,741.00	10.94	11.26	($18,741.00)	-10.94	-6.76
1993	$245,739.00	($1,260.00)	-0.51	-1.49	$16,928.00	6.89	9.53	($18,188.00)	-7.40	-11.02
1994	$287,322.00	($626.00)	-0.22	-2.64	$23,307.00	8.11	9.38	($23,933.00)	-8.33	-12.02
1995	$131,413.00	$0.00	0.00	-2.38	$24,383.00	18.55	10.39	($24,383.00)	-18.55	-12.77
1996	$266,836.00	$0.00	0.00	-0.70	$32,297.00	12.10	10.70	($32,297.00)	-12.10	-11.40
1997	$136,515.00	($33.00)	-0.02	-0.08	$60,207.00	44.10	13.52	($60,240.00)	-44.13	-13.60
1998	$194,779.00	($18.00)	-0.01	-0.08	$64,663.00	33.20	16.26	($64,681.00)	-33.21	-16.34
1999	$260,094.00	($333.00)	-0.13	-0.13	$43,594.00	16.76	16.71	($43,927.00)	-16.89	-16.85
2000	$52,736.00	$152.00	0.29	-0.12	$45,895.00	87.03	18.58	($45,743.00)	-86.74	-18.69
2001	$0.00	$0.00	0.00	-0.12	$0.00	0.00	18.89	$0.00	0.00	-19.01
	$3,223,070.00	$141,408.00	4.39		$525,658.00	16.31		($384,250.00)	-11.92	

Net Salvage Analysis Report

MN08-380-Service, Metallic and Plastic

		Gross Salvage			Cost of Removal			Net Salvage		
Year	Retirements	Amount	Pct.	10 - Yr Avg	Amount	Pct.	10 - Yr Avg	Amount	Pct.	10 - Yr Avg
1944	$1,623.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1945	$1,949.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1946	$3,285.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1947	$3,613.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1948	$3,389.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1949	$5,747.00	$0.00	0.00		$0.00	0.00		$0.00	0.00	
1950	$6,197.00	$3.00	0.05		$5,236.00	84.49		($5,233.00)	-84.44	
1951	$5,205.00	$127.00	2.44		$4,856.00	93.29		($4,729.00)	-90.85	
1952	$17,277.00	$36.00	0.21		$9,454.00	54.72		($9,418.00)	-54.51	
1953	$15,269.00	$38.00	0.25	0.32	$8,072.00	52.87	43.46	($8,034.00)	-52.62	-43.14
1954	$21,309.00	$140.00	0.66	0.41	$13,024.00	61.12	48.83	($12,884.00)	-60.46	-48.41
1955	$16,255.00	$41.00	0.25	0.39	$9,654.00	59.39	51.56	($9,613.00)	-59.14	-51.17
1956	$45,687.00	$363.00	0.79	0.53	$10,010.00	21.91	43.09	($9,647.00)	-21.12	-42.56
1957	$31,602.00	$82.00	0.26	0.49	$12,500.00	39.55	43.35	($12,418.00)	-39.30	-42.86
1958	$29,525.00	($88.00)	-0.30	0.38	$13,244.00	44.86	44.34	($13,332.00)	-45.16	-43.96
1959	$35,626.00	$2,497.00	7.01	1.45	$22,108.00	62.06	48.30	($19,611.00)	-55.05	-46.85
1960	$49,007.00	$3,004.00	6.13	2.34	$43,930.00	89.64	55.05	($40,926.00)	-83.51	-52.71
1961	$24,930.00	$518.00	2.08	2.31	$37,704.00	151.24	62.73	($37,186.00)	-149.16	-60.41
1962	$40,373.00	$3,098.00	7.67	3.13	$49,880.00	123.55	71.10	($46,782.00)	-115.87	-67.97
1963	$37,209.00	$860.00	2.31	3.17	$48,458.00	130.23	78.58	($47,598.00)	-127.92	-75.41
1964	$55,921.00	$53.00	0.09	2.85	$95,052.00	169.98	93.56	($94,999.00)	-169.88	-90.71
1965	$57,529.00	$80.00	0.14	2.57	$68,093.00	118.36	98.42	($68,013.00)	-118.22	-95.85
1966	$49,230.00	$192.00	0.39	2.51	$63,443.00	128.87	110.58	($63,251.00)	-128.48	-108.07
1967	$53,495.00	$6.00	0.01	2.36	$68,249.00	127.58	117.86	($68,243.00)	-127.57	-115.50
1968	$60,123.00	$266.00	0.44	2.28	$72,934.00	121.31	122.96	($72,668.00)	-120.87	-120.68
1969	$56,841.00	$4.00	0.01	1.67	$88,300.00	155.35	131.24	($88,296.00)	-155.34	-129.57
1970	$57,541.00	$7,274.00	12.64	2.50	$82,077.00	142.64	136.70	($74,803.00)	-130.00	-134.20

Net Salvage Analysis Report

MN08-380-Service, Metallic and Plastic

		Gross Salvage			Cost of Removal			Net Salvage		
Year	Retirements	Amount	Pct.	10 - Yr Avg	Amount	Pct.	10 - Yr Avg	Amount	Pct.	10 - Yr Avg
1971	$74,421.00	$8,980.00	12.07	3.84	$121,204.00	162.86	139.62	($112,224.00)	-150.80	-135.78
1972	$120,906.00	$11,880.00	9.83	4.75	$112,823.00	93.31	131.68	($100,943.00)	-83.49	-126.93
1973	$111,501.00	$13,851.00	12.42	6.11	$180,901.00	162.24	136.64	($167,050.00)	-149.82	-130.53
1974	$159,759.00	$112,113.00	70.18	19.30	$195,746.00	122.53	131.50	($83,633.00)	-52.35	-112.20
1975	$118,864.00	$7,103.00	5.98	18.74	$189,603.00	159.51	136.24	($182,500.00)	-153.54	-117.50
1976	$178,175.00	$12,135.00	6.81	17.51	$227,650.00	127.77	135.08	($215,515.00)	-120.96	-117.57
1977	$249,706.00	$2,554.00	1.02	14.83	$149,587.00	59.91	119.61	($147,033.00)	-58.88	-104.78
1978	$205,430.00	$22,149.00	10.78	14.86	$253,111.00	123.21	120.09	($230,962.00)	-112.43	-105.24
1979	$349,388.00	$18,488.00	5.29	13.32	$271,769.00	77.78	109.77	($253,281.00)	-72.49	-96.45
1980	$410,284.00	$22,628.00	5.52	11.72	$380,739.00	92.80	105.29	($358,111.00)	-87.28	-93.57
1981	$594,770.00	$48,873.00	8.22	10.88	$504,320.00	84.79	98.70	($455,447.00)	-76.58	-87.82
1982	$569,403.00	$8,188.00	1.44	9.10	$371,188.00	65.19	92.45	($363,000.00)	-63.75	-83.35
1983	$314,008.00	$1,921.00	0.61	8.13	$179,750.00	57.24	86.47	($177,829.00)	-56.63	-78.33
1984	$287,946.00	$3,739.00	1.30	4.51	$196,827.00	68.36	83.12	($193,088.00)	-67.06	-78.61
1985	$464,684.00	$12,383.00	2.66	4.22	$160,665.00	34.58	74.39	($148,282.00)	-31.91	-70.16
1986	$308,802.00	$28,141.00	9.11	4.50	$226,714.00	73.42	71.77	($198,573.00)	-64.30	-67.27
1987	$369,881.00	$64,311.00	17.39	5.96	$239,418.00	64.73	71.87	($175,107.00)	-47.34	-65.91
1988	$401,329.00	$49,614.00	12.36	6.35	$208,882.00	52.05	67.32	($159,268.00)	-39.69	-60.98
1989	$597,433.00	$14,548.00	2.44	5.89	$311,188.00	52.09	64.37	($296,640.00)	-49.65	-58.48
1990	$1,137,819.00	$4,832.00	0.42	4.69	$371,956.00	32.69	54.91	($367,124.00)	-32.27	-50.22
1991	$1,024,195.00	$23,720.00	2.32	3.86	$539,441.00	52.67	51.25	($515,721.00)	-50.35	-47.39
1992	$1,432,777.00	$6,249.00	0.44	3.30	$567,208.00	39.59	47.36	($560,959.00)	-39.15	-44.06
1993	$994,496.00	$37,551.00	3.78	3.49	$497,199.00	50.00	47.29	($459,648.00)	-46.22	-43.80
1994	$1,469,987.00	$25,100.00	1.71	3.25	$534,057.00	36.33	44.59	($508,957.00)	-34.62	-41.34
1995	$1,733,378.00	$54,148.00	3.12	3.25	$638,533.00	36.84	43.66	($584,385.00)	-33.71	-40.40
1996	$537,165.00	$80,302.00	14.95	3.72	$559,223.00	104.11	46.06	($478,921.00)	-89.16	-42.34
1997	$201,905.00	$94,798.00	46.95	4.10	$459,201.00	227.43	49.18	($364,403.00)	-180.48	-45.08

Net Salvage Analysis Report

MN08-380-Service, Metallic and Plastic

		Gross Salvage			Cost of Removal			Net Salvage		
Year	Retirements	Amount	Pct.	10 - Yr Avg	Amount	Pct.	10 - Yr Avg	Amount	Pct.	10 - Yr Avg
1998	$2,311,708.00	$75,095.00	3.25	3.64	$501,770.00	21.71	43.53	($426,675.00)	-18.46	-39.89
1999	$2,817,195.00	$116,063.00	4.12	3.79	$392,587.00	13.94	37.05	($276,524.00)	-9.82	-33.26
2000	$1,629,029.00	$107,488.00	6.60	4.38	$399,207.00	24.51	35.96	($291,719.00)	-17.91	-31.57
2001	$1,457,980.41	($225.91)	-0.02	4.09	$234,992.02	16.12	32.80	($235,217.93)	-16.13	-28.71
	$23,420,081.41	$1,107,313.09	4.73		$11,003,737.02	46.98		($9,896,423.93)	-42.26	

SCHEDULE F
COMPARISON OF ACTUAL AND THEORETICAL RESERVE

Northern States Power Company **Schedule F**

Comparison of Actual and Theoretical Reserve

Electric Utility

FERC Acct	Account Description	Plant Balance 12/31/2001	Recoverable Cost	Theoretical Reserve	Actual Reserve	Difference
Transmission						
352	Structures and Improvements	15,546,448	15,546,448	4,778,891	5,428,300	649,409
353	Station Equipment	395,281,433	395,281,433	72,976,992	113,866,442	40,889,450
354	Towers and Fixtures	95,418,705	119,273,381	46,892,624	56,604,640	9,712,016
355	Poles and Fixtures	148,536,485	163,390,133	49,173,498	80,147,096	30,973,598
356	Overhead Conductors and Devices	147,942,683	192,325,488	57,370,611	69,323,362	11,952,751
357	Underground Conduit	5,834,658	5,834,658	1,578,740	2,331,987	753,247
358	Underground Conductor and Devices	8,407,211	8,407,211	1,743,784	3,425,597	1,681,813
	Total Transmission	816,967,623	900,058,753	234,515,140	331,127,424	96,612,284
Distribution						
361	Structures and Improvements	26,913,435	35,232,059	10,085,024	11,478,795	1,393,771
362	Station Equipment	350,098,569	385,108,426	99,551,892	106,155,558	6,603,666
364	Poles, Towers, and Fixtures	204,216,004	388,010,407	143,720,465	146,239,404	2,518,939
365	Overhead Conductors and Devices	238,730,303	286,476,363	103,741,462	72,435,740	(31,305,722)
366	Underground Conduit	108,716,550	108,716,550	33,715,603	45,473,844	11,758,241
367	Underground Conductor and Devices	590,201,663	472,204,040	117,884,851	129,172,518	11,287,667
369	Overhead Services	62,204,118	77,755,148	37,259,368	35,724,780	(1,534,588)
369	Underground Services	140,755,872	175,944,840	45,721,595	53,887,872	8,166,277
373	Street Lighting and Signal Systems	38,160,470	45,792,564	31,589,277	27,787,677	(3,801,600)
	Total Distribution	1,759,996,984	1,975,240,398	623,269,537	628,356,186	5,086,649
General						
390	Structures and Improvements	48,500,144	48,500,144	14,967,332	15,266,086	298,754
	Total Electric	2,625,464,751	2,923,799,295	872,752,009	974,749,696	101,997,687

Northern States Power Company **Schedule F**

Comparison of Actual and Theoretical Reserve

Gas Utility

FERC Acct	Account Description	Plant Balance 12/31/2001	Recoverable Cost	Theoretical Reserve	Actual Reserve	Difference
Transmission						
366	Structures and Improvements	761,733	761,733	329,121	389,992	60,871
367	Mains	20,709,180	26,921,934	9,153,190	13,402,396	4,249,206
369	Measure and Regulating Station	4,174,114	3,756,703	1,306,523	944,744	(361,779)
	Total Transmission	25,645,028	31,440,370	10,788,834	14,737,132	3,948,298
Distribution						
375	Structures and Improvements	180,644	180,644	50,155	38,509	(11,646)
376	Mains - Metallic	75,913,277	98,687,261	49,142,697	38,956,824	(10,185,873)
376	Mains - Plastic	211,096,012	242,760,414	50,041,426	53,841,810	3,800,384
378&9	Measure & Regulating - General	5,804,604	6,381,725	2,272,566	1,164,834	(1,107,732)
380	Services - Metallic	15,044,095	22,566,142	21,414,685	15,113,144	(6,301,541)
380	Service - Plastic	194,897,951	292,346,926	67,517,923	74,482,418	6,964,495
	Total Distribution	502,936,582	662,923,111	190,439,452	183,597,538	(6,841,914)
General						
390	Structures and Improvements	855,740	855,740	81,847	105,607	23,760
	Total Gas	529,437,349	695,219,221	201,310,133	198,440,277	(2,869,856)

Northern States Power Company **Schedule F**

Comparison of Actual and Theoretical Reserve

Common Utility

FERC Acct	Account Description	Plant Balance 12/31/2001	Recoverable Cost	Theoretical Reserve	Actual Reserve	Difference
General						
390	Structures and Improvements	58,181,883	58,181,883	14,682,594	18,090,628	3,408,034
	Total Common	58,181,883	58,181,883	14,682,594	18,090,628	3,408,034

SCHEDULE G
PLANT IN SERVICE

NORTHERN STATES POWER COMPANY
1998 PLANT IN SERVICE

SCHEDULE G

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
ELECTRIC								
350	411500	TRANSMISSION LAND - FEE	4,143,865		-139,954			4,003,911
350	411501	TRANSMISSION LAND - OTHER	33,026,636	941,513	-18,945			33,949,204
352	411520	TRANSMISSION STRUCTURE & IMPROVE	12,668,473	1,929,384	-7,267	100,415		14,691,005
353	411530	TRANSMISSION STATION EQUIPMENT	330,809,314	20,327,278	-831,317	-149,368		350,155,908
354	411540	TRANSMISSION TOWERS & FIXTURES	93,577,656	1,570,539	-64,321			95,083,873
355	411550	TRANSMISSION POLES & FIXTURES	118,246,815	7,058,949	-2,046,866	-458,842		122,800,056
356	411560	TRANSMISSION OH CONDUCTOR & DEVICE	132,412,085	4,084,001	-1,165,125	464,603		135,795,564
357	411570	TRANSMISSION UNDERGROUND CONDUIT	5,532,169	367,139	-105,703	34,181		5,827,786
358	411580	TRANSMISSION UG CONDUCTOR & DEVICE	7,310,115	518,405	-640,007	-34,181		7,154,332
		TOTAL	737,727,126	36,797,208	-5,019,504	-43,191	0	769,461,639
360	411600	DISTRIBUTION LAND - FEE	10,641,750	268,351	-11,128	-757		10,898,217
360	411601	DISTRIBUTION LAND - OTHER	60,842	8,833		-25,721		43,955
361	411605	DISTRIBUTION STRUCTURE & IMPROVE	24,776,039	1,283,996	-72,653	58,897		26,046,280
362	411607	DISTRIBUTION STATION EQUIPMENT	290,797,540	17,475,717	-2,123,683	-9,945		306,139,629
364	411609	DISTRIBUTION POLES, TOWERS & FIXTURES	166,884,807	13,862,443	-1,659,672	6,456		179,094,035
365	411611	DISTRIBUTION OH CONDUCTOR & DEVICE	201,432,839	14,978,210	-2,976,281	41,057		213,475,826
366	411621	DISTRIBUTION UNDERGROUND CONDUIT	91,887,868	3,458,587	-409,971	1,373		94,937,857
367	411623	DISTRIBUTION UG CONDUCTOR & DEVICE	467,413,002	29,952,791	-5,347,679	15,544		492,033,657
369	411641	DISTRIBUTION SERVICES-OH	52,858,178	3,069,366	-524,312	-19,088		55,384,145
369	411645	DISTRIBUTION SERVICES-UG	106,303,386	7,123,587	-71,191	-24,335		113,331,447
373	411671	DISTRIBUTION STREET LIGHT & SG SYS	25,602,404	1,816,446	-176,142			27,242,708
		TOTAL	1,438,658,656	93,298,327	-13,372,711	43,483	0	1,518,627,755
389	411900	GENERAL LAND - FEE	4,361,883		-5,205			4,356,678
389	411901	GENERAL LAND - OTHER	665					665
390	411911	GENERAL STRUCTURES & IMPROVE	44,682,455	1,043,633	-436,462			45,289,626
		TOTAL	49,045,003	1,043,633	-441,667	0	0	49,646,969
		ELECTRIC UTILITY TOTAL	2,225,430,785	131,139,168	-18,833,883	291	0	2,337,736,362

NORTHERN STATES POWER COMPANY
1998 PLANT IN SERVICE

SCHEDULE G

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
GAS								
365.1	421500	TRANSMISSION LAND - FEE	81,316					81,316
365.1	421501	TRANSMISSION LAND - OTHER	359,985					359,985
366.2	421505	TRANSMISSION STRUCTURE & IMPROVE	628,267	16,982	-5,402			639,847
367	421507	TRANSMISSION MAINS	20,282,877	69,259				20,352,135
369	421511	TRANSMISSION MEASURE & REG STATION EC	2,815,634	944,673	-159,608			3,600,700
		TOTAL	24,168,078	1,030,914	-165,010	0	0	25,033,983
374	421600	DISTRIBUTION LAND - FEE	58,720					58,720
374	421601	DISTRIBUTION LAND - OTHER	1,044					1,044
375	421605	DISTRIBUTION STRUCTURE & IMPROVE	181,831					181,831
376	421607	DISTRIBUTION MAINS-METALLIC	71,534,439	2,877,130	-1,161,766	-14,667		73,235,135
376	421608	DISTRIBUTION MAINS-PLASTIC	149,739,332	16,702,891	-718,481	79,702		165,803,445
378	421609	DISTRIBUTION MEAS & REG STATION EQ-GEN	5,196,642	172,381	-194,778	19,760		5,194,005
379	421611	DISTRIBUTION M & R STATION EQ-CITY GATE	98,619					98,619
380	421613	DISTRIBUTION SERVICE-METALLIC	17,387,750	167,500	-1,097,883	-105,178		16,352,189
380	421614	DISTRIBUTION SERVICE-PLASTIC	151,567,216	10,847,255	-1,213,826	47,948		161,248,594
		TOTAL	395,765,592	30,767,158	-4,386,734	27,565	0	422,173,581
389	421900	GENERAL LAND - OTHER	123,397					123,397
390	421911	GENERAL STRUCTURES & IMPROVE	197,905	469,835				667,740
		TOTAL	321,302	469,835	0	0	0	791,137
		GAS UTILITY TOTAL	420,254,972	32,267,907	-4,551,743	27,565	0	447,998,701
COMMON								
301	481010	ORGANIZATION	100,608					100,608
389	481900	GENERAL LAND - FEE	1,916,779	45,680				1,962,458
389	481901	GENERAL LAND - OTHER	5,572					5,572
390	481911	GENERAL STRUCTURES & IMPROVE	45,029,794	2,031,502	-498,646			46,562,64[illegible]
		TOTAL	47,052,752	2,077,181	-498,646	0	0	48,631,2[illegible]
		COMMON UTILITY TOTAL	47,052,752	2,077,181	-498,646	0	0	48,631,2[illegible]
		AVERAGE SERVICE LIFE-TOTAL UTILITIES	2,692,738,509	165,484,256	-23,884,272	27,857	0	2,834,366,3[illegible]

NORTHERN STATES POWER COMPANY
1999 PLANT IN SERVICE

SCHEDULE G

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
ELECTRIC								
350	411500	TRANSMISSION LAND - FEE	4,003,911	28,528	-120,181	4,399		3,916,657
350	411501	TRANSMISSION LAND - OTHER	33,949,204	277,123		-4,399		34,221,928
352	411520	TRANSMISSION STRUCTURE & IMPROVE	14,691,005	2,415,207	-1,368			17,104,844
353	411530	TRANSMISSION STATION EQUIPMENT	350,155,908	19,752,797	-1,315,621	-296,843		368,296,242
354	411540	TRANSMISSION TOWERS & FIXTURES	95,083,873	339,228	-79,359	-43,436		95,300,306
355	411550	TRANSMISSION POLES & FIXTURES	122,800,056	14,336,685	-930,276	-906,853		135,299,612
356	411560	TRANSMISSION OH CONDUCTOR & DEVICE	135,795,564	7,031,857	-701,724	-762,999		141,362,699
357	411570	TRANSMISSION UNDERGROUND CONDUIT	5,827,786					5,827,786
358	411580	TRANSMISSION UG CONDUCTOR & DEVICE	7,154,332	1,171,455				8,325,787
		TOTAL	769,461,639	45,352,881	-3,148,529	-2,010,131	0	809,655,860
360	411600	DISTRIBUTION LAND - FEE	10,898,217	90,178	-3,400		49,127	11,034,121
360	411601	DISTRIBUTION LAND - OTHER	43,955	-1				43,955
361	411605	DISTRIBUTION STRUCTURE & IMPROVE	26,046,280	261,305	-185,783			26,121,802
362	411607	DISTRIBUTION STATION EQUIPMENT	306,139,629	20,897,173	-2,140,163	296,843		325,193,481
364	411609	DISTRIBUTION POLES, TOWERS & FIXTURES	179,094,035	10,366,009	-1,909,169	423,112		187,973,988
365	411611	DISTRIBUTION OH CONDUCTOR & DEVICE	213,475,826	15,742,733	-3,519,348	296,808		225,996,019
366	411621	DISTRIBUTION UNDERGROUND CONDUIT	94,937,857	4,205,502	-534,119			98,609,240
367	411623	DISTRIBUTION UG CONDUCTOR & DEVICE	492,033,657	36,396,469	-5,617,672	31,147		522,843,601
369	411641	DISTRIBUTION SERVICES-OH	55,384,145	2,907,005	-388,976	-5,946		57,896,228
369	411645	DISTRIBUTION SERVICES-UG	113,331,447	8,327,716	-90,394	-30,557		121,538,212
373	411671	DISTRIBUTION STREET LIGHT & SG SYS	27,242,708	977,010	-200,837			28,018,882
		TOTAL	1,518,627,755	100,171,099	-14,589,861	1,011,407	49,127	1,605,269,527
389	411900	GENERAL LAND - FEE	4,356,678	5,539				4,362,217
389	411901	GENERAL LAND - OTHER	665					665
390	411911	GENERAL STRUCTURES & IMPROVE	45,289,625	688,485	-11,021			45,967,090
		TOTAL	49,646,968	694,024	-11,021	0	0	50,329,97[illegible]
		ELECTRIC UTILITY TOTAL	2,337,736,362	146,218,004	-17,749,411	-998,724	49,127	2,465,255,35[illegible]

NORTHERN STATES POWER COMPANY
1999 PLANT IN SERVICE

SCHEDULE G

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
GAS								
365.1	421500	TRANSMISSION LAND - FEE	81,316					81,316
365.1	421501	TRANSMISSION LAND - OTHER	359,985					359,985
366.2	421505	TRANSMISSION STRUCTURE & IMPROVE	639,847	56,432		2,719		698,998
367	421507	TRANSMISSION MAINS	20,352,135	35,605				20,387,740
369	421511	TRANSMISSION MEASURE & REG STATION EQ	3,600,700	115,706	-13,275	2,622		3,705,753
		TOTAL	25,033,983	207,742	-13,275	5,341	0	25,233,792
374	421600	DISTRIBUTION LAND - FEE	58,720					58,720
374	421601	DISTRIBUTION LAND - OTHER	1,044	10,100				11,144
375	421605	DISTRIBUTION STRUCTURE & IMPROVE	181,831					181,831
376	421607	DISTRIBUTION MAINS-STEEL	73,235,135	1,374,291	-1,064,354	-22,221		73,522,851
376	421608	DISTRIBUTION MAINS-METALLIC	165,803,445	14,050,037	-1,047,582	22,191	36	178,828,126
378	421609	DISTRIBUTION MEAS & REG STATION EQ-GEN	5,194,005	412,296	-260,094	-5,341		5,340,866
379	421611	DISTRIBUTION M & R STATION EQ-CITY GATE	98,619					98,619
380	421613	DISTRIBUTION SERVICE-METALLIC	16,352,189	193,386	-862,106	-3,168	241,797	15,922,097
380	421614	DISTRIBUTION SERVICE-PLASTIC	161,248,594	11,591,727	-1,955,086	3,656	757,877	171,646,766
		TOTAL	422,173,581	27,631,837	-5,189,224	-4,883	999,709	445,611,020
389	421900	GENERAL LAND - OTHER	123,397	36,725				160,121
390	421911	GENERAL STRUCTURES & IMPROVE	667,740	45,442	-5,000			708,181
		TOTAL	791,137	82,166	-5,000	0	0	868,303
		GAS UTILITY TOTAL	447,998,701	27,921,745	-5,207,499	457	999,709	471,713,114
COMMON								
301	481010	ORGANIZATION	100,608					100,608
389	481900	GENERAL LAND - FEE	1,962,458	85,850				2,048,308
389	481901	GENERAL LAND - OTHER	5,572					5,572
390	481911	GENERAL STRUCTURES & IMPROVE	46,562,649	2,151,842	-262,683			48,451,8[illegible]
		TOTAL	48,631,287	2,237,692	-262,683	0	0	50,606,2[illegible]
		COMMON UTILITY TOTAL	48,631,287	2,237,692	-262,683	0	0	50,606,297
		AVERAGE SERVICE LIFE-TOTAL UTILITIES	2,834,366,350	176,377,441	-23,219,592	-998,267	1,048,836	2,987,574,7[illegible]

NORTHERN STATES POWER COMPANY
2000 PLANT IN SERVICE

SCHEDULE G

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
ELECTRIC								
350	411500	TRANSMISSION LAND - FEE	3,916,657	59,179		-19,639		3,956,197
350	411501	TRANSMISSION LAND - OTHER	34,221,928	141,302	-112	7,980		34,371,098
352	411520	TRANSMISSION STRUCTURE & IMPROVE	17,104,844	70,100	-20,274	-1,830,000		15,324,670
353	411530	TRANSMISSION STATION EQUIPMENT	368,296,242	9,502,058	-1,639,005	2,476,592		378,635,887
354	411540	TRANSMISSION TOWERS & FIXTURES	95,300,306	178,458	-60,059			95,418,705
355	411550	TRANSMISSION POLES & FIXTURES	135,299,612	4,579,822	-289,039	14,312	140	139,604,846
356	411560	TRANSMISSION OH CONDUCTOR & DEVICE	141,362,699	2,582,084	-243,946	18,490	502	143,719,829
357	411570	TRANSMISSION UNDERGROUND CONDUIT	5,827,786					5,827,786
358	411580	TRANSMISSION UG CONDUCTOR & DEVICE	8,325,787	73,575				8,399,362
		TOTAL	809,655,860	17,186,578	-2,252,434	667,735	642	825,258,380
360	411600	DISTRIBUTION LAND - FEE	11,034,121	667,538	-510			11,701,149
360	411601	DISTRIBUTION LAND - OTHER	43,955	9,958				53,913
361	411605	DISTRIBUTION STRUCTURE & IMPROVE	26,121,802	245,459	-130,869	-11,469	30,880	26,255,803
362	411607	DISTRIBUTION STATION EQUIPMENT	325,193,481	19,127,100	-5,933,577	-658,785		337,728,220
364	411609	DISTRIBUTION POLES, TOWERS & FIXTURES	187,973,988	8,466,062	-1,918,722	-19,294		194,502,034
365	411611	DISTRIBUTION OH CONDUCTOR & DEVICE	225,996,019	13,240,884	-3,583,144	7,018		235,660,776
366	411621	DISTRIBUTION UNDERGROUND CONDUIT	98,609,240	5,333,450	-265,028			103,677,662
367	411623	DISTRIBUTION UG CONDUCTOR & DEVICE	522,843,601	36,584,464	-5,265,407	9,089		554,171,747
369	411641	DISTRIBUTION SERVICES-OH	57,896,228	2,833,123	-461,222	-9,731		60,258,398
369	411645	DISTRIBUTION SERVICES-UG	121,538,212	8,354,300	-24,903	-9,089		129,858,520
373	411671	DISTRIBUTION STREET LIGHT & SG SYS	28,018,882	908,854	-258,391	22,365		28,691,709
		TOTAL	1,605,269,527	95,771,191	-17,841,772	-669,896	30,880	1,682,559,930
389	411900	GENERAL LAND - FEE	4,362,217	810				4,363,027
389	411901	GENERAL LAND - OTHER	665					665
390	411911	GENERAL STRUCTURES & IMPROVE	45,967,090	1,852,001	-183,259			47,635,833
		TOTAL	50,329,972	1,852,812	-183,259	0	0	51,999,525
		ELECTRIC UTILITY TOTAL	2,465,255,358	114,810,581	-20,277,465	-2,161	31,522	2,559,817,835

NORTHERN STATES POWER COMPANY
2000 PLANT IN SERVICE

SCHEDULE G

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
GAS								
365.1	421500	TRANSMISSION LAND - FEE	81,316					81,316
365.1	421501	TRANSMISSION LAND - OTHER	359,985					359,985
366.2	421505	TRANSMISSION STRUCTURE & IMPROVE	698,998	65,283				764,281
367	421507	TRANSMISSION MAINS	20,387,740	244,438	-9,810			20,622,368
369	421511	TRANSMISSION MEASURE & REG STATION EC	3,705,753	219,425	-10,740			3,914,438
		TOTAL	25,233,792	529,146	-20,550	0	0	25,742,388
374	421600	DISTRIBUTION LAND - FEE	58,720					58,720
374	421601	DISTRIBUTION LAND - OTHER	11,144	3,858				15,002
375	421605	DISTRIBUTION STRUCTURE & IMPROVE	181,831		-1,187			180,644
376	421607	DISTRIBUTION MAINS-METALLIC	73,522,851	2,380,170	-944,892	-112,967		74,845,163
376	421608	DISTRIBUTION MAINS-PLASTIC	178,828,126	16,719,047	-722,555	143,440		194,968,058
378	421609	DISTRIBUTION MEAS & REG STATION EQ-GEN	5,340,866	339,486	-52,736	-8,129		5,619,487
379	421611	DISTRIBUTION M & R STATION EQ-CITY GATE	98,619					98,619
380	421613	DISTRIBUTION SERVICE-METALLIC	15,922,097	61,856	-758,051	-3,375		15,222,527
380	421614	DISTRIBUTION SERVICE-PLASTIC	171,646,766	12,783,152	-870,979	-18,970		183,539,970
		TOTAL	445,611,020	32,287,569	-3,350,400	0	0	474,548,189
389	421900	GENERAL LAND - OTHER	160,121					160,121
390	421911	GENERAL STRUCTURES & IMPROVE	708,181	76,511				784,693
		TOTAL	868,303	76,511	0	0	0	944,814
		GAS UTILITY TOTAL	471,713,114	32,893,227	-3,370,950	0	0	501,235,391
COMMON								
301	481010	ORGANIZATION	100,608					100,608
389	481900	GENERAL LAND - FEE	2,048,308	6,060		-1,139		2,053,230
389	481901	GENERAL LAND - OTHER	5,572					5,5[illegible]
390	481911	GENERAL STRUCTURES & IMPROVE	48,451,809	7,630,733	-503			56,082,03[illegible]
		TOTAL	50,606,297	7,636,794	-503	-1,139	0	58,241,[illegible]
		COMMON UTILITY TOTAL	50,606,297	7,636,794	-503	-1,139	0	58,241,[illegible]
		AVERAGE SERVICE LIFE-TOTAL UTILITIES	2,987,574,769	155,340,601	-23,648,918	-3,299	31,522	3,119,294,[illegible]

NORTHERN STATES POWER COMPANY
2001 PLANT IN SERVICE

SCHEDULE G

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
ELECTRIC								
350	10350001	TRANSMISSION LAND - FEE	3,956,197	193,588				4,149,784
350	10350002	TRANSMISSION LAND - OTHER	34,371,098	27,818				34,398,916
352	10352000	TRANSMISSION STRUCTURE & IMPROVE	15,324,670	553,684		-331,906		15,546,448
353	10353000	TRANSMISSION STATION EQUIPMENT	378,635,887	16,353,080	-39,440	331,906		395,281,433
354	10354000	TRANSMISSION TOWERS & FIXTURES	95,418,705					95,418,705
355	10355000	TRANSMISSION POLES & FIXTURES	139,604,846	8,545,954		385,684		148,536,485
356	10356000	TRANSMISSION OH CONDUCTOR & DEVICE	143,719,829	4,608,539		-385,684		147,942,683
357	10357000	TRANSMISSION UNDERGROUND CONDUIT	5,827,786	6,872				5,834,658
358	10358000	TRANSMISSION UG CONDUCTOR & DEVICE	8,399,362	7,849				8,407,211
		TOTAL	825,258,380	30,297,383	-39,440	0	0	855,516,324
360	10360001	DISTRIBUTION LAND - FEE	11,701,149	1,291,674				12,992,823
360	10360002	DISTRIBUTION LAND - OTHER	53,913	1,620				55,533
361	10361000	DISTRIBUTION STRUCTURE & IMPROVE	26,255,803	657,632				26,913,435
362	10362000	DISTRIBUTION STATION EQUIPMENT	337,728,220	12,377,993	-7,644			350,098,569
364	10364000	DISTRIBUTION POLES, TOWERS & FIXTURES	194,502,034	11,046,623	-1,332,653			204,216,004
365	10365000	DISTRIBUTION OH CONDUCTOR & DEVICE	235,660,776	14,450,528	-2,245,747	-9,135,255		238,730,303
366	10366000	DISTRIBUTION UNDERGROUND CONDUIT	103,677,662	5,177,810	-138,922			108,716,550
367	10367000	DISTRIBUTION UG CONDUCTOR & DEVICE	554,171,747	41,201,272	-5,171,356			590,201,663
369	10369010	DISTRIBUTION SERVICES-OH	60,258,398	2,300,581	-354,711	-149		62,204,118
369	10369020	DISTRIBUTION SERVICES-UG	129,858,520	10,940,928	-43,576			140,755,872
373	10373000	DISTRIBUTION STREET LIGHT & SG SYS	28,691,709	660,780	-327,424	9,135,404		38,160,470
		TOTAL	1,682,559,930	100,107,442	-9,622,034	0	0	1,773,045,339
389	10389001	GENERAL LAND - FEE	4,363,027					4,363,027
389	10389002	GENERAL LAND - OTHER	665					665
390	10390000	GENERAL STRUCTURES & IMPROVE	47,635,833	871,936	-7,625			48,500,[illegible]
		TOTAL	51,999,525	871,936	-7,625	0	0	52,863,836
		ELECTRIC UTILITY TOTAL	2,559,817,835	131,276,762	-9,669,099	0	0	2,681,425,498

NORTHERN STATES POWER COMPANY **SCHEDULE G**
2001 PLANT IN SERVICE

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
GAS								
365	20365100	TRANSMISSION LAND - FEE	81,316					81,316
365	20365200	TRANSMISSION LAND - OTHER	359,985					359,985
366	20366000	TRANSMISSION STRUCTURE & IMPROVE	764,281	-2,548				761,733
367	20367000	TRANSMISSION MAINS	20,622,368	111,066	-24,255			20,709,180
369	20369000	TRANSMISSION MEASURE & REG STATION EC	3,914,438	259,677				4,174,114
		TOTAL	25,742,388	368,195	-24,255	0	0	26,086,328
374	20374000	DISTRIBUTION LAND - FEE	58,720					58,720
374	20374001	DISTRIBUTION LAND - OTHER	15,002	402				15,404
375	20375000	DISTRIBUTION STRUCTURE & IMPROVE	180,644					180,644
376	20376010	DISTRIBUTION MAINS-METALLIC	74,845,163	1,712,850	-644,735			75,913,277
376	20376020	DISTRIBUTION MAINS-PLASTIC	194,968,058	16,702,344	-574,391			211,096,012
378	20378000	DISTRIBUTION MEAS & REG STATION EQ-GEN	5,619,487	86,498				5,705,985
379	20379000	DISTRIBUTION M & R STATION EQ-CITY GATE	98,619					98,619
380	20380010	DISTRIBUTION SERVICE-METALLIC	15,222,527	241,391	-419,823			15,044,095
380	20380020	DISTRIBUTION SERVICE-PLASTIC	183,539,970	12,396,138	-1,038,157			194,897,951
		TOTAL	474,548,189	31,139,623	-2,677,106	0	0	503,010,705
389	20389001	GENERAL LAND - OTHER	160,121	20,000				180,121
390	20390000	GENERAL STRUCTURES & IMPROVE	784,693	71,047				855,740
		TOTAL	944,814	91,047	0	0	0	1,035,861
		GAS UTILITY TOTAL	501,235,391	31,598,866	-2,701,361	0	0	530,132,895
COMMON								
301	40301000	ORGANIZATION	100,608					100,608
389	40389001	GENERAL LAND - FEE	2,053,230					2,053,230
389	40389002	GENERAL LAND - OTHER	5,572					5,572
390	40390000	GENERAL STRUCTURES & IMPROVE	56,082,039	2,111,020	-11,177			58,181,8[illegible]
		TOTAL	58,241,449	2,111,020	-11,177	0	0	60,341,[illegible]
		COMMON UTILITY TOTAL	58,241,449	2,111,020	-11,177	0	0	60,341,[illegible]
		AVERAGE SERVICE LIFE-TOTAL UTILITIES	3,119,294,675	164,986,648	-12,381,637	0	0	3,271,899,[illegible]

NORTHERN STATES POWER COMPANY
2002 PLANT IN SERVICE **SCHEDULE G**

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
ELECTRIC								
350	10350001	TRANSMISSION LAND - FEE	4,149,784	257,526	-7,199			4,400,112
350	10350002	TRANSMISSION LAND - OTHER	34,398,916	515,877				34,914,793
352	10352000	TRANSMISSION STRUCTURE & IMPROVE	15,546,448	478,146	-166			16,024,428
353	10353000	TRANSMISSION STATION EQUIPMENT	395,281,433	15,544,736	-1,859,766	66,378		409,032,781
354	10354000	TRANSMISSION TOWERS & FIXTURES	95,418,705	284,661				95,703,366
355	10355000	TRANSMISSION POLES & FIXTURES	148,536,485	6,652,443	-12,905			155,176,023
356	10356000	TRANSMISSION OH CONDUCTOR & DEVICE	147,942,683	2,875,773	-5,128			150,813,328
357	10357000	TRANSMISSION UNDERGROUND CONDUIT	5,834,658					5,834,658
358	10358000	TRANSMISSION UG CONDUCTOR & DEVICE	8,407,211	86,950				8,494,161
		TOTAL	855,516,324	26,696,113	-1,885,164	66,378	0	880,393,650
360	10360001	DISTRIBUTION LAND - FEE	12,992,823					12,992,823
360	10360002	DISTRIBUTION LAND - OTHER	55,533					55,533
361	10361000	DISTRIBUTION STRUCTURE & IMPROVE	26,913,435	1,847,633				28,761,068
362	10362000	DISTRIBUTION STATION EQUIPMENT	350,098,569	9,698,541	-444,385	-66,378		359,286,347
364	10364000	DISTRIBUTION POLES, TOWERS & FIXTURES	204,216,004	6,196,655	-739,364			209,673,296
365	10365000	DISTRIBUTION OH CONDUCTOR & DEVICE	238,730,303	10,780,471	-1,105,484			248,405,289
366	10366000	DISTRIBUTION UNDERGROUND CONDUIT	108,716,550	23,616,125	-46,710			132,285,964
367	10367000	DISTRIBUTION UG CONDUCTOR & DEVICE	590,201,663	30,545,983	-3,761,758			616,985,888
369	10369010	DISTRIBUTION SERVICES-OH	62,204,118	3,364,054	-2,610,638			62,957,534
369	10369020	DISTRIBUTION SERVICES-UG	140,755,872	7,958,530	-2,529,577			146,184,826
373	10373000	DISTRIBUTION STREET LIGHT & SG SYS	38,160,470	1,394,618	-364,343			39,190,745
		TOTAL	1,773,045,339	95,402,610	-11,602,259	-66,378	0	1,856,779,313
389	10389001	GENERAL LAND - FEE	4,363,027					4,363,027
389	10389002	GENERAL LAND - OTHER	665					665
390	10390000	GENERAL STRUCTURES & IMPROVE	48,500,144	3,252,904				51,753,048
		TOTAL	52,863,836	3,252,904	0	0	0	56,116,7[illegible]
		ELECTRIC UTILITY TOTAL	2,681,425,498	125,351,627	-13,487,423	0	0	2,793,289,703

NORTHERN STATES POWER COMPANY **SCHEDULE G**
2002 PLANT IN SERVICE

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
GAS								
365	20365100	TRANSMISSION LAND - FEE	81,316					81,316
365	20365200	TRANSMISSION LAND - OTHER	359,985					359,985
366	20366000	TRANSMISSION STRUCTURE & IMPROVE	761,733					761,733
367	20367000	TRANSMISSION MAINS	20,709,180	3,831				20,713,011
369	20369000	TRANSMISSION MEASURE & REG STATION EQ	4,174,114	-9,635				4,164,479
		TOTAL	26,086,328	-5,804	0	0	0	26,080,524
374	20374000	DISTRIBUTION LAND - FEE	58,720	7,881				66,601
374	20374001	DISTRIBUTION LAND - OTHER	15,404					15,404
375	20375000	DISTRIBUTION STRUCTURE & IMPROVE	180,644					180,644
376	20376010	DISTRIBUTION MAINS-METALLIC	75,913,277	4,050,672	-423,962			79,539,987
376	20376020	DISTRIBUTION MAINS-PLASTIC	211,096,012	7,914,977	-799,169			218,211,820
378	20378000	DISTRIBUTION MEAS & REG STATION EQ-GEN	5,705,985	-103,232	-8,815			5,593,938
379	20379000	DISTRIBUTION M & R STATION EQ-CITY GATE	98,619	42,241				140,859
380	20380010	DISTRIBUTION SERVICE-METALLIC	15,044,095	66,957	-119,335			14,991,717
380	20380020	DISTRIBUTION SERVICE-PLASTIC	194,897,951	8,895,276	-211,020			203,582,207
		TOTAL	503,010,705	20,874,773	-1,562,301	0	0	522,323,177
389	20389001	GENERAL LAND - OTHER	180,121					180,121
390	20390000	GENERAL STRUCTURES & IMPROVE	855,740	4,040				859,780
		TOTAL	1,035,861	4,040	0	0	0	1,039,901
		GAS UTILITY TOTAL	530,132,895	20,873,009	-1,562,301	0	0	549,443,603
COMMON								
301	40301000	ORGANIZATION	100,608					100,608
389	40389001	GENERAL LAND - FEE	2,053,230	11,890				2,065,120
389	40389002	GENERAL LAND - OTHER	5,572					5,572
390	40390000	GENERAL STRUCTURES & IMPROVE	58,181,883	5,919,206	-84,542		-6,685,747	57,330,800
390	40390007	GENERAL STRUCTURES & IMPROVE-LEASED	0				6,685,747	6,685,747
		TOTAL	60,341,293	5,931,096	-84,542	0	0	66,187,846
		COMMON UTILITY TOTAL	60,341,293	5,931,096	-84,542	0	0	66,187,846
		AVERAGE SERVICE LIFE-TOTAL UTILITIES	3,271,899,686	152,155,732	-15,134,266	0	0	3,408,921,151

SCHEDULE H
ACCUMULATED DEPRECIATION

NORTHERN STATES POWER COMPANY
1998 ANALYSIS OF DEPRECIATION RESERVE

SCHEDULE H

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS ACCRUALS	CREDITS GROSS SALVAGE	DEBITS RETIREMENTS	DEBITS COST OF REMOVAL	TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
ELECTRIC									
352	511520	TRANSMISSION STRUCTURE & IMPROVE	4,182,510	294,346		7,267	13,664	5,485	4,461,412
353	511530	TRANSMISSION STATION EQUIPMENT	80,081,555	8,874,983	17,746	831,317	241,920	-36,782	87,864,264
354	511540	TRANSMISSION TOWERS & FIXTURES	46,179,901	2,566,925	-965	64,321	59,740	148,799	48,770,598
355	511550	TRANSMISSION POLES & FIXTURES	67,499,058	3,465,233	107,160	2,046,866	1,218,497	687,577	68,493,665
356	511560	TRANSMISSION OH CONDUCTOR & DEVICE	54,318,340	4,168,280	66,159	1,165,125	801,651	448,332	57,034,336
357	511570	TRANSMISSION UNDERGROUND CONDUIT	2,043,226	102,830	1	105,703	4,183	-22,097	2,014,075
358	511580	TRANSMISSION UG CONDUCTOR & DEVICE	3,287,768	183,486	72,657	640,007	99,359	22,097	2,826,642
		TOTAL	257,592,358	19,656,083	262,757	4,860,605	2,439,013	1,253,411	271,464,991
361	511605	DISTRIBUTION STRUCTURE & IMPROVE	9,020,255	730,510	-543	72,653	9,690	1,760	9,669,640
362	511607	DISTRIBUTION STATION EQUIPMENT	80,382,852	8,540,710	-3,457	2,123,683	329,891	30,016	86,496,548
364	511609	DISTRIBUTION POLES, TOWERS & FIXTURES	122,941,507	8,128,611	91,383	1,659,672	1,847,881	447,923	128,101,872
365	511611	DISTRIBUTION OH CONDUCTOR & DEVICE	57,397,396	7,753,761	383,976	2,976,281	1,692,351	368,099	61,234,600
366	511621	DISTRIBUTION UNDERGROUND CONDUIT	38,135,797	1,980,462	11,245	409,971	123,277	258,314	39,852,569
367	511623	DISTRIBUTION UG CONDUCTOR & DEVICE	104,123,260	9,928,035	277,163	5,347,679	434,643	1,059,579	109,605,715
369	511641	DISTRIBUTION SERVICES-OH	31,609,429	1,687,597	16,331	524,312	419,657	63,231	32,432,620
369	511645	DISTRIBUTION SERVICES-UG	38,760,084	3,413,687	13,144	71,191	9,144	24,163	42,130,743
373	511671	DISTRIBUTION STREET LIGHT & SG SYS	19,312,075	1,750,604	26,357	176,142	92,376	8,072	20,828,590
		TOTAL	501,682,655	43,913,977	815,598	13,361,584	4,958,909	2,261,158	530,352,896
390	511911	GENERAL STRUCTURES & IMPROVE	12,189,879	998,424	-38,854	436,462	139,211	5,332	12,579,108
		TOTAL	12,189,879	998,424	-38,854	436,462	139,211	5,332	12,579,108
		ELECTRIC UTILITY TOTAL	771,464,892	64,568,484	1,039,500	18,658,651	7,537,133	3,519,902	814,396,994

NORTHERN STATES POWER COMPANY
1998 ANALYSIS OF DEPRECIATION RESERVE

SCHEDULE H

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS: ACCRUALS	CREDITS: GROSS SALVAGE	DEBITS: RETIREMENTS	DEBITS: COST OF REMOVAL	TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
GAS									
366.2	521505	TRANSMISSION STRUCTURE & IMPROVE	320,004	17,964		5,402	264		332,302
367	521507	TRANSMISSION MAINS	10,938,717	585,947					11,524,664
369	521511	TRANSMISSION MEASURE & REG STATION EQ	680,356	101,217		159,608	5,403		616,562
		TOTAL	11,939,078	705,128	0	165,010	5,667	0	12,473,529
375	521605	DISTRIBUTION STRUCTURE & IMPROVE	19,016	5,184					24,200
376	521607	DISTRIBUTION MAINS-METALLIC	33,951,888	2,067,330	177	1,161,766	311,185	96,435	34,642,879
376	521608	DISTRIBUTION MAINS-PLASTIC	38,450,168	3,935,648	2,026	718,481	91,963	22,105	41,599,504
378	521609	DISTRIBUTION MEAS & REG STATION EQ-GEN	990,757	184,162	-18	194,778	64,663	2,458	917,917
379	521611	DISTRIBUTION M & R STATION EQ-CITY GATE	37,872	3,504					41,376
380	521613	DISTRIBUTION SERVICE-METALLIC	15,914,037	629,103	190	1,097,883	174,357	2,787	15,273,878
380	521614	DISTRIBUTION SERVICE-PLASTIC	53,617,535	5,796,018	2,941	1,213,826	327,413	69,176	57,944,432
		TOTAL	142,981,273	12,620,949	5,316	4,386,734	969,582	192,962	150,444,185
390	521911	GENERAL STRUCTURES & IMPROVE	44,438	10,227					54,665
		TOTAL	44,438	10,227	0	0	0	0	54,665
		GAS UTILITY TOTAL	154,964,789	13,336,304	5,316	4,551,743	975,249	192,962	162,972,379
COMMON									
390	581911	GENERAL STRUCTURES & IMPROVE	14,110,035	1,019,536	-43,832	498,646	56,657	-13,226	14,517,210
		TOTAL	14,110,035	1,019,536	-43,832	498,646	56,657	-13,226	14,517,210
		COMMON UTILITY TOTAL	14,110,035	1,019,536	-43,832	498,646	56,657	-13,226	14,51[illegible]
		AVERAGE SERVICE LIFE-TOTAL UTILITIES	940,539,715	78,924,324	1,000,985	23,709,040	8,569,039	3,699,638	991,88[illegible]

NORTHERN STATES POWER COMPANY
1999 ANALYSIS OF DEPRECIATION RESERVE

SCHEDULE H

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS		DEBITS		TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
				ACCRUALS	GROSS SALVAGE	RETIREMENTS	COST OF REMOVAL		
ELECTRIC									
352	511520	TRANSMISSION STRUCTURE & IMPROVE	4,461,412	329,465		1,368	1,254		4,788,254
353	511530	TRANSMISSION STATION EQUIPMENT	87,864,264	9,303,925	32,594	1,315,621	156,238	-33,574	95,695,351
354	511540	TRANSMISSION TOWERS & FIXTURES	48,770,598	2,586,085	47,210	79,359	130,791	32,175	51,225,918
355	511550	TRANSMISSION POLES & FIXTURES	68,493,665	3,688,323	67,368	930,276	438,875	787,703	71,667,908
356	511560	TRANSMISSION OH CONDUCTOR & DEVICE	57,034,336	4,259,627	40,487	701,724	529,973	594,353	60,697,106
357	511570	TRANSMISSION UNDERGROUND CONDUIT	2,014,075	105,960					2,120,035
358	511580	TRANSMISSION UG CONDUCTOR & DEVICE	2,826,642	180,068					3,006,710
		TOTAL	271,464,991	20,453,453	187,659	3,028,348	1,257,131	1,380,657	289,201,281
361	511605	DISTRIBUTION STRUCTURE & IMPROVE	9,669,640	753,260		185,783	65,656	95	10,171,555
362	511607	DISTRIBUTION STATION EQUIPMENT	86,496,548	9,021,884	499,247	2,140,163	335,508	37,529	93,579,537
364	511609	DISTRIBUTION POLES, TOWERS & FIXTURES	128,101,872	8,672,424	98,326	1,909,169	2,373,833	1,317,695	133,907,316
365	511611	DISTRIBUTION OH CONDUCTOR & DEVICE	61,234,600	8,204,379	315,180	3,519,348	2,105,564	976,317	65,105,563
366	511621	DISTRIBUTION UNDERGROUND CONDUIT	39,852,569	2,057,285	15,500	534,119	115,914	154,228	41,429,550
367	511623	DISTRIBUTION UG CONDUCTOR & DEVICE	109,605,715	10,612,651	229,076	5,617,672	513,006	1,446,977	115,763,741
369	511641	DISTRIBUTION SERVICES-OH	32,432,620	1,766,400	4,774	388,976	345,228	48,130	33,517,719
369	511645	DISTRIBUTION SERVICES-UG	42,130,743	3,650,552	9,914	90,394	13,289	71,781	45,759,307
373	511671	DISTRIBUTION STREET LIGHT & SG SYS	20,828,590	1,840,397	16,311	200,837	97,594	-3,913	22,382,954
		TOTAL	530,352,896	46,579,232	1,188,328	14,586,461	5,965,591	4,048,839	561,617,243
390	511911	GENERAL STRUCTURES & IMPROVE	12,579,108	1,009,852	-5,000	11,021	1,474		13,571,465
		TOTAL	12,579,108	1,009,852	-5,000	11,021	1,474	0	13,571,465
		ELECTRIC UTILITY TOTAL	814,396,994	68,042,537	1,370,986	17,625,830	7,224,195	5,429,496	864,389,989

NORTHERN STATES POWER COMPANY **SCHEDULE H**
1999 ANALYSIS OF DEPRECIATION RESERVE

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS ACCRUALS	CREDITS GROSS SALVAGE	DEBITS RETIREMENTS	DEBITS COST OF REMOVAL	TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
GAS									
366.2	521505	TRANSMISSION STRUCTURE & IMPROVE	332,302	19,498				52	351,852
367	521507	TRANSMISSION MAINS	11,524,664	587,911					12,112,575
369	521511	TRANSMISSION MEASURE & REG STATION EQ	616,562	128,127		13,275	3,147	36	728,304
		TOTAL	12,473,529	735,536	0	13,275	3,147	88	13,192,731
375	521605	DISTRIBUTION STRUCTURE & IMPROVE	24,200	5,184					29,384
376	521607	DISTRIBUTION MAINS-METALLIC	34,642,879	2,103,130	-3,659	1,064,354	35,771	61,248	35,703,473
376	521608	DISTRIBUTION MAINS-PLASTIC	41,599,504	4,322,113	619	1,047,582	75,413	12,371	44,811,612
378	521609	DISTRIBUTION MEAS & REG STATION EQ-GEN	917,917	184,777	-245	260,094	43,594	-88	798,674
379	521611	DISTRIBUTION M & R STATION EQ-CITY GATE	41,376	3,504					44,880
380	521613	DISTRIBUTION SERVICE-METALLIC	15,273,878	602,940	50	862,106	106,935	247,039	15,154,866
380	521614	DISTRIBUTION SERVICE-PLASTIC	57,944,432	6,158,611	457	1,955,086	285,652	868,190	62,730,951
		TOTAL	150,444,185	13,380,259	-2,778	5,189,224	547,365	1,188,761	159,273,839
390	521911	GENERAL STRUCTURES & IMPROVE	54,665	15,028		5,000		-12,615	52,078
		TOTAL	54,665	15,028	0	5,000	0	-12,615	52,078
		GAS UTILITY TOTAL	162,972,379	14,130,823	-2,778	5,207,499	550,512	1,176,233	172,518,648
COMMON									
390	581911	GENERAL STRUCTURES & IMPROVE	14,517,210	1,044,632	-59,549	262,683	56,672	-44,818	15,138,120
		TOTAL	14,517,210	1,044,632	-59,549	262,683	56,672	-44,818	15,138,120
		COMMON UTILITY TOTAL	14,517,210	1,044,632	-59,549	262,683	56,672	-44,818	15,13[illegible]
		AVERAGE SERVICE LIFE-TOTAL UTILITIES	991,886,583	83,217,992	1,308,660	23,096,011	7,831,378	6,560,911	1,052,04[illegible]

NORTHERN STATES POWER COMPANY
2000 ANALYSIS OF DEPRECIATION RESERVE

SCHEDULE H

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS ACCRUALS	CREDITS GROSS SALVAGE	DEBITS RETIREMENTS	DEBITS COST OF REMOVAL	TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
ELECTRIC									
352	511520	TRANSMISSION STRUCTURE & IMPROVE	4,788,254	357,301		20,274	195	-44,373	5,080,713
353	511530	TRANSMISSION STATION EQUIPMENT	95,695,351	9,792,515	-1,744	1,639,005	190,275	-164,450	103,492,392
354	511540	TRANSMISSION TOWERS & FIXTURES	51,225,918	2,591,110	-1,390	60,059	-40,817	215,944	54,012,340
355	511550	TRANSMISSION POLES & FIXTURES	71,667,908	3,958,862	281	289,039	334,971	269,890	75,272,930
356	511560	TRANSMISSION OH CONDUCTOR & DEVICE	60,697,106	4,400,285	56,989	243,946	209,472	206,526	64,907,488
357	511570	TRANSMISSION UNDERGROUND CONDUIT	2,120,035	105,960					2,225,995
358	511580	TRANSMISSION UG CONDUCTOR & DEVICE	3,006,710	208,865					3,215,575
		TOTAL	289,201,281	21,414,898	54,137	2,252,322	694,097	483,537	308,207,433
361	511605	DISTRIBUTION STRUCTURE & IMPROVE	10,171,555	756,510	1,531	130,869	117,556	31,340	10,712,513
362	511607	DISTRIBUTION STATION EQUIPMENT	93,579,537	9,571,385	-128,856	5,933,577	1,176,442	388,224	96,300,271
364	511609	DISTRIBUTION POLES, TOWERS & FIXTURES	133,907,316	9,056,796	124,967	1,918,722	2,086,404	420,064	139,504,016
365	511611	DISTRIBUTION OH CONDUCTOR & DEVICE	65,105,563	8,633,591	336,194	3,583,144	1,853,315	262,977	68,901,865
366	511621	DISTRIBUTION UNDERGROUND CONDUIT	41,429,550	2,151,002	7,326	265,028	77,995	122,974	43,367,829
367	511623	DISTRIBUTION UG CONDUCTOR & DEVICE	115,763,741	11,253,986	200,794	5,265,407	384,847	684,378	122,252,646
369	511641	DISTRIBUTION SERVICES-OH	33,517,719	1,843,239	4,879	461,222	357,227	22,181	34,569,570
369	511645	DISTRIBUTION SERVICES-UG	45,759,307	3,912,219	12,834	24,903	7,259	69,831	49,722,030
373	511671	DISTRIBUTION STREET LIGHT & SG SYS	22,382,954	1,888,010	4,724	258,391	110,199	69,254	23,976,353
		TOTAL	561,617,243	49,066,738	564,395	17,841,262	6,171,244	2,071,223	589,307,092
390	511911	GENERAL STRUCTURES & IMPROVE	13,571,465	1,039,687	-89,376	183,259	118,450		14,220,068
		TOTAL	13,571,465	1,039,687	-89,376	183,259	118,450	0	14,220,068
		ELECTRIC UTILITY TOTAL	864,389,989	71,521,323	529,155	20,276,843	6,983,791	2,554,760	911,734,592

NORTHERN STATES POWER COMPANY
2000 ANALYSIS OF DEPRECIATION RESERVE

SCHEDULE H

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS: ACCRUALS	CREDITS: GROSS SALVAGE	DEBITS: RETIREMENTS	DEBITS: COST OF REMOVAL	TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
GAS									
366.2	521505	TRANSMISSION STRUCTURE & IMPROVE	351,852	20,046				-3,674	368,224
367	521507	TRANSMISSION MAINS	12,112,575	590,479		9,810	-81,140	-22,780	12,751,605
369	521511	TRANSMISSION MEASURE & REG STATION EQ	728,304	132,278		10,740	34,025	-17,609	798,207
		TOTAL	13,192,731	742,803	0	20,550	-47,114	-44,063	13,918,036
375	521605	DISTRIBUTION STRUCTURE & IMPROVE	29,384	5,158		1,187			33,355
376	521607	DISTRIBUTION MAINS-METALLIC	35,703,473	2,130,603	-1,864	944,892	94,517	161,079	36,953,881
376	521608	DISTRIBUTION MAINS-PLASTIC	44,811,612	4,683,066	2,569	722,555	51,491	14,846	48,738,048
378	521609	DISTRIBUTION MEAS & REG STATION EQ-GEN	798,674	205,806	-152	52,736	46,593	-821	904,178
379	521611	DISTRIBUTION M & R STATION EQ-CITY GATE	44,880	3,504					48,384
380	521613	DISTRIBUTION SERVICE-METALLIC	15,154,866	586,322	8,173	758,051	127,418	2,690	14,866,582
380	521614	DISTRIBUTION SERVICE-PLASTIC	62,730,951	6,587,351	2,117	870,979	271,789	94,507	68,272,157
		TOTAL	159,273,839	14,201,810	10,844	3,350,400	591,808	272,301	169,816,585
390	521911	GENERAL STRUCTURES & IMPROVE	52,078	16,879					68,957
		TOTAL	52,078	16,879	0	0	0	0	68,957
		GAS UTILITY TOTAL	172,518,648	14,961,492	10,844	3,370,950	544,693	228,237	183,803,578
COMMON									
390	581911	GENERAL STRUCTURES & IMPROVE	15,138,120	1,105,669		503	11,128		16,232,159
		TOTAL	15,138,120	1,105,669	0	503	11,128	0	16,232,159
		COMMON UTILITY TOTAL	15,138,120	1,105,669	0	503	11,128	0	16,2[illegible]9
		AVERAGE SERVICE LIFE-TOTAL UTILITIES	1,052,046,757	87,588,484	[illegible]539,999	[illegible]23,648,296	7,539,612	2,782,997	1,111,7[illegible],329

NORTHERN STATES POWER COMPANY **SCHEDULE H**
2001 ANALYSIS OF DEPRECIATION RESERVE

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS ACCRUALS	CREDITS GROSS SALVAGE	DEBITS RETIREMENTS	DEBITS COST OF REMOVAL	TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
ELECTRIC									
352	10352000	TRANSMISSION STRUCTURE & IMPROVE	5,080,713	347,587					5,428,300
353	10353000	TRANSMISSION STATION EQUIPMENT	103,492,392	10,121,294	309,922	39,440	17,727		113,866,442
354	10354000	TRANSMISSION TOWERS & FIXTURES	54,012,340	2,592,301					56,604,640
355	10355000	TRANSMISSION POLES & FIXTURES	75,272,930	4,160,452	709,187		3,212	7,739	80,147,096
356	10356000	TRANSMISSION OH CONDUCTOR & DEVICE	64,907,488	4,479,489	-55,876			-7,739	69,323,362
357	10357000	TRANSMISSION UNDERGROUND CONDUIT	2,225,995	105,992					2,331,987
358	10358000	TRANSMISSION UG CONDUCTOR & DEVICE	3,215,575	210,023					3,425,597
		TOTAL	308,207,433	22,017,137	963,233	39,440	20,939	0	331,127,424
361	10361000	DISTRIBUTION STRUCTURE & IMPROVE	10,712,513	766,853			571		11,478,795
362	10362000	DISTRIBUTION STATION EQUIPMENT	96,300,271	9,945,933	-26,011	7,644	56,991		106,155,558
364	10364000	DISTRIBUTION POLES, TOWERS & FIXTURES	139,504,016	9,414,117	453,220	1,332,653	1,799,297		146,239,404
365	10365000	DISTRIBUTION OH CONDUCTOR & DEVICE	68,901,865	8,767,151	344,285	2,245,747	1,521,713	-1,810,101	72,435,740
366	10366000	DISTRIBUTION UNDERGROUND CONDUIT	43,367,829	2,252,514	56,374	138,922	63,950		45,473,844
367	10367000	DISTRIBUTION UG CONDUCTOR & DEVICE	122,252,646	11,947,592	692,269	5,171,356	548,632		129,172,518
369	10369010	DISTRIBUTION SERVICES-OH	34,569,570	1,906,378	29,671	354,711	426,128		35,724,780
369	10369020	DISTRIBUTION SERVICES-UG	49,722,030	4,199,375	16,934	43,576	6,891		53,887,872
373	10373000	DISTRIBUTION STREET LIGHT & SG SYS	23,976,353	2,406,694	60,231	327,424	138,277	1,810,101	27,787,677
		TOTAL	589,307,092	51,606,607	1,626,972	9,622,034	4,562,450	0	628,356,186
390	10390000	GENERAL STRUCTURES & IMPROVE	14,220,068	1,073,399		7,625	19,756		15,266,086
		TOTAL	14,220,068	1,073,399	0	7,625	19,756	0	15,266,086
		ELECTRIC UTILITY TOTAL	911,734,592	74,697,143	2,590,205	9,669,099	4,603,145	0	974,749,696

NORTHERN STATES POWER COMPANY
2001 ANALYSIS OF DEPRECIATION RESERVE

SCHEDULE H

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS: ACCRUALS	CREDITS: GROSS SALVAGE	DEBITS: RETIREMENTS	DEBITS: COST OF REMOVAL	TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
GAS									
366.2	20366000	TRANSMISSION STRUCTURE & IMPROVE	368,224	21,768					389,992
367	20367000	TRANSMISSION MAINS	12,751,605	597,332	77,500	8,085	15,956		13,402,396
369	20369000	TRANSMISSION MEASURE & REG STATION EQ	798,207	144,466				2,070	944,744
		TOTAL	13,918,036	763,567	77,500	8,085	15,956	2,070	14,737,132
375	20375000	DISTRIBUTION STRUCTURE & IMPROVE	33,355	5,154					38,509
376	20376010	DISTRIBUTION MAINS-METALLIC	36,953,881	2,183,377	846	637,370	46,542	502,632	38,956,824
376	20376020	DISTRIBUTION MAINS-PLASTIC	48,738,048	5,154,622	8,954	574,391	30,747	545,324	53,841,810
378	20378000	DISTRIBUTION MEAS & REG STATION EQ-GEN	904,178	208,770					1,112,948
379	20379000	DISTRIBUTION M & R STATION EQ-CITY GATE	48,384	3,502					51,886
380	20380010	DISTRIBUTION SERVICE-METALLIC	14,866,582	573,663	830	419,823	69,516	161,408	15,113,144
380	20380020	DISTRIBUTION SERVICE-PLASTIC	68,272,157	7,080,634	39,265	1,038,124	165,476	293,961	74,482,418
		TOTAL	169,816,585	15,209,722	49,895	2,669,708	312,281	1,503,326	183,597,538
390	20390000	GENERAL STRUCTURES & IMPROVE	68,957	18,500				18,151	105,607
		TOTAL	68,957	18,500	0	0	0	18,151	105,607
		GAS UTILITY TOTAL	183,803,578	15,991,788	127,395	2,677,793	328,237	1,523,546	198,440,277
COMMON									
390	40390000	GENERAL STRUCTURES & IMPROVE	16,232,159	1,872,574		11,177	2,928		18,090,628
		TOTAL	16,232,159	1,872,574	0	11,177	2,928	0	18,090,628
		COMMON UTILITY TOTAL	16,232,159	1,872,574	0	11,177	2,928	0	18,09[illegible]
		AVERAGE SERVICE LIFE-TOTAL UTILITIES	1,111,770,329	92,561,505	2,717,600	12,358,069	4,934,311	1,523,546	1,191,28[illegible]

NORTHERN STATES POWER COMPANY **SCHEDULE H**
2002 ANALYSIS OF DEPRECIATION RESERVE

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS: ACCRUALS	CREDITS: GROSS SALVAGE	DEBITS: RETIREMENTS	DEBITS: COST OF REMOVAL	TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
ELECTRIC									
352	10352000	TRANSMISSION STRUCTURE & IMPROVE	5,428,300	353,955		166			5,782,089
353	10353000	TRANSMISSION STATION EQUIPMENT	113,866,442	10,471,187		1,859,766		10,886	122,488,748
354	10354000	TRANSMISSION TOWERS & FIXTURES	56,604,640	2,594,483					59,199,124
355	10355000	TRANSMISSION POLES & FIXTURES	80,147,096	4,321,969		12,905	5,879		84,450,281
356	10356000	TRANSMISSION OH CONDUCTOR & DEVICE	69,323,362	4,588,963		5,128	5,403		73,901,794
357	10357000	TRANSMISSION UNDERGROUND CONDUIT	2,331,987	106,074					2,438,061
358	10358000	TRANSMISSION UG CONDUCTOR & DEVICE	3,425,597	210,418					3,636,016
		TOTAL	331,127,424	22,647,051	0	1,877,965	11,283	10,886	351,896,113
361	10361000	DISTRIBUTION STRUCTURE & IMPROVE	11,478,795	795,496					12,274,291
362	10362000	DISTRIBUTION STATION EQUIPMENT	106,155,558	10,179,273	-890	444,385	-890	-10,886	115,879,559
364	10364000	DISTRIBUTION POLES, TOWERS & FIXTURES	146,239,404	9,770,498	74,288	739,364	750,623		154,594,204
365	10365000	DISTRIBUTION OH CONDUCTOR & DEVICE	72,435,740	9,103,006	56,765	1,105,484	1,177,045		79,312,981
366	10366000	DISTRIBUTION UNDERGROUND CONDUIT	45,473,844	2,525,797	2,705	46,710	54,777		47,900,859
367	10367000	DISTRIBUTION UG CONDUCTOR & DEVICE	129,172,518	12,623,816	51,281	3,761,758	272,122		137,813,735
369	10369010	DISTRIBUTION SERVICES-OH	35,724,780	1,981,350	75,698	2,610,638	259,969		34,911,221
369	10369020	DISTRIBUTION SERVICES-UG	53,887,872	4,460,554	8,483	2,529,577	2,994		55,824,338
373	10373000	DISTRIBUTION STREET LIGHT & SG SYS	27,787,677	2,585,970	18,887	364,343	257,437		29,770,754
		TOTAL	628,356,186	54,025,761	287,216	11,602,259	2,774,077	-10,886	668,281,942
390	10390000	GENERAL STRUCTURES & IMPROVE	15,266,086	1,081,533					16,347,619
		TOTAL	15,266,086	1,081,533	0	0	0	0	16,347,619
		ELECTRIC UTILITY TOTAL	974,749,696	77,754,345	287,216	13,480,224	2,785,359	0	1,036,525,674

NORTHERN STATES POWER COMPANY
2002 ANALYSIS OF DEPRECIATION RESERVE

SCHEDULE H

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS: ACCRUALS	CREDITS: GROSS SALVAGE	DEBITS: RETIREMENTS	DEBITS: COST OF REMOVAL	TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
GAS									
366.2	20366000	TRANSMISSION STRUCTURE & IMPROVE	389,992	21,764					411,756
367	20367000	TRANSMISSION MAINS	13,402,396	598,586					14,000,982
369	20369000	TRANSMISSION MEASURE & REG STATION EQ	944,744	148,047					1,092,790
		TOTAL	14,737,132	768,397	0	0	0	0	15,505,528
375	20375000	DISTRIBUTION STRUCTURE & IMPROVE	38,509	5,161					43,670
376	20376010	DISTRIBUTION MAINS-METALLIC	38,956,824	2,261,231	38,811	423,962	-189,519		41,022,424
376	20376020	DISTRIBUTION MAINS-PLASTIC	53,841,810	5,433,082	-426	799,169	52,732		58,422,565
378	20378000	DISTRIBUTION MEAS & REG STATION EQ-GEN	1,112,948	201,832		8,815	407		1,305,558
379	20379000	DISTRIBUTION M & R STATION EQ-CITY GATE	51,886	3,562					55,447
380	20380010	DISTRIBUTION SERVICE-METALLIC	15,113,144	562,146	-402	119,335	73,631		15,481,921
380	20380020	DISTRIBUTION SERVICE-PLASTIC	74,482,418	7,387,351	-1,780	211,020	158,565		81,498,404
		TOTAL	183,597,538	15,854,365	36,203	1,562,301	95,816	0	197,829,989
390	20390000	GENERAL STRUCTURES & IMPROVE	105,607	19,052					124,659
		TOTAL	105,607	19,052	0	0	0	0	124,659
		GAS UTILITY TOTAL	198,440,277	16,641,814	36,203	1,562,301	95,816	0	213,460,176
COMMON									
390	40390000	GENERAL STRUCTURES & IMPROVE	18,090,628	1,301,728		84,542		-921,259	18,386,554
390	40390007	GENERAL STRUCTURES & IMPROVE-LEASED	0	1,057,346				921,259	1,978,605
		TOTAL	18,090,628	2,359,074	0	84,542	0	0	20,365,159
		COMMON UTILITY TOTAL	18,090,628	2,359,074	0	84,542	0	0	20,365,159
		AVERAGE SERVICE LIFE-TOTAL UTILITIES	1,191,280,601	96,755,233	323,419	15,127,067	2,881,175	0	1,270,351,009

SCHEDULE I

ANNUAL DEPRECIATION ACCRUAL DETERMINATION

NORTHERN STATES POWER COMPANY **SCHEDULE I**

1998 SUMMARY OF ANNUAL DEPRECIATION ACCRUALS

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING PLANT BALANCE	EST. FUTURE NET SALVAGE %	EST. FUTURE NET SALVAGE AMOUNT	BEGINNING DEPRECIATION RESERVE	NET BALANCE	DEPR LIFE (YRS)	ANNUAL ACCRUAL	DEPR RATE	RESERVE RATIO
UTILITY TOTALS											
352	511520	TRANSMISSION STRUCTURE & IMPROVE	12,668,473	0%	0	4,182,510	8,485,962	45	294,346	2.22%	33.02%
353	511530	TRANSMISSION STATION EQUIPMENT	330,809,314	0%	0	80,081,555	250,727,759	38	8,874,983	2.63%	24.21%
354	511540	TRANSMISSION TOWERS & FIXTURES	93,577,656	-25%	-23,394,414	46,179,901	70,792,169	46	2,566,925	2.72%	39.48%
355	511550	TRANSMISSION POLES & FIXTURES	118,246,815	-10%	-11,824,682	67,499,058	62,572,439	38	3,465,233	2.89%	51.89%
356	511560	TRANSMISSION OH CONDUCTOR & DEVICE	132,412,085	-30%	-39,723,625	54,318,340	117,817,370	42	4,168,280	3.10%	31.56%
357	511570	TRANSMISSION UNDERGROUND CONDUIT	5,532,169	0%	0	2,043,226	3,488,943	55	102,830	1.82%	36.93%
358	511580	TRANSMISSION UG CONDUCTOR & DEVICE	7,310,115	0%	0	3,287,768	4,022,347	40	183,486	2.50%	44.98%
		TOTAL	700,556,626			257,592,358	517,906,988		19,656,083		
361	511605	DISTRIBUTION STRUCTURE & IMPROVE	24,776,039	-30%	-7,432,812	9,020,255	23,188,596	45	730,510	2.89%	28.01%
362	511607	DISTRIBUTION STATION EQUIPMENT	290,797,540	-10%	-29,079,754	80,382,852	239,494,442	38	8,540,710	2.89%	25.13%
364	511609	DISTRIBUTION POLES, TOWERS & FIXTURES	166,884,807	-90%	-150,196,327	122,941,507	194,139,627	40	8,128,611	4.75%	38.77%
365	511611	DISTRIBUTION OH CONDUCTOR & DEVICE	201,432,839	-20%	-40,286,568	57,397,396	184,322,012	32	7,753,761	3.75%	23.75%
366	511621	DISTRIBUTION UNDERGROUND CONDUIT	91,887,868	0%	0	38,135,797	53,752,071	47	1,980,462	2.13%	41.50%
367	511623	DISTRIBUTION UG CONDUCTOR & DEVICE	467,413,002	20%	93,482,600	104,123,260	269,807,142	38	9,928,035	2.11%	27.85%
369	511641	DISTRIBUTION SERVICES-OH	52,858,178	-25%	-13,214,545	31,609,429	34,463,294	40	1,687,597	3.13%	47.84%
369	511645	DISTRIBUTION SERVICES-UG	106,303,386	-25%	-26,575,846	38,760,084	94,119,148	40	3,413,687	3.13%	29.17%
373	511671	DISTRIBUTION STREET LIGHT & SG SYS	25,602,404	-20%	-5,120,481	19,312,075	11,410,810	18	1,750,604	6.67%	62.86%
		TOTAL	1,427,956,063			501,682,655	1,104,697,140		43,913,977		
390	511911	GENERAL STRUCTURES & IMPROVE	44,682,455	0%	0	12,189,879	32,492,576	45	998,424	2.22%	27.28%
		TOTAL	44,682,455			12,189,879	32,492,576		998,424		
		ELECTRIC UTILITY TOTAL	2,173,195,144			771,464,892	1,655,096,705		64,568,484		

NORTHERN STATES POWER COMPANY
1998 SUMMARY OF ANNUAL DEPRECIATION ACCRUALS

SCHEDULE I

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING PLANT BALANCE	EST. FUTURE NET SALVAGE %	EST. FUTURE NET SALVAGE AMOUNT	BEGINNING DEPRECIATION RESERVE	NET BALANCE	DEPR LIFE (YRS)	ANNUAL ACCRUAL	DEPR RATE	RESERVE RATIO
GAS											
366.2	521505	TRANSMISSION STRUCTURE & IMPROVE	628,267	0%	0	320,004	308,263	35	17,964	2.86%	50.93%
367	521507	TRANSMISSION MAINS	20,282,877	-30%	-6,084,863	10,938,717	15,429,022	45	585,947	2.89%	41.49%
369	521511	TRANSMISSION MEASURE & REG STATION E	2,815,634	-10%	-281,563	680,356	2,416,841	31	101,217	3.55%	21.97%
		TOTAL	23,726,777			11,939,078			705,128		
375	521605	DISTRIBUTION STRUCTURE & IMPROVE	181,831	0%	0	19,016	162,814	35	5,184	2.86%	10.46%
376	521607	DISTRIBUTION MAINS-METALLIC	71,534,439	-30%	-21,460,332	33,951,888	59,042,882	45	2,067,330	2.89%	36.51%
376	521608	DISTRIBUTION MAINS-PLASTIC	149,739,332	-15%	-22,460,900	38,450,168	133,750,064	45	3,935,648	2.56%	22.33%
378	521609	DISTRIBUTION MEAS & REG STATION EQ-GEI	5,196,642	-10%	-519,664	990,757	4,725,549	31	184,162	3.55%	17.33%
379	521611	DISTRIBUTION M & R STATION EQ-CITY GATE	98,619	-10%	-9,862	37,872	70,609	31	3,504	3.55%	34.91%
380	521613	DISTRIBUTION SERVICE-METALLIC	17,387,750	-50%	-8,693,875	15,914,037	10,167,587	40	629,103	3.75%	61.02%
380	521614	DISTRIBUTION SERVICE-PLASTIC	151,567,216	-50%	-75,783,608	53,617,535	173,733,289	40	5,796,018	3.75%	23.58%
	TOTAL		395,705,828			142,981,273	381,652,795		12,620,949		
390	521911	GENERAL STRUCTURES & IMPROVE	197,905	0%	0	44,438	153,467	45	10,227	2.22%	22.45%
		TOTAL	197,905			44,438	153,467		10,227		
		GAS UTILITY TOTAL	419,630,510			154,964,789	381,806,262		13,336,304		
COMMON											
390	581911	GENERAL STRUCTURES & IMPROVE	45,029,794	0%	0	14,110,035	30,919,759	45	1,019,536	2.22%	31.33%
	TOTAL		45,029,794			14,110,035	30,919,759		1,019,536		
		COMMON UTILITY TOTAL	45,029,794			14,110,035	30,919,759		1,019,536		
		AVERAGE SERVICE LIFE-TOTAL UTILITIES	2,637,855,448			940,539,715	2,067,822,726		78,924,324		

NORTHERN STATES POWER COMPANY **SCHEDULE I**
1999 SUMMARY OF ANNUAL DEPRECIATION ACCRUALS

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING PLANT BALANCE	EST. FUTURE NET SALVAGE %	EST. FUTURE NET SALVAGE AMOUNT	BEGINNING DEPRECIATION RESERVE	NET BALANCE	DEPR LIFE (YRS)	ANNUAL ACCRUAL	DEPR RATE	RESERVE RATIO
ELECTRIC											
352	511520	TRANSMISSION STRUCTURE & IMPROVE	14,691,005	0%	0	4,461,412	10,229,593	45	329,465	2.22%	30.37%
353	511530	TRANSMISSION STATION EQUIPMENT	350,155,908	0%	0	87,864,264	262,291,644	38	9,303,925	2.63%	25.09%
354	511540	TRANSMISSION TOWERS & FIXTURES	95,083,873	-25%	-23,770,968	48,770,598	70,084,244	46	2,586,085	2.72%	41.03%
355	511550	TRANSMISSION POLES & FIXTURES	122,800,056	-10%	-12,280,006	68,493,665	66,586,396	38	3,688,323	2.89%	50.71%
356	511560	TRANSMISSION OH CONDUCTOR & DEVICE	135,795,564	-30%	-40,738,669	57,034,336	119,499,898	42	4,259,627	3.10%	32.31%
357	511570	TRANSMISSION UNDERGROUND CONDUIT	5,827,786	0%	0	2,014,075	3,813,711	55	105,960	1.82%	34.56%
358	511580	TRANSMISSION UG CONDUCTOR & DEVICE	7,154,332	0%	0	2,826,642	4,327,690	40	180,068	2.50%	39.51%
		TOTAL	731,508,524			271,464,991	536,833,176		20,453,453		
361	511605	DISTRIBUTION STRUCTURE & IMPROVE	26,046,280	-30%	-7,813,884	9,669,640	24,190,524	45	753,260	2.89%	28.56%
362	511607	DISTRIBUTION STATION EQUIPMENT	306,139,629	-10%	-30,613,963	86,496,548	250,257,044	38	9,021,884	2.89%	25.69%
364	511609	DISTRIBUTION POLES, TOWERS & FIXTURES	179,094,035	-90%	-161,184,631	128,101,872	212,176,794	40	8,672,424	4.75%	37.65%
365	511611	DISTRIBUTION OH CONDUCTOR & DEVICE	213,475,826	-20%	-42,695,165	61,234,600	194,936,391	32	8,204,379	3.75%	23.90%
366	511621	DISTRIBUTION UNDERGROUND CONDUIT	94,937,857	0%	0	39,852,569	55,085,288	47	2,057,285	2.13%	41.98%
367	511623	DISTRIBUTION UG CONDUCTOR & DEVICE	492,033,657	20%	98,406,731	109,605,715	284,021,211	38	10,612,651	2.11%	27.85%
369	511641	DISTRIBUTION SERVICES-OH	55,384,145	-25%	-13,846,036	32,432,620	36,797,562	40	1,766,400	3.13%	46.85%
369	511645	DISTRIBUTION SERVICES-UG	113,331,447	-25%	-28,332,862	42,130,743	99,533,566	40	3,650,552	3.13%	29.74%
373	511671	DISTRIBUTION STREET LIGHT & SG SYS	27,242,708	-20%	-5,448,542	20,828,590	11,862,660	18	1,840,397	6.67%	63.71%
		TOTAL	1,507,685,583			530,352,896	1,168,861,039		46,579,232		
390	511911	GENERAL STRUCTURES & IMPROVE	45,289,625	0%	0	12,579,108	32,710,518	45	1,009,852	2.22%	27.77%
		TOTAL	45,289,625			12,579,108	32,710,518		1,009,852		
		ELECTRIC UTILITY TOTAL	2,284,483,732			814,396,994	1,738,404,733		68,042,537		

NORTHERN STATES POWER COMPANY **SCHEDULE I**
1999 SUMMARY OF ANNUAL DEPRECIATION ACCRUALS

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING PLANT BALANCE	EST. FUTURE NET SALVAGE %	EST. FUTURE NET SALVAGE AMOUNT	BEGINNING DEPRECIATION RESERVE	NET BALANCE	DEPR LIFE (YRS)	ANNUAL ACCRUAL	DEPR RATE	RESERVE RATIO
GAS											
366.2	521505	TRANSMISSION STRUCTURE & IMPROVE	639,847	0%	0	332,302	307,545	35	19,498	2.86%	51.93%
367	521507	TRANSMISSION MAINS	20,352,135	-30%	-6,105,641	11,524,664	14,933,111	45	587,911	2.89%	43.56%
369	521511	TRANSMISSION MEASURE & REG STATION E	3,600,700	-10%	-360,070	616,562	3,344,207	31	128,127	3.55%	15.57%
		TOTAL	24,592,682			12,473,529			735,536		
375	521605	DISTRIBUTION STRUCTURE & IMPROVE	181,831	0%	0	24,200	157,630	35	5,184	2.86%	13.31%
376	521607	DISTRIBUTION MAINS-METALLIC	73,235,135	-30%	-21,970,541	34,642,879	60,562,797	45	2,103,130	2.89%	36.39%
376	521608	DISTRIBUTION MAINS-PLASTIC	165,803,445	-15%	-24,870,517	41,599,504	149,074,457	45	4,322,113	2.56%	21.82%
378	521609	DISTRIBUTION MEAS & REG STATION EQ-GEI	5,194,005	-10%	-519,400	917,917	4,795,488	31	184,777	3.55%	16.07%
379	521611	DISTRIBUTION M & R STATION EQ-CITY GATE	98,619	-10%	-9,862	41,376	67,105	31	3,504	3.55%	38.14%
380	521613	DISTRIBUTION SERVICE-METALLIC	16,352,189	-50%	-8,176,095	15,273,878	9,254,407	40	602,940	3.75%	62.27%
380	521614	DISTRIBUTION SERVICE-PLASTIC	161,248,594	-50%	-80,624,297	57,944,432	183,928,459	40	6,158,611	3.75%	23.96%
		TOTAL	422,113,817			150,444,185	407,840,343		13,380,259		
390	521911	GENERAL STRUCTURES & IMPROVE	667,740	0%	0	54,665	613,075	45	15,028	2.22%	8.19%
		TOTAL	667,740			54,665	613,075		15,028		
		GAS UTILITY TOTAL	447,374,239			162,972,379	408,453,417		14,130,823		
COMMON											
390	581911	GENERAL STRUCTURES & IMPROVE	46,562,649	0%	0	14,517,210	32,045,439	45	1,044,632	2.22%	31.18%
		TOTAL	46,562,649			14,517,210	32,045,439		1,044,632		
		COMMON UTILITY TOTAL	46,562,649			14,517,210	32,045,439		1,044,632		
		AVERAGE SERVICE LIFE-TOTAL UTILITIES	2,778,420,620			991,886,583	2,178,903,590		83,217,992		

NORTHERN STATES POWER COMPANY
2000 SUMMARY OF ANNUAL DEPRECIATION ACCRUALS

SCHEDULE I

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING PLANT BALANCE	EST. FUTURE NET SALVAGE %	EST. FUTURE NET SALVAGE AMOUNT	BEGINNING DEPRECIATION RESERVE	NET BALANCE	DEPR LIFE (YRS)	ANNUAL ACCRUAL	DEPR RATE	RESERVE RATIO
ELECTRIC											
352	511520	TRANSMISSION STRUCTURE & IMPROVE	17,104,844	0%	0	4,788,254	12,316,590	45	357,301	2.22%	27.99%
353	511530	TRANSMISSION STATION EQUIPMENT	368,296,242	0%	0	95,695,351	272,600,891	38	9,792,515	2.63%	25.98%
354	511540	TRANSMISSION TOWERS & FIXTURES	95,300,306	-25%	-23,825,076	51,225,918	67,899,465	46	2,591,110	2.72%	43.00%
355	511550	TRANSMISSION POLES & FIXTURES	135,299,612	-10%	-13,529,961	71,667,908	77,161,665	38	3,958,862	2.89%	48.15%
356	511560	TRANSMISSION OH CONDUCTOR & DEVICE	141,362,699	-30%	-42,408,810	60,697,106	123,074,402	42	4,400,285	3.10%	33.03%
357	511570	TRANSMISSION UNDERGROUND CONDUIT	5,827,786	0%	0	2,120,035	3,707,751	55	105,960	1.82%	36.38%
358	511580	TRANSMISSION UG CONDUCTOR & DEVICE	8,325,787	0%	0	3,006,710	5,319,077	40	208,865	2.50%	36.11%
		TOTAL	771,517,275			289,201,281	562,079,841		21,414,898		
361	511605	DISTRIBUTION STRUCTURE & IMPROVE	26,121,802	-30%	-7,836,541	10,171,555	23,786,787	45	756,510	2.89%	29.95%
362	511607	DISTRIBUTION STATION EQUIPMENT	325,193,481	-10%	-32,519,348	93,579,537	264,133,292	38	9,571,385	2.89%	26.16%
364	511609	DISTRIBUTION POLES, TOWERS & FIXTURES	187,973,988	-90%	-169,176,589	133,907,316	223,243,261	40	9,056,796	4.75%	37.49%
365	511611	DISTRIBUTION OH CONDUCTOR & DEVICE	225,996,019	-20%	-45,199,204	65,105,563	206,089,659	32	8,633,591	3.75%	24.01%
366	511621	DISTRIBUTION UNDERGROUND CONDUIT	98,609,240	0%	0	41,429,550	57,179,690	47	2,151,002	2.13%	42.01%
367	511623	DISTRIBUTION UG CONDUCTOR & DEVICE	522,843,601	20%	104,568,720	115,763,741	302,511,139	38	11,253,986	2.11%	27.68%
369	511641	DISTRIBUTION SERVICES-OH	57,896,228	-25%	-14,474,057	33,517,719	38,852,566	40	1,843,239	3.13%	46.31%
369	511645	DISTRIBUTION SERVICES-UG	121,538,212	-25%	-30,384,553	45,759,307	106,163,458	40	3,912,219	3.13%	30.12%
373	511671	DISTRIBUTION STREET LIGHT & SG SYS	28,018,882	-20%	-5,603,776	22,382,954	11,239,704	18	1,888,010	6.67%	66.57%
		TOTAL	1,594,191,451			561,617,243	1,233,199,555		49,066,738		
390	511911	GENERAL STRUCTURES & IMPROVE	45,967,090	0%	0	13,571,465	32,395,625	45	1,039,687	2.22%	29.52%
		TOTAL	45,967,090			13,571,465	32,395,625		1,039,687		
		ELECTRIC UTILITY TOTAL	2,411,675,816			864,389,989	1,827,675,022		71,521,323		

Exhibit___(CWK-8)
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North Dakota Electric Rate Case
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NORTHERN STATES POWER COMPANY
2000 SUMMARY OF ANNUAL DEPRECIATION ACCRUALS

SCHEDULE I

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING PLANT BALANCE	EST. FUTURE NET SALVAGE %	EST. FUTURE NET SALVAGE AMOUNT	BEGINNING DEPRECIATION RESERVE	NET BALANCE	DEPR LIFE (YRS)	ANNUAL ACCRUAL	DEPR RATE	RESERVE RATIO
GAS											
366.2	521505	TRANSMISSION STRUCTURE & IMPROVE	698,998	0%	0	351,852	347,146	35	20,046	2.86%	50.34%
367	521507	TRANSMISSION MAINS	20,387,740	-30%	-6,116,322	12,112,575	14,391,487	45	590,479	2.89%	45.70%
369	521511	TRANSMISSION MEASURE & REG STATION E	3,705,753	-10%	-370,575	728,304	3,348,024	31	132,278	3.55%	17.87%
		TOTAL	24,792,491			13,192,731	18,086,657		742,803		
375	521605	DISTRIBUTION STRUCTURE & IMPROVE	181,831	0%	0	29,384	152,446	35	5,158	2.86%	16.16%
376	521607	DISTRIBUTION MAINS-METALLIC	73,522,851	-30%	-22,056,855	35,703,473	59,876,234	45	2,130,603	2.89%	37.35%
376	521608	DISTRIBUTION MAINS-PLASTIC	178,828,126	-15%	-26,824,219	44,811,612	160,840,733	45	4,683,066	2.56%	21.79%
378	521609	DISTRIBUTION MEAS & REG STATION EQ-GEI	5,340,866	-10%	-534,087	798,674	5,076,279	31	205,806	3.55%	13.59%
379	521611	DISTRIBUTION M & R STATION EQ-CITY GATE	98,619	-10%	-9,862	44,880	63,601	31	3,504	3.55%	41.37%
380	521613	DISTRIBUTION SERVICE-METALLIC	15,922,097	-50%	-7,961,049	15,154,866	8,728,280	40	586,322	3.75%	63.45%
380	521614	DISTRIBUTION SERVICE-PLASTIC	171,646,766	-50%	-85,823,383	62,730,951	194,739,199	40	6,587,351	3.75%	24.36%
		TOTAL	445,541,156			159,273,839	429,476,771		14,201,810		
390	521911	GENERAL STRUCTURES & IMPROVE	708,181	0%	0	52,078	656,104	45	16,879	2.22%	7.35%
		TOTAL	708,181			52,078	656,104		16879		
		GAS UTILITY TOTAL	471,041,828			172,518,648	448,219,532		14,961,492		
COMMON											
390	581911	GENERAL STRUCTURES & IMPROVE	48,451,809	0%	0	15,138,120	33,313,688	45	1,105,669	2.22%	31.24%
		TOTAL	48,451,809			15,138,120	33,313,688		1,105,669		
		COMMON UTILITY TOTAL	48,451,809			15,138,120	33,313,688		1,105,669		
		AVERAGE SERVICE LIFE-TOTAL UTILITIES	2,931,169,452			1,052,046,757	2,309,208,242		87,588,484		

VINTAGE GROUP DEPRECIATION STUDY 2003

CAPITAL ASSET ACCOUNTING

Xcel Energy
NORTHERN STATES POWER

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

LeRoy Koppendrayer	Chair
Ellen Gavin	Commissioner
Marshall Johnson	Commissioner
Gregory Scott	Commissioner
Phyllis Reha	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY D/B/A/ "XCEL ENERGY"

DOCKET NO. E, G002/D-02-1471

VINTAGE GROUP DEPRECIATION STUDY 2003

PETITION FOR APPROVAL

INTRODUCTION

Pursuant to Minnesota Statute Section 216B.11 and Minnesota Rules 7825.0500 through 7825.0900, Northern States Power Company d/b/a Xcel Energy ("Xcel Energy" or "Company" or "NSP") hereby petitions the Minnesota Public Utilities Commission ("MPUC" or "Commission") for an order approving the Vintage Group Depreciation Study 2003 to be effective January 1, 2003.

I. General Filing Information

Pursuant to Minnesota Rules 7825.3200, 7825.3500, and 7829.1300, subparagraph 3; Xcel Energy provides the following required information:

A. Name, Address, and Telephone Number of Utility

Northern States Power Company, d/b/a/ Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Christopher B. Clark
Assistant General Counsel
Xcel Energy Services
800 Nicollet Mall, Suite 2900
Minneapolis, MN 55402
(612) 215-4593

C. Date of Filing and Date Proposed Rates Will Take Effect

This petition is being filed February 1, 2003 pursuant to the Commission's order dated October 1, 2002 under Docket No. E, G002/D-02-1471. Xcel Energy requests the effective date of this change to be January 1, 2003.

D. Statute Controlling the Filing

Under Minnesota Rule 7829.0100, subparagraph 11, this request for approval of remaining lives is a "miscellaneous" filing because no determination of the Xcel Energy general revenue requirements is necessary. There is no specific statute that prescribes the amount of time the Commission has to rule on this petition.

E. Signature and Title of Utility Employee Responsible for the Filing

Lisa H. Perkett
Director, Capital Asset Accounting

Dated: February 1, 2003

F. Effect of the Change in Rates

This instant petition will not impact rates, the price of Xcel Energy gas and electric service, or the terms and conditions of service. Rather, the changes will reflect the way Xcel Energy recognizes the depreciation expenses for the relevant assets in the current year.

II. Description of and Reason for Vintage Group Depreciation Study

A. Background

The current lives and depreciation rates for general plant equipment were approved by the MPUC in Docket No. E, G002/D-97-1307 and became effective January 1, 1997. Xcel Energy personnel have reviewed the lives and rates for all plant accounts subject to vintage group depreciation and have prepared an analysis of the appropriate service life of all plant equipment to assure that the current vintage life continues to be a realistic estimate of the utilization period. The analysis included interviews with operating personnel responsible for purchase, maintenance, and utilization of the general plant equipment. For this study, the lives were compared and tested against market forces, manufacturer expected life, technological obsolescence, business planning, known causes of retirement, and changes in expected future utilization. The analysis found all current service lives to be appropriate except those discussed below. The depreciation rate discussion is broken into two parts: the service life changes and the net salvage rate changes.

The Statement of Financial Accounting Standards, Number 143, *Accounting for Asset Retirement Obligations* (SFAS 143 or ARO), was issued in June 2001. The statement is effective for fiscal years beginning after June 15, 2002. Briefly, the ARO requires that all entities provide special accounting treatment to record the legal obligations associated with the retirement of tangible long-lived assets. The Federal Energy Regulatory Commission (FERC) issued a Notice of Proposed Rulemaking on October 30, 2002. Comments and a final rule are expected midyear 2003. It is expected that there will be no asset retirement obligations associated with assets in this filing and thus no impact to the income statement or balance sheet. A more detailed discussion of the ARO and the possible affects on transmission and distribution assets is discussed in the 2003 Average Service Life filing.

B. Methodology

Below is a brief synopsis of the accounting and mathematical concepts of vintage group depreciation.

1. Basic Calculation

The vintage group method takes the original plant balance by vintage, adjusted for estimated net salvage, and divides the result by the service life. The equation can be written as follows:

Depreciation Expense = (Plant Balance By Vintage * (1 - Net Salvage)) / Service Life

The depreciation expense calculation is based on vintage installations being recovered over a stated period of time. The property is fully recovered when the accumulated depreciation is equal to the plant by vintage adjusted for estimated net salvage. An account reaches a fully recovered state one vintage at a time and at the end of each accounting period a vintage may be retired.

2. Salvage and Removal

A vintage is fully depreciated when the accumulated depreciation equals the plant balance adjusted for the net salvage estimate. Upon completion of the amortization, the vintage accumulated depreciation will be less than plant investment due to a positive net salvage expectation or greater than plant investment because of an expected overall removal cost. The salvage and removal will be assigned to a vintage on a First In First Out (FIFO) basis as the dollars are recognized. This means that the dollars will be assigned to the oldest vintage until such a time as the plant balance and accumulated depreciation equal. Then the vintage is fully recovered.

3. Gain or Loss

When all vintages, within a FERC account, have been fully depreciated and the last amount of salvage or removal has been realized, a gain or loss will be recognized. As with average service life, the gain or loss is recognized only after the entire account has been retired.

4. Retirements

Eliminating the recording of individual retirements is one of the main benefits of implementing vintage group depreciation. However, the plant balances will not reflect a retirement when it occurs. When the vintage is fully depreciated and all salvage and removal have been recognized, both the plant and accumulated depreciation will be retired, thus not having an effect on net plant.

5. Depreciation Expense

The Company will debit FERC Account 403, Depreciation Expense, for the monthly provision and credit FERC Account 108, Accumulated Provision for Depreciation.

C. Change in Service Life

An important accounting concept is matching the expense recognition of a cost item with the periods benefiting from its use. This concept requires that costs without future value should be expensed in the current period, while costs, which provide continuing identifiable usefulness over many years, should be capitalized and depreciated over those years.

FERC Accounting Release No. AR-15 granted permission to use vintage group accounting for general plant accounts. In the Annual Review of Remaining Lives 2000, Docket No. E, G002/D-00-471, Xcel Energy requested and the Commission approved extending the use of vintage year accounting to distribution line transformers (FERC 368) and distribution electric and gas meters, as well as house regulators (FERC 370, 381, and 383). The use of this depreciation technique does not capture retirement information and, as such, most mathematical methods for gauging the appropriate average service life are ineffective. Therefore, the analysis of useful life in this study is based on the forecast method.

The forecast method utilizes a review of retirement forces and future uses of the property by field personnel familiar with the equipment. By evaluating the retirement forces and the impact on the current in-service property, one can determine the appropriate recovery period. Examples of retirement forces are obsolescence, manufacturing life, wear and tear, economic impacts, technological changes, maintenance, and weather. Analysis and interviews with company personnel show that the majority of the present lives to be appropriate. The following is a discussion of those accounts where a change in service life is recommended.

1. Miscellaneous Intangible Plant (FERC Account 303)

Intangible Plant includes the cost of developing computer software. Computer software runs data routines and programs for different systems and forms the base of the computer infrastructure. Even though computer software is not included in the group of assets that AR-15 covered, it is

included in this study because its recovery is closest to this methodology. Certain criteria must be met in order to capitalize computer software. The criteria for capitalization includes the following:

- The construction cost (defined by Statement of Position 98-1, *Accounting for the Costs of Computer Software Developed or Obtained for Internal Use*) must be greater than $500,000 for a system owned wholly by Northern States Power Company (NSP), or the construction cost must be greater than $1 million for a system owned and utilized across more than one legal entity within Xcel Energy,
- The useful service life should be at least three years, and
- The amortization life should reflect estimated useful life.

Currently, computer software is split into two sub accounts, five-year amortization and 10-year amortization. Most software systems are amortized for five years with the exception of large base computer systems that are amortized over 10 years. Xcel Energy categorized the Customer Service System, the Human Resource System and the Geographical Information System in this 10-year amortization account. The Company is recommending that as of January 1, 2003, future investments in computer software be split into three sub accounts; a three year, five year and seven year amortization.

- Three Year Amortization: Rollout of workstation operating systems where the entire company is completed in a 12-month period.

- Five Year Amortization: All computer systems that qualify for capital treatment but are more specific to a smaller segment of the corporation and do not fit under the definitions of the other two amortization periods.

- Seven Year Amortization: Systems basic to the foundation of the company such as accounting, human resources or billing systems and are generally largest in cost. These systems are designed with considerable flexibility, provide for periodic upgrades to insure long-term usefulness, and are affected far less by changes in technology. They actually contain technological adaptability and are supported by the industry through maintenance contracts, upgrades and enhancements.

Most software systems should be amortized for five years with the exception of large base computer systems, where the recommendation is to use a seven-year amortization. Except for the Graphical Information System, which is discussed separately, Xcel Energy is not recommending changing the life of any software systems prior to 2002. The Company does propose to standardize the recovery pattern of software expenditures by the use the recommended 3, 5, and 7 year lives on 2002 and future classifications of computer software. The software systems that would fall within the three-year category are those for the infrastructure, such as the Windows 2000 rollout. The shorter life is recommended because of the need to replace the operating systems fairly often in order to maintain the viability of the computer equipment with the roll forward of the above software to the most current versions. Also, the lack of technical support and processing capacity requires change out more often than standard systems.

Xcel Energy currently categorizes the following systems as base to the operating structure of the Company and requests the seven-year amortization on select new software systems that went into service during 2002 and expenditures for software systems after January 1, 2003:

- General Ledger – JD Edwards
- Payroll and Benefits – HRIS: Human Resources Information System
- Property Accounting – PowerPlant
- Distribution Work Management and Supply Chain – PassPort

The systems that are recommended to be recovered over an industry standard of five years includes those systems that qualify for capital treatment but are more specific to a smaller segment of the corporation. Time reporting, tax return analysis, or employee expense tracking are examples of software in this category.

2. Accelerated Recovery For Part of GIS Software Plant Investment

The Geographical Information System (GIS) is a computerized mapping system that assists many areas of the Company with infrastructure management. The digital maps provide immediate access by operating

personnel and tie into several major software systems. GIS was installed in a series of phases over most the NSP territory in the mid to later 1990's. The system was developed to support our objectives of providing additional service to our customers while adding savings and safety through more efficient processing of information and is considered a base for utility operations. A ten-year amortization is in use for all core utility software systems.

With an operations area that is not constrained by State boundaries, Xcel Energy saw the need to have GIS software consolidated into a single system. The two existing systems were analyzed, and evaluated for use as one combined standard system that fully meets the needs of the entire organization. Through the analysis process, portions of the NSP GIS system were identified as no longer meeting the new corporate standards.

The total plant investment in the 10-year amortization account for GIS is $35.2 million. The split of GIS that has future benefits and the portion that does not meet the new corporate standards are $20.2 and $15.0 million respectively. Amortization taken through December 2002 on the portion that will not meet the new corporate standards is $7.6 million, leaving an un-recovered investment of $7.4 million ($15.0 - $7.6). The new GIS system is expected to go into service in the NSP service territory in late 2003 or early 2004. The estimated useful life of the portion of GIS that will no longer meet the new corporate standards, placed in service in 1997 and 1998, is now shorter than originally estimated. Xcel Energy requests that the remaining dollars (Plant, $15.0 million, less Reserve, $7.6 million) be spread in even monthly amounts of $310,006 over an accelerated time period of 2 years.

3. Computer Operations and Network Equipment (FERC Account 391)

Computer Operations includes mainframes, minis, direct access storage devices, tape drives, printers, and software. Network Equipment includes terminals, CRTs, personal computers, modems, printers, plotters, multiplexers, and control units.

Xcel Energy replaced the NT 4.0 operating system with Windows 2000 over a number of months in 2001 and part of 2002. Operating system change outs are expected to occur about every 3 years and can result in significant retirements in PC's and computer related equipment. The recent operating system change out and a change to new Company standards for PC's resulted in the physical retirement of all PC's less than

266 megahertz (MHz), which would all be 4 years of age or older, and many other PC's in the range of 3 to 4 years of age, 25 percent of the total in use. Many of the 266 MHz PC's were donated. In 2001, Xcel Energy was still donating some 180's and 200's but in 2002 only 266's were donated (most now 3-4 years old, some 2 year old PC's in rare situations).

Technological change and system requirements are the main retirement forces for the hardware in FERC Account 391. The average service life for PC's, which has the largest dollar investment in the account, is between three and four years. Servers have a life of around four years, while other equipment varies. The current average service life for FERC Account 391 is four years. There is continued downward pressure on the average life of this account and there is some support for a 3-year life but Xcel Energy is not convinced that a change in life is warranted at this time. The Company will continue to monitor the effects of the retirement forces on FERC Account 391.

4. Transportation Equipment (FERC Accounts 392 and 396)

These accounts include the cost of all transportation equipment used for general utility purposes. More specifically they include automobiles, light trucks, heavy trucks, various types of trailers, and power-operated equipment used in construction or repair work.

In 1991 the Xcel Energy entered into a leasing agreement with Bankers Leasing Corporation for transportation equipment. The Company kept ownership of the transportation assets that it already owned and the lease agreement was for new equipment. Gradually over the years a higher percentage of the equipment was leased, as the older Company owned equipment was retired. In 1999 significant retirements were made for the last of the older Company owned equipment. A ten-year history of the plant investment in transportation equipment can be found in Schedule E.

Today the Company leases about $80 million in transportation equipment. The agreement uses seven, eight, and ten year leases for the various types of equipment. At the end of the individual leases, or anytime during them, the Company may buy out the lease and take ownership of the equipment. The transportation account balances on the Company plant records are now completely made up of equipment that has been purchased at the end of, or sometime during the individual leases. The Company purchases select pieces of equipment with the intent of getting another two to four years of useful life out of them. Depending on the

mileage and usage each piece of equipment experiences, this second life can vary greatly.

The certified lives that the Company has been using for FERC Account 392 and 396 are primarily based upon the purchasing and ownership of new equipment. The assets that make up the plant balances in the transportation accounts today are really on a shorter second life having spent the new or first life under a lease agreement.

Xcel Energy recommends that the lives of the transportation equipment be adjusted according to the following table to properly reflect the second life of the formerly leased equipment and to better match the benefits received from the use of the assets to the time period that the expenses for them are recognized.

	Present Life	Proposed Life
Automobiles	5	3
Light Trucks	10	4
Trailers	10	4
Heavy Trucks	12	5
Power Operated Equipment	10	4

The Company has leased transportation equipment from Bankers Leasing Corporation for several years. Should Xcel Energy change its present business practices and begin moving back to the direct purchase of new equipment, the Company will submit a request to adjust the recovery of new transportation property.

5. Line Transformers and Line Transformers-Other (FERC Account 368)

The Line Transformers account includes the installed cost of overhead and underground line transformers and voltage regulators for use in transforming electricity to the customer's voltage. Other items included in this account are the initial costs of installation, transformer fused cutouts, and transformer lightning arresters. The cost of removing and resetting line transformers is not charged to this account but rather to the appropriate line expense account.

The use of vintage group accounting on FERC Account 368 was granted as of January 1, 2000, under Docket No. E, G002/D-00-471. Individual assets are no longer tracked and the life and salvage analysis of this account has now moved to the forecast method.

The industry has been pressing transformer manufacturers for some time to keep costs down. As a result, the manufacturers have been using less steel and transformers are built with lower overall margins. Margin refers to how much the transformer is overbuilt to handle additional load. Under normal conditions a transformer will run cool. An increase of customer load growth and harsh weather conditions are two examples of increased demand that lead to stress on the system. This stress causes all equipment, including transformers, to work harder and incur more wear and tear. A higher margin would still allow the transformer to run at relatively cooler temperatures under higher than normal stress. Lower margins will cause the transformer to heat up more quickly under similar stress resulting in a faster deterioration of insulation, materials, and result in earlier failure rates.

Company personnel have indicated that the overall service life of line transformers is becoming shorter. The average service life is presently 35 years. Xcel Energy recommends the recognition of the downward trend in the average service life of line transformers through a change in life to 32 years.

6. Electric and Gas Meters (FERC Accounts 370 and 381)

These accounts include the installed cost of meters or devices and appurtenances thereto, used in measuring electricity and gas delivered to customers. It also includes costs to hang the meter and the installation of associated equipment.

Since the invention of the microprocessor some 25 years ago, advances in the technology have been exponential and now allow them to be found in new electric and gas meters. Newer electronic meters that continue to experience a rapid change in technology are replacing the old electro-mechanical meters.

The forecast method looks at information from a variety of sources. Manufacturers, while not necessarily sharing all of the data, indicate a life of 25 years for these new meters. The availability of parts and vendor support

of technology that becomes obsolete quickly is a concern and is questionable. The industry and company personnel are not as optimistic. The actual life may be as short as 10 to 15 years.

Almost all Company meters now use an automatic meter-recording module. The life of the module is expected to be 7 to 10 years. The module, when not an integral part of a particular manufacturers meter, is classified to the FERC Account 397, Communication Equipment, and does not directly affect the average service life of the electric or gas meter accounts. However, the module has an indirect association with meter life. When this device fails the meter may keep on running or may fail itself. Assuming that the meter keeps on working, its life still might ultimately be determined by economics. The original cost of a meter is quite low at $20 to $40 and a decision of repair or retire must be made.

At this time the Company does not have enough experience to construct an accurate forecast of what average service life should ultimately be used on the electric and gas meter accounts. Additional studies and field experience of the new technology and equipment is necessary. Based on information from manufacturers Xcel Energy recommends changing the average service lives of electric and gas meters from 25 and 35 years, to 20 and 25 years respectively. The Company will continue to monitor the technological advancements and the failure or removal history of the new electric and gas meters for possible additional service life adjustments.

D. Changes in Net Salvage Rate

Salvage values in plant equipment using the vintage group method continue to decline and are in effect trending down towards zero. The majority of this equipment is used until it wears out or is obsolete to the point where it no longer benefits the Company or its customers. Since they are easily removed, the salvage or scrap value may only cover the costs associated with removal and disposing of the assets.

Xcel Energy has reviewed the net salvage rates in use for all property using the vintage group method. The Company recommends that the salvage percents for all vintage group accounts are appropriate and remain as last certified but does present discussion below of the salvage rates presently in use for select accounts.

1. Office Furniture and Equipment (FERC Account 391)

Office Furniture and Equipment includes desks, chairs, cabinets, calculators, modular furniture, copy machines, and other office equipment. Office furniture itself, consisting of chairs, desks, and modular furniture, make up the largest percent of the investment in office furniture and equipment.

The current salvage rate for FERC Account 391 is 5%; however, interviews with company personnel indicate a downward trend in the amount of salvage dollars received for the property in this account. It has become increasingly difficult to sell used furniture. A major portion of the modular furniture is donated to non-profit organizations. The older metal desks are usually sold for scrap only. Other furniture that is forty to fifty years old is obsolete and has no value. Although the total salvage value currently received is still positive it is now less than 5 percent. The decreasing value of amounts recovered will need to be reexamined in the next 5-year study to determine if the salvage should be adjusted to 0%. Xcel Energy recommends that the salvage remain at 5% for FERC Account 391.

2. Transportation Equipment (FERC Accounts 392 and 396)

These accounts include the cost of all transportation equipment used for general utility purposes. More specifically they include automobiles, light trucks, heavy trucks, various types of trailers, and power-operated equipment used in construction or repair work.

The transportation account balances on the Company plant records are now completely made up of equipment that has been purchased at the end of, or sometime during the individual leases. The additional two to four years that the Company then owns the equipment could result in slightly lower salvage dollars realized when sold or scrapped at the end of the second life. However company personnel have stated that this has yet to be shown true. Xcel Energy recommends that the salvage for all transportation equipment remain as last certified.

E. Attached Schedules

The following schedules have been included in support of this review and the recommended changes:

Schedules	
A	Comparison of Present and Proposed Depreciation Rates
B	Comparison of Present and Proposed Accruals – By Vintage
C	Comparison of Present and Proposed Accruals – By Account
D	Proposed Lives, Net Salvage Rates, and Depreciation Rates
E	Transportation Equipment Ten Year History 1992 - 2001
F	Plant In Service
G	Accumulated Depreciation
H	Annual Depreciation Accrual Determination

III. Conclusion

This study proposes shortening some lives of certain plant assets using the vintage life method to better reflect the makeup of the assets within the accounts, the use of 3, 5, and 7-years lives on 2002 and future investments in computer software, and the shortening of the recovery period for a portion of GIS. The study also recommends that the net salvage percents for all general plant accounts remain as last certified. The annual overall impact of this study is an increase of $6,714,569. The impact on annual depreciation expense for recommended changes to the lives of vintage group assets would be an approximate increase of $3,720,067 for GIS and an increase of $1,606,555 for all asset accounts other than transportation. Clearings for transportation assets will increase by approximately $1,387,947. This is a net effect of shortened service lives. Xcel Energy requests the effective date for this change to be January 1, 2003.

IV. Miscellaneous Information

A. Correspondence

All correspondence concerning this depreciation study should be sent to each of the following:

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B. Proprietary Information

The document, including all schedules, does not contain any proprietary information.

SCHEDULE A
COMPARISON OF PRESENT AND PROPOSED DEPRECIATION RATES

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Depreciation Rates

Schedule A

Electric Utility

FERC Acct	Account Description	Present Average Life	Present Net Salvage	Present Annual Rate	Proposed Average Life	Proposed Net Salvage	Proposed Annual Rate	Annual Rate Percent Change
Intangible Plant								
303	Computer Software - 5 Year	5	0	20.00	5	0	20.00	0.00
General Plant								
391	Office Furniture and Equipment	18	5	5.28	18	5	5.28	0.00
391	Network Equipment	4	0	25.00	4	0	25.00	0.00
392	Automobiles	5	10	18.00	3	10	30.00	12.00
392	Light Trucks	10	10	9.00	4	10	22.50	13.50
392	Trailers	10	10	9.00	4	10	22.50	13.50
392	Heavy Trucks	12	5	7.92	5	5	19.00	11.08
393	Stores Equipment	20	5	4.75	20	5	4.75	0.00
394	Tools, Shop, and Garage Equipment	15	0	6.67	15	0	6.67	0.00
394	Hand Held Meter Readers	5	0	20.00	5	0	20.00	0.00
395	Laboratory Equipment	10	0	10.00	10	0	10.00	0.00
396	Power Operated Equipment	10	10	9.00	4	10	22.50	13.50
397	Communication & Telecommunication Equipment	9	0	11.11	9	0	11.11	0.00
398	Miscellaneous Equipment	15	0	6.67	15	0	6.67	0.00
Distribution Plant (Vintage Group Treatment)								
368	Line Transformers	35	10	2.57	32	10	2.81	0.24
368	Line Capacitors	25	0	4.00	25	0	4.00	0.00
370	Meters	25	0	4.00	20	0	5.00	1.00

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Depreciation Rates

Schedule A

Gas Utility

FERC Acct	Account Description	Present Average Life	Present Net Salvage	Present Annual Rate	Proposed Average Life	Proposed Net Salvage	Proposed Annual Rate	Annual Rate Percent Change
Intangible Plant								
303	Computer Software - 5 Year	5	0	20.00	5	0	20.00	0.00
General Plant								
391	Office Furniture and Equipment	18	5	5.28	18	5	5.28	0.00
391	Network Equipment	4	0	25.00	4	0	25.00	0.00
392	Automobiles	5	10	18.00	3	10	30.00	12.00
392	Light Trucks	10	10	9.00	4	10	22.50	13.50
392	Trailers	10	10	9.00	4	10	22.50	13.50
392	Heavy Trucks	12	5	7.92	5	5	19.00	11.08
394	Tools, Shop, and Garage Equipment	15	0	6.67	15	0	6.67	0.00
395	Laboratory Equipment	10	0	10.00	10	0	10.00	0.00
396	Power Operated Equipment	10	10	9.00	4	10	22.50	13.50
397	Communication & Telecommunication Equipment	9	0	11.11	9	0	11.11	0.00
398	Miscellaneous Equipment	15	0	6.67	15	0	6.67	0.00
Distribution Plant (Vintage Group Treatment)								
381	Meters	35	-15	3.29	25	-15	4.60	1.31
381	Telemetering	8	0	12.50	8	0	12.50	0.00
383	House Regulators	45	-10	2.44	45	-10	2.44	0.00

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Depreciation Rates

Schedule A

Common Utility

FERC Acct	Account Description	Present Average Life	Present Net Salvage	Present Annual Rate	Proposed Average Life	Proposed Net Salvage	Proposed Annual Rate	Annual Rate Percent Change
Intangible Plant								
303	Computer Software - 5 Year	5	0	20.00	5	0	20.00	0.00
303	Computer Software - 5 Year	5	0	20.00	7	0	14.29	-5.71
303	Computer Software - 10 Year	10	0	10.00	10	0	10.00	0.00
General Plant								
391	Office Furniture and Equipment	18	5	5.28	18	5	5.28	0.00
391	Network Equipment	4	0	25.00	4	0	25.00	0.00
392	Automobiles	5	10	18.00	3	10	30.00	12.00
392	Light Trucks	10	10	9.00	4	10	22.50	13.50
392	Trailers	10	10	9.00	4	10	22.50	13.50
392	Heavy Trucks	12	5	7.92	5	5	19.00	11.08
393	Stores Equipment	20	5	4.75	20	5	4.75	0.00
394	Tools, Shop, and Garage Equipment	15	0	6.67	15	0	6.67	0.00
395	Laboratory Equipment	10	0	10.00	10	0	10.00	0.00
396	Power Operated Equipment	10	10	9.00	4	10	22.50	13.50
397	Communication & Telecommunication Equipmen	9	0	11.11	9	0	11.11	0.00
398	Miscellaneous Equipment	15	0	6.67	15	0	6.67	0.00

SCHEDULE B

COMPARISON OF PRESENT AND PROPOSED ACCRUALS – BY VINTAGE

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Accruals by Vintage

Schedule B

Electric Utility

FERC Acct	Account Description		Plant Balance 1/1/2003	Present Annual Rate	Present Annual Accrual	Proposed Annual Rate	Proposed Annual Accrual	Proposed Less Present Accrual
Intangible Plant								
303	Computer Software - 5 Year		9,334,586	20.00	1,866,917	20.00	1,866,917	-
	Total		9,334,586		1,866,917		1,866,917	-
General Plant								
391	Office Furniture and Equipment	1964	92	5.28	-	5.28	-	-
391	Office Furniture and Equipment	1966	151	5.28	-	5.28	-	-
391	Office Furniture and Equipment	1968	3,404	5.28	-	5.28	-	-
391	Office Furniture and Equipment	1969	2,042	5.28	-	5.28	-	-
391	Office Furniture and Equipment	1970	1,792	5.28	-	5.28	-	-
391	Office Furniture and Equipment	1971	847	5.28	-	5.28	-	-
391	Office Furniture and Equipment	1972	3,076	5.28	-	5.28	-	-
391	Office Furniture and Equipment	1973	7,910	5.28	-	5.28	-	-
391	Office Furniture and Equipment	1974	18,978	5.28	-	5.28	-	-
391	Office Furniture and Equipment	1975	5,643	5.28	-	5.28	-	-
391	Office Furniture and Equipment	1976	15,885	5.28	-	5.28	-	-
391	Office Furniture and Equipment	1977	9,065	5.28	-	5.28	-	-
391	Office Furniture and Equipment	1978	22,510	5.28	180	5.28	180	-
391	Office Furniture and Equipment	1979	11,414	5.28	124	5.28	124	-
391	Office Furniture and Equipment	1980	32,754	5.28	1,729	5.28	1,729	-
391	Office Furniture and Equipment	1981	57,881	5.28	3,055	5.28	3,055	-
391	Office Furniture and Equipment	1982	82,513	5.28	4,355	5.28	4,355	-
391	Office Furniture and Equipment	1983	144,033	5.28	7,602	5.28	7,602	-
391	Office Furniture and Equipment	1984	238,156	5.28	12,569	5.28	12,569	-
391	Office Furniture and Equipment	1985	496,353	5.28	26,196	5.28	26,196	-
391	Office Furniture and Equipment	1986	198,034	5.28	10,452	5.28	10,452	-
391	Office Furniture and Equipment	1987	54,949	5.28	2,900	5.28	2,900	-
391	Office Furniture and Equipment	1988	171,192	5.28	9,035	5.28	9,035	-
391	Office Furniture and Equipment	1989	743,214	5.28	39,225	5.28	39,225	-
391	Office Furniture and Equipment	1990	217,376	5.28	11,473	5.28	11,473	-
391	Office Furniture and Equipment	1991	143,786	5.28	7,589	5.28	7,589	-
391	Office Furniture and Equipment	1992	751,113	5.28	39,642	5.28	39,642	-
391	Office Furniture and Equipment	1993	260,198	5.28	13,733	5.28	13,733	-
391	Office Furniture and Equipment	1994	69,717	5.28	3,680	5.28	3,680	-

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Accruals by Vintage

Schedule B

Electric Utility

FERC Acct	Account Description		Plant Balance 1/1/2003	Present Annual Rate	Present Annual Accrual	Proposed Annual Rate	Proposed Annual Accrual	Proposed Less Present Accrual
391	Office Furniture and Equipment	1995	84,579	5.28	4,464	5.28	4,464	-
391	Office Furniture and Equipment	1996	78,484	5.28	4,142	5.28	4,142	-
391	Office Furniture and Equipment	1997	449,470	5.28	23,722	5.28	23,722	-
391	Office Furniture and Equipment	1998	93,052	5.28	4,911	5.28	4,911	-
391	Office Furniture and Equipment	1999	260,029	5.28	13,724	5.28	13,724	-
391	Office Furniture and Equipment	2000	421,483	5.28	22,245	5.28	22,245	-
391	Office Furniture and Equipment	2001	824,989	5.28	43,541	5.28	43,541	-
391	Office Furniture and Equipment	2002	620,440	5.28	32,745	5.28	32,745	-
	Total		6,596,604		343,032		343,032	-
391	Network Equipment	1993	62,519	25.00	-	25.00	-	-
391	Network Equipment	1995	5,238,796	25.00	-	25.00	-	-
391	Network Equipment	1996	3,058,878	25.00	-	25.00	-	-
391	Network Equipment	1997	3,685,290	25.00	-	25.00	-	-
391	Network Equipment	1998	4,408,761	25.00	-	25.00	-	-
391	Network Equipment	1999	3,665,195	25.00	449,712	25.00	449,712	-
391	Network Equipment	2000	3,343,740	25.00	835,935	25.00	835,935	-
391	Network Equipment	2001	3,686,505	25.00	921,626	25.00	921,626	-
391	Network Equipment	2002	246,748	25.00	61,687	25.00	61,687	-
	Total		27,396,432		2,268,960		2,268,960	-
392	Automobiles		-		-		-	-
392	Light Trucks	1990	243,242	9.00	21,892	22.50	54,730	32,838
392	Light Trucks	1991	44,984	9.00	4,049	22.50	10,121	6,073
392	Light Trucks	1999	136,492	9.00	12,284	22.50	30,711	18,426
	Total		424,718		38,225		95,562	57,337
392	Trailers	1969	12,402	9.00	1,116	22.50	2,790	1,674
392	Trailers	1978	41,858	9.00	3,767	22.50	9,418	5,651
392	Trailers	1984	7,711	9.00	694	22.50	1,735	1,041
392	Trailers	1985	80,224	9.00	7,220	22.50	18,050	10,830
392	Trailers	1986	60,920	9.00	5,483	22.50	13,707	8,224
392	Trailers	1987	195,953	9.00	17,636	22.50	44,089	26,454
392	Trailers	1988	22,583	9.00	2,032	22.50	5,081	3,049
392	Trailers	1989	49,028	9.00	4,413	22.50	11,031	6,619
392	Trailers	1990	176,446	9.00	15,880	22.50	39,700	23,820

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Accruals by Vintage

Schedule B

Electric Utility

FERC Acct	Account Description		Plant Balance 1/1/2003	Present Annual Rate	Present Annual Accrual	Proposed Annual Rate	Proposed Annual Accrual	Proposed Less Present Accrual
392	Trailers	1991	19,877	9.00	1,789	22.50	4,472	2,683
392	Trailers	1992	42,072	9.00	3,786	22.50	9,466	5,680
392	Trailers	1993	86,441	9.00	7,780	22.50	19,449	11,670
392	Trailers	1995	10,449	9.00	940	22.50	2,351	1,411
392	Trailers	1999	364,741	9.00	32,827	22.50	82,067	49,240
	Total		1,170,705		105,363		263,409	158,045
392	Heavy Trucks	1988	9,214,883	7.92	729,512	19.00	1,750,828	1,021,316
392	Heavy Trucks	1990	2,025,859	7.92	43,823	19.00	43,823	-
392	Heavy Trucks	1991	461,154	7.92	-	19.00	-	-
392	Heavy Trucks	1992	863	7.92	59	19.00	59	-
392	Heavy Trucks	1993	133,516	7.92	10,570	19.00	25,368	14,798
	Total		11,836,276		783,964		1,820,078	1,036,114
393	Stores Equipment	1958	25,565	4.75	-	4.75	-	-
393	Stores Equipment	1960	10,975	4.75	-	4.75	-	-
393	Stores Equipment	1961	9,093	4.75	-	4.75	-	-
393	Stores Equipment	1962	8,354	4.75	-	4.75	-	-
393	Stores Equipment	1963	4,464	4.75	-	4.75	-	-
393	Stores Equipment	1964	11,061	4.75	-	4.75	-	-
393	Stores Equipment	1965	8,100	4.75	-	4.75	-	-
393	Stores Equipment	1966	1,385	4.75	-	4.75	-	-
393	Stores Equipment	1967	18,723	4.75	-	4.75	-	-
393	Stores Equipment	1968	60,603	4.75	-	4.75	-	-
393	Stores Equipment	1969	26,399	4.75	-	4.75	-	-
393	Stores Equipment	1970	17,532	4.75	-	4.75	-	-
393	Stores Equipment	1971	9,183	4.75	-	4.75	-	-
393	Stores Equipment	1973	2,833	4.75	-	4.75	-	-
393	Stores Equipment	1974	17,754	4.75	-	4.75	-	-
393	Stores Equipment	1976	65,492	4.75	3,111	4.75	3,111	-
393	Stores Equipment	1977	34,744	4.75	1,650	4.75	1,650	-
393	Stores Equipment	1978	22,529	4.75	1,070	4.75	1,070	-
393	Stores Equipment	1979	41,297	4.75	1,962	4.75	1,962	-
393	Stores Equipment	1980	25,883	4.75	1,229	4.75	1,229	-
393	Stores Equipment	1981	138,910	4.75	6,598	4.75	6,598	-
393	Stores Equipment	1982	43,027	4.75	2,044	4.75	2,044	-
393	Stores Equipment	1983	94,463	4.75	4,487	4.75	4,487	-

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Accruals by Vintage

Schedule B

Electric Utility

FERC Acct	Account Description		Plant Balance 1/1/2003	Present Annual Rate	Present Annual Accrual	Proposed Annual Rate	Proposed Annual Accrual	Proposed Less Present Accrual
393	Stores Equipment	1984	46,689	4.75	2,218	4.75	2,218	-
393	Stores Equipment	1985	30,607	4.75	1,454	4.75	1,454	-
393	Stores Equipment	1987	68,693	4.75	3,263	4.75	3,263	-
393	Stores Equipment	1988	34,429	4.75	1,635	4.75	1,635	-
393	Stores Equipment	1989	47,356	4.75	2,249	4.75	2,249	-
393	Stores Equipment	1990	573,331	4.75	27,233	4.75	27,233	-
393	Stores Equipment	1991	216,975	4.75	10,306	4.75	10,306	-
393	Stores Equipment	1992	44,500	4.75	2,114	4.75	2,114	-
393	Stores Equipment	1993	63,929	4.75	3,037	4.75	3,037	-
393	Stores Equipment	1994	2,985	4.75	142	4.75	142	-
393	Stores Equipment	1995	11,079	4.75	526	4.75	526	-
393	Stores Equipment	1996	28,015	4.75	1,331	4.75	1,331	-
393	Stores Equipment	1997	26,668	4.75	1,267	4.75	1,267	-
393	Stores Equipment	1998	7,460	4.75	354	4.75	354	-
393	Stores Equipment	2000	92,362	4.75	4,387	4.75	4,387	-
393	Stores Equipment	2002	8,157	4.75	387	4.75	387	-
	Total		2,001,604		84,055		84,055	-
394	Tools, Shop, and Garage Equipment	1974	116,852	6.67	3,523	6.67	3,523	-
394	Tools, Shop, and Garage Equipment	1975	201,791	6.67	9,019	6.67	9,019	-
394	Tools, Shop, and Garage Equipment	1977	144,268	6.67	2,331	6.67	2,331	-
394	Tools, Shop, and Garage Equipment	1978	129,092	6.67	5,045	6.67	5,045	-
394	Tools, Shop, and Garage Equipment	1979	96,429	6.67	6,013	6.67	6,013	-
394	Tools, Shop, and Garage Equipment	1980	255,478	6.67	17,032	6.67	17,032	-
394	Tools, Shop, and Garage Equipment	1981	347,923	6.67	23,195	6.67	23,195	-
394	Tools, Shop, and Garage Equipment	1982	689,486	6.67	45,966	6.67	45,966	-
394	Tools, Shop, and Garage Equipment	1983	341,242	6.67	22,749	6.67	22,749	-
394	Tools, Shop, and Garage Equipment	1984	384,148	6.67	25,610	6.67	25,610	-
394	Tools, Shop, and Garage Equipment	1985	414,326	6.67	27,622	6.67	27,622	-
394	Tools, Shop, and Garage Equipment	1986	395,904	6.67	26,394	6.67	26,394	-
394	Tools, Shop, and Garage Equipment	1987	306,283	6.67	20,419	6.67	20,419	-
394	Tools, Shop, and Garage Equipment	1988	777,875	6.67	51,858	6.67	51,858	-
394	Tools, Shop, and Garage Equipment	1989	5,243,926	6.67	349,595	6.67	349,595	-
394	Tools, Shop, and Garage Equipment	1990	1,636,422	6.67	109,095	6.67	109,095	-
394	Tools, Shop, and Garage Equipment	1991	781,506	6.67	52,100	6.67	52,100	-
394	Tools, Shop, and Garage Equipment	1992	1,502,074	6.67	100,138	6.67	100,138	-
394	Tools, Shop, and Garage Equipment	1993	2,588,488	6.67	172,566	6.67	172,566	-

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Accruals by Vintage

Schedule B

Electric Utility

FERC Acct	Account Description		Plant Balance 1/1/2003	Present Annual Rate	Present Annual Accrual	Proposed Annual Rate	Proposed Annual Accrual	Proposed Less Present Accrual
394	Tools, Shop, and Garage Equipment	1994	2,165,925	6.67	144,395	6.67	144,395	-
394	Tools, Shop, and Garage Equipment	1995	1,572,740	6.67	104,849	6.67	104,849	-
394	Tools, Shop, and Garage Equipment	1996	1,648,533	6.67	109,902	6.67	109,902	-
394	Tools, Shop, and Garage Equipment	1997	1,381,516	6.67	109,902	6.67	109,902	-
394	Tools, Shop, and Garage Equipment	1998	1,927,131	6.67	92,101	6.67	92,101	-
394	Tools, Shop, and Garage Equipment	1999	2,128,738	6.67	128,475	6.67	128,475	-
394	Tools, Shop, and Garage Equipment	2000	2,303,319	6.67	153,555	6.67	153,555	-
394	Tools, Shop, and Garage Equipment	2001	1,186,222	6.67	79,081	6.67	79,081	-
394	Tools, Shop, and Garage Equipment	2002	2,408,233	6.67	160,549	6.67	160,549	-
	Total		33,075,870		2,153,080		2,153,080	-
394	Hand Held Meter Readers		-		-		-	-
395	Laboratory Equipment	1980	203,143	10.00	-	10.00	-	-
395	Laboratory Equipment	1986	390,587	10.00	-	10.00	-	-
395	Laboratory Equipment	1987	19,316	10.00	-	10.00	-	-
395	Laboratory Equipment	1988	366,146	10.00	-	10.00	-	-
395	Laboratory Equipment	1989	439,705	10.00	-	10.00	-	-
395	Laboratory Equipment	1990	630,816	10.00	63,082	10.00	63,082	-
395	Laboratory Equipment	1991	797,571	10.00	79,757	10.00	79,757	-
395	Laboratory Equipment	1992	420,174	10.00	42,017	10.00	42,017	-
395	Laboratory Equipment	1993	437,363	10.00	43,736	10.00	43,736	-
395	Laboratory Equipment	1994	236,767	10.00	23,677	10.00	23,677	-
395	Laboratory Equipment	1995	199,808	10.00	19,981	10.00	19,981	-
395	Laboratory Equipment	1996	264,373	10.00	26,437	10.00	26,437	-
395	Laboratory Equipment	1997	301,648	10.00	30,165	10.00	30,165	-
395	Laboratory Equipment	1998	601,436	10.00	60,144	10.00	60,144	-
395	Laboratory Equipment	1999	372,410	10.00	37,241	10.00	37,241	-
395	Laboratory Equipment	2000	664,065	10.00	66,407	10.00	66,407	-
395	Laboratory Equipment	2001	861,228	10.00	86,123	10.00	86,123	-
395	Laboratory Equipment	2002	40,238	10.00	4,024	10.00	4,024	-
	Total		7,246,794		582,790		582,790	-
396	Power Operated Equipment	1988	737,409	9.00	-	22.50	-	-
396	Power Operated Equipment	1989	650,271	9.00	-	22.50	-	-
396	Power Operated Equipment	1990	333,073	9.00	-	22.50	-	-
396	Power Operated Equipment	1991	8	9.00	-	22.50	-	-

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Accruals by Vintage

Schedule B

Electric Utility

FERC Acct	Account Description		Plant Balance 1/1/2003	Present Annual Rate	Present Annual Accrual	Proposed Annual Rate	Proposed Annual Accrual	Proposed Less Present Accrual
396	Power Operated Equipment	1992	37,190	9.00	-	22.50	-	-
396	Power Operated Equipment	1998	3,419	9.00	308	22.50	770	462
396	Power Operated Equipment	2000	3,333	9.00	300	22.50	750	450
396	Power Operated Equipment	2002	26,016	9.00	2,341	22.50	5,854	3,512
	Total		1,790,719		2,949		7,373	4,424
397	Communication & Telecommunication Equipment	1984	973,978	11.11	-	11.11	-	-
397	Communication & Telecommunication Equipment	1985	739,655	11.11	-	11.11	-	-
397	Communication & Telecommunication Equipment	1987	204,396	11.11	-	11.11	-	-
397	Communication & Telecommunication Equipment	1988	987,016	11.11	-	11.11	-	-
397	Communication & Telecommunication Equipment	1989	87,671	11.11	-	11.11	-	-
397	Communication & Telecommunication Equipment	1990	644,704	11.11	71,634	11.11	71,634	-
397	Communication & Telecommunication Equipment	1993	407,875	11.11	45,319	11.11	45,319	-
397	Communication & Telecommunication Equipment	1994	2,215,140	11.11	246,127	11.11	246,127	-
397	Communication & Telecommunication Equipment	1995	3,513,829	11.11	390,425	11.11	390,425	-
397	Communication & Telecommunication Equipment	1996	2,172,133	11.11	241,348	11.11	241,348	-
397	Communication & Telecommunication Equipment	1997	11,520,471	11.11	1,280,052	11.11	1,280,052	-
397	Communication & Telecommunication Equipment	1998	851,521	11.11	94,613	11.11	94,613	-
397	Communication & Telecommunication Equipment	1999	2,098,162	11.11	233,129	11.11	233,129	-
397	Communication & Telecommunication Equipment	2000	580,922	11.11	64,547	11.11	64,547	-
397	Communication & Telecommunication Equipment	2001	128,696	11.11	14,300	11.11	14,300	-
397	Communication & Telecommunication Equipment	2002	1,443,558	11.11	160,395	11.11	160,395	-
	Total		28,569,727		2,841,890		2,841,890	-
398	Miscellaneous Equipment	1984	5,643	6.67	-	6.67	-	-
398	Miscellaneous Equipment	1985	27,038	6.67	-	6.67	-	-
398	Miscellaneous Equipment	1986	2,162	6.67	-	6.67	-	-
398	Miscellaneous Equipment	1987	1,349	6.67	-	6.67	-	-
398	Miscellaneous Equipment	1988	19,118	6.67	-	6.67	-	-
398	Miscellaneous Equipment	1993	84,227	6.67	5,615	6.67	5,615	-
398	Miscellaneous Equipment	1994	51,835	6.67	3,456	6.67	3,456	-
398	Miscellaneous Equipment	1995	6,293	6.67	420	6.67	420	-
398	Miscellaneous Equipment	1996	10,058	6.67	671	6.67	671	-
398	Miscellaneous Equipment	1997	3,654	6.67	244	6.67	244	-
398	Miscellaneous Equipment	1998	16,221	6.67	1,081	6.67	1,081	-
398	Miscellaneous Equipment	1999	11,519	6.67	768	6.67	768	-
398	Miscellaneous Equipment	2000	66,643	6.67	4,443	6.67	4,443	-
398	Miscellaneous Equipment	2001	163,699	6.67	10,913	6.67	10,913	-

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398	Miscellaneous Equipment	2002	142,449	6.67	9,497	6.67	9,497	-
	Total		611,908		37,107		37,107	-
	Total General Plant		120,721,355		9,241,415		10,497,335	1,255,920
368	Line Transformers	1911	251	2.57	-	2.81	-	-
368	Line Transformers	1912	331	2.57	-	2.81	-	-
368	Line Transformers	1913	580	2.57	-	2.81	-	-
368	Line Transformers	1914	394	2.57	-	2.81	-	-
368	Line Transformers	1915	435	2.57	-	2.81	-	-
368	Line Transformers	1916	1,384	2.57	-	2.81	-	-
368	Line Transformers	1917	2,213	2.57	-	2.81	-	-
368	Line Transformers	1919	1,070	2.57	-	2.81	-	-
368	Line Transformers	1920	1,053	2.57	-	2.81	-	-
368	Line Transformers	1921	1,753	2.57	-	2.81	-	-
368	Line Transformers	1922	3,196	2.57	-	2.81	-	-
368	Line Transformers	1923	12,869	2.57	-	2.81	-	-
368	Line Transformers	1924	9,411	2.57	-	2.81	-	-
368	Line Transformers	1925	8,474	2.57	-	2.81	-	-
368	Line Transformers	1926	3,463	2.57	-	2.81	-	-
368	Line Transformers	1927	2,524	2.57	-	2.81	-	-
368	Line Transformers	1928	3,330	2.57	-	2.81	-	-
368	Line Transformers	1929	16,703	2.57	-	2.81	-	-
368	Line Transformers	1931	18,334	2.57	-	2.81	-	-
368	Line Transformers	1932	10,301	2.57	-	2.81	-	-
368	Line Transformers	1933	11,380	2.57	-	2.81	-	-
368	Line Transformers	1934	7,096	2.57	-	2.81	-	-
368	Line Transformers	1935	3,045	2.57	-	2.81	-	-
368	Line Transformers	1936	20,299	2.57	-	2.81	-	-
368	Line Transformers	1937	68,725	2.57	-	2.81	-	-
368	Line Transformers	1938	29,182	2.57	-	2.81	-	-
368	Line Transformers	1939	17,243	2.57	-	2.81	-	-
368	Line Transformers	1940	8,078	2.57	-	2.81	-	-
368	Line Transformers	1941	31,602	2.57	-	2.81	-	-
368	Line Transformers	1942	20,173	2.57	-	2.81	-	-
368	Line Transformers	1943	11,768	2.57	-	2.81	-	-

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368	Line Transformers	1944	11,895	2.57	-	2.81	-	-
368	Line Transformers	1945	40,970	2.57	-	2.81	-	-
368	Line Transformers	1946	41,090	2.57	-	2.81	-	-
368	Line Transformers	1947	71,880	2.57	-	2.81	-	-
368	Line Transformers	1948	93,689	2.57	-	2.81	-	-
368	Line Transformers	1949	212,562	2.57	-	2.81	-	-
368	Line Transformers	1950	204,834	2.57	-	2.81	-	-
368	Line Transformers	1951	242,923	2.57	-	2.81	-	-
368	Line Transformers	1952	277,578	2.57	-	2.81	-	-
368	Line Transformers	1953	330,548	2.57	-	2.81	-	-
368	Line Transformers	1954	487,125	2.57	-	2.81	-	-
368	Line Transformers	1955	595,784	2.57	-	2.81	-	-
368	Line Transformers	1956	701,222	2.57	-	2.81	-	-
368	Line Transformers	1957	1,005,166	2.57	-	2.81	-	-
368	Line Transformers	1958	1,015,086	2.57	-	2.81	-	-
368	Line Transformers	1959	1,462,291	2.57	-	2.81	-	-
368	Line Transformers	1960	1,556,980	2.57	-	2.81	-	-
368	Line Transformers	1961	1,409,006	2.57	-	2.81	-	-
368	Line Transformers	1962	2,408,053	2.57	-	2.81	-	-
368	Line Transformers	1963	1,694,222	2.57	-	2.81	-	-
368	Line Transformers	1964	1,715,570	2.57	-	2.81	-	-
368	Line Transformers	1965	1,819,563	2.57	-	2.81	-	-
368	Line Transformers	1966	2,170,461	2.57	-	2.81	-	-
368	Line Transformers	1967	3,513,463	2.57	-	2.81	-	-
368	Line Transformers	1968	2,984,335	2.57	-	2.81	-	-
368	Line Transformers	1969	2,969,991	2.57	-	2.81	-	-
368	Line Transformers	1970	3,488,726	2.57	-	2.81	-	-
368	Line Transformers	1971	2,347,764	2.57	60,371	2.81	66,031	5,660
368	Line Transformers	1972	2,670,306	2.57	68,665	2.81	75,102	6,437
368	Line Transformers	1973	3,555,524	2.57	91,428	2.81	99,999	8,571
368	Line Transformers	1974	3,843,051	2.57	98,821	2.81	108,086	9,264
368	Line Transformers	1975	2,956,467	2.57	76,023	2.81	83,151	7,127
368	Line Transformers	1976	3,703,523	2.57	95,233	2.81	104,162	8,928
368	Line Transformers	1977	5,365,956	2.57	137,982	2.81	150,918	12,936
368	Line Transformers	1978	6,161,819	2.57	158,447	2.81	173,301	14,854
368	Line Transformers	1979	6,730,639	2.57	173,074	2.81	189,299	16,226
368	Line Transformers	1980	6,315,731	2.57	162,405	2.81	177,630	15,225

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368	Line Transformers	1981	7,412,937	2.57	190,618	2.81	208,489	17,870
368	Line Transformers	1982	5,903,671	2.57	151,809	2.81	166,041	14,232
368	Line Transformers	1983	6,727,276	2.57	172,987	2.81	189,205	16,218
368	Line Transformers	1984	9,089,135	2.57	233,721	2.81	255,632	21,911
368	Line Transformers	1985	12,782,759	2.57	328,700	2.81	359,515	30,816
368	Line Transformers	1986	10,234,599	2.57	263,175	2.81	287,848	24,673
368	Line Transformers	1987	11,810,391	2.57	303,696	2.81	332,167	28,471
368	Line Transformers	1988	9,313,585	2.57	239,492	2.81	261,945	22,452
368	Line Transformers	1989	11,943,572	2.57	307,120	2.81	335,913	28,793
368	Line Transformers	1990	3,373,724	2.57	86,753	2.81	94,886	8,133
368	Line Transformers	1991	5,823,985	2.57	149,760	2.81	163,800	14,040
368	Line Transformers	1992	7,608,321	2.57	195,643	2.81	213,984	18,341
368	Line Transformers	1993	4,876,007	2.57	125,383	2.81	137,138	11,755
368	Line Transformers	1994	7,198,943	2.57	185,116	2.81	202,470	17,355
368	Line Transformers	1995	11,626,429	2.57	298,965	2.81	326,993	28,028
368	Line Transformers	1996	12,737,617	2.57	327,539	2.81	358,245	30,707
368	Line Transformers	1997	12,268,384	2.57	315,473	2.81	345,048	29,576
368	Line Transformers	1998	12,583,089	2.57	323,565	2.81	353,899	30,334
368	Line Transformers	1999	12,509,178	2.57	321,665	2.81	351,821	30,156
368	Line Transformers	2000	13,677,879	2.57	351,717	2.81	384,690	32,973
368	Line Transformers	2001	3,641,920	2.57	93,649	2.81	102,429	8,780
368	Line Transformers	2002	8,996,026	2.57	231,327	2.81	253,013	21,687
	Total		278,641,875		6,320,320		6,912,850	592,530
368	Line Capacitors	1961	14,655	4.00	-	4.00	-	-
368	Line Capacitors	1962	26,598	4.00	-	4.00	-	-
368	Line Capacitors	1963	25,429	4.00	-	4.00	-	-
368	Line Capacitors	1964	23,393	4.00	-	4.00	-	-
368	Line Capacitors	1965	13,505	4.00	-	4.00	-	-
368	Line Capacitors	1966	5,536	4.00	-	4.00	-	-
368	Line Capacitors	1967	27,979	4.00	-	4.00	-	-
368	Line Capacitors	1968	24,355	4.00	-	4.00	-	-
368	Line Capacitors	1969	10,305	4.00	-	4.00	-	-
368	Line Capacitors	1970	14,347	4.00	-	4.00	-	-
368	Line Capacitors	1971	17,999	4.00	-	4.00	-	-
368	Line Capacitors	1972	39,515	4.00	-	4.00	-	-
368	Line Capacitors	1973	34,674	4.00	-	4.00	-	-

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368	Line Capacitors	1974	40,957	4.00	-	4.00	-	-
368	Line Capacitors	1975	67,223	4.00	-	4.00	-	-
368	Line Capacitors	1976	96,561	4.00	-	4.00	-	-
368	Line Capacitors	1977	222,683	4.00	2,813	4.00	2,813	-
368	Line Capacitors	1978	411,836	4.00	16,473	4.00	16,473	-
368	Line Capacitors	1979	185,916	4.00	7,437	4.00	7,437	-
368	Line Capacitors	1980	179,485	4.00	7,179	4.00	7,179	-
368	Line Capacitors	1981	347,433	4.00	13,897	4.00	13,897	-
368	Line Capacitors	1982	302,902	4.00	12,116	4.00	12,116	-
368	Line Capacitors	1983	705,478	4.00	28,219	4.00	28,219	-
368	Line Capacitors	1984	968,119	4.00	38,725	4.00	38,725	-
368	Line Capacitors	1985	764,626	4.00	30,585	4.00	30,585	-
368	Line Capacitors	1986	1,022,687	4.00	40,907	4.00	40,907	-
368	Line Capacitors	1987	476,342	4.00	19,054	4.00	19,054	-
368	Line Capacitors	1988	296,447	4.00	11,858	4.00	11,858	-
368	Line Capacitors	1989	488,981	4.00	19,559	4.00	19,559	-
368	Line Capacitors	1990	618,032	4.00	24,721	4.00	24,721	-
368	Line Capacitors	1991	487,454	4.00	19,498	4.00	19,498	-
368	Line Capacitors	1992	566,722	4.00	22,669	4.00	22,669	-
368	Line Capacitors	1993	304,502	4.00	12,180	4.00	12,180	-
368	Line Capacitors	1994	155,813	4.00	6,233	4.00	6,233	-
368	Line Capacitors	1995	2,613,660	4.00	104,546	4.00	104,546	-
368	Line Capacitors	1996	585,095	4.00	23,404	4.00	23,404	-
368	Line Capacitors	1997	1,359,479	4.00	54,379	4.00	54,379	-
368	Line Capacitors	1998	1,106,621	4.00	44,265	4.00	44,265	-
368	Line Capacitors	1999	519,524	4.00	20,781	4.00	20,781	-
368	Line Capacitors	2000	786,424	4.00	31,457	4.00	31,457	-
368	Line Capacitors	2001	362,241	4.00	14,490	4.00	14,490	-
368	Line Capacitors	2002	455,912	4.00	18,236	4.00	18,236	-
	Total		16,777,443		645,682		645,682	-
370	Meters	1907	38	4.00	2	5.00	2	0
370	Meters	1910	24	4.00	1	5.00	1	0
370	Meters	1913	97	4.00	4	5.00	5	1
370	Meters	1915	24	4.00	1	5.00	1	0
370	Meters	1917	610	4.00	24	5.00	30	6
370	Meters	1918	170	4.00	7	5.00	8	2

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				Annual Rate	Annual Accrual	Annual Rate	Annual Accrual	
370	Meters	1919	60	4.00	2	5.00	3	1
370	Meters	1920	27	4.00	1	5.00	1	0
370	Meters	1921	76	4.00	3	5.00	4	1
370	Meters	1922	1,130	4.00	45	5.00	56	11
370	Meters	1923	404	4.00	16	5.00	20	4
370	Meters	1924	674	4.00	27	5.00	34	7
370	Meters	1925	209	4.00	8	5.00	10	2
370	Meters	1926	632	4.00	25	5.00	32	6
370	Meters	1927	1,438	4.00	58	5.00	72	14
370	Meters	1928	954	4.00	38	5.00	48	10
370	Meters	1929	191	4.00	8	5.00	10	2
370	Meters	1930	12,692	4.00	508	5.00	635	127
370	Meters	1931	131	4.00	5	5.00	7	1
370	Meters	1932	187	4.00	7	5.00	9	2
370	Meters	1933	142	4.00	6	5.00	7	1
370	Meters	1934	340	4.00	14	5.00	17	3
370	Meters	1935	1,065	4.00	43	5.00	53	11
370	Meters	1936	1,085	4.00	43	5.00	54	11
370	Meters	1937	453	4.00	18	5.00	23	5
370	Meters	1938	940	4.00	38	5.00	47	9
370	Meters	1939	3,842	4.00	154	5.00	192	38
370	Meters	1940	4,371	4.00	175	5.00	219	44
370	Meters	1941	3,527	4.00	141	5.00	176	35
370	Meters	1942	1,484	4.00	59	5.00	74	15
370	Meters	1943	695	4.00	28	5.00	35	7
370	Meters	1944	2,515	4.00	101	5.00	126	25
370	Meters	1945	2,490	4.00	100	5.00	124	25
370	Meters	1946	4,764	4.00	191	5.00	238	48
370	Meters	1947	10,230	4.00	409	5.00	512	102
370	Meters	1948	9,416	4.00	377	5.00	471	94
370	Meters	1949	10,362	4.00	414	5.00	518	104
370	Meters	1950	19,704	4.00	788	5.00	985	197
370	Meters	1951	22,039	4.00	882	5.00	1,102	220
370	Meters	1952	16,912	4.00	676	5.00	846	169
370	Meters	1953	26,362	4.00	1,054	5.00	1,318	264
370	Meters	1954	24,351	4.00	974	5.00	1,218	244
370	Meters	1955	45,563	4.00	1,823	5.00	2,278	456

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370	Meters	1956	39,089	4.00	1,564	5.00	1,954	391
370	Meters	1957	42,087	4.00	1,683	5.00	2,104	421
370	Meters	1958	55,071	4.00	2,203	5.00	2,754	551
370	Meters	1959	57,627	4.00	2,305	5.00	2,881	576
370	Meters	1960	95,678	4.00	3,827	5.00	4,784	957
370	Meters	1961	77,424	4.00	3,097	5.00	3,871	774
370	Meters	1962	72,862	4.00	2,914	5.00	3,643	729
370	Meters	1963	80,145	4.00	3,206	5.00	4,007	801
370	Meters	1964	71,776	4.00	2,871	5.00	3,589	718
370	Meters	1965	97,098	4.00	3,884	5.00	4,855	971
370	Meters	1966	115,140	4.00	4,606	5.00	5,757	1,151
370	Meters	1967	131,503	4.00	5,260	5.00	6,575	1,315
370	Meters	1968	182,942	4.00	7,318	5.00	9,147	1,829
370	Meters	1969	183,355	4.00	7,334	5.00	9,168	1,834
370	Meters	1970	263,254	4.00	10,530	5.00	13,163	2,633
370	Meters	1971	401,800	4.00	16,072	5.00	20,090	4,018
370	Meters	1972	490,916	4.00	19,637	5.00	24,546	4,909
370	Meters	1973	500,320	4.00	20,013	5.00	25,016	5,003
370	Meters	1974	686,923	4.00	27,477	5.00	34,346	6,869
370	Meters	1975	482,877	4.00	19,315	5.00	24,144	4,829
370	Meters	1976	696,702	4.00	27,868	5.00	34,835	6,967
370	Meters	1977	1,120,142	4.00	44,806	5.00	56,007	11,201
370	Meters	1978	1,359,984	4.00	54,399	5.00	67,999	13,600
370	Meters	1979	1,816,297	4.00	72,652	5.00	90,815	18,163
370	Meters	1980	2,058,472	4.00	82,339	5.00	102,924	20,585
370	Meters	1981	801,970	4.00	32,079	5.00	40,099	8,020
370	Meters	1982	1,102,178	4.00	44,087	5.00	55,109	11,022
370	Meters	1983	1,704,417	4.00	68,177	5.00	85,221	17,044
370	Meters	1984	1,912,590	4.00	76,504	5.00	95,629	19,126
370	Meters	1985	2,514,120	4.00	100,565	5.00	125,706	25,141
370	Meters	1986	2,617,963	4.00	104,719	5.00	130,898	26,180
370	Meters	1987	2,556,207	4.00	102,248	5.00	127,810	25,562
370	Meters	1988	2,325,392	4.00	93,016	5.00	116,270	23,254
370	Meters	1989	2,459,123	4.00	98,365	5.00	122,956	24,591
370	Meters	1990	2,643,070	4.00	105,723	5.00	132,153	26,431
370	Meters	1991	3,700,086	4.00	148,003	5.00	185,004	37,001
370	Meters	1992	3,308,759	4.00	132,350	5.00	165,438	33,088

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370	Meters	1993	5,228,072	4.00	209,123	5.00	261,404	52,281
370	Meters	1994	4,858,742	4.00	194,350	5.00	242,937	48,587
370	Meters	1995	4,286,655	4.00	171,466	5.00	214,333	42,867
370	Meters	1996	4,872,530	4.00	194,901	5.00	243,626	48,725
370	Meters	1997	8,500,830	4.00	340,033	5.00	425,042	85,008
370	Meters	1998	6,819,165	4.00	272,767	5.00	340,958	68,192
370	Meters	1999	7,745,185	4.00	309,807	5.00	387,259	77,452
370	Meters	2000	13,390,802	4.00	535,632	5.00	669,540	133,908
370	Meters	2001	9,387,113	4.00	375,485	5.00	469,356	93,871
370	Meters	2002	1,540,835	4.00	61,633	5.00	77,042	15,408
	Total		105,687,711		4,227,508		5,284,386	1,056,877
	Total Electric Distribution Plant		401,107,030		11,193,510		12,842,917	1,649,407
	Total Electric Utility		531,162,972		22,301,843		25,207,170	2,905,327

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Schedule B

Gas Utility

FERC Acct	Account Description		Plant Balance 1/1/2003	Present Annual Rate	Present Annual Accrual	Proposed Annual Rate	Proposed Annual Accrual	Proposed Less Present Accrual
Intangible Plant								
303	Computer Software - 5 Year		1,331,536	20.00	266,307	20.00	266,307	-
	Total		1,331,536		266,307		266,307	-
General Plant								
391	Office Furniture and Equipment	1981	314	5.28	17	5.28	17	-
391	Office Furniture and Equipment	1989	1,354	5.28	71	5.28	71	-
391	Office Furniture and Equipment	1993	2,662	5.28	141	5.28	141	-
391	Office Furniture and Equipment	1998	24,147	5.28	1,274	5.28	1,274	-
391	Office Furniture and Equipment	1999	2,596	5.28	137	5.28	137	-
391	Office Furniture and Equipment	2000	1,408	5.28	74	5.28	74	-
391	Office Furniture and Equipment	2002	87	5.28	5	5.28	5	-
	Total		32,569		1,719		1,719	-
391	Network Equipment	1997	158,425	25.00	-	25.00	-	-
391	Network Equipment	1998	733,108	25.00	-	25.00	-	-
391	Network Equipment	1999	819,797	25.00	126,723	25.00	126,723	-
391	Network Equipment	2000	374,696	25.00	93,674	25.00	93,674	-
391	Network Equipment	2001	21,445	25.00	5,361	25.00	5,361	-
391	Network Equipment	2002	1,934	25.00	484	25.00	484	-
	Total		2,109,405		226,242		226,242	-
392	Automobiles		-		-		-	-
392	Light Trucks	1985	11,236	9.00	1,011	22.50	2,528	1,517
392	Light Trucks	1988	14,190	9.00	1,277	22.50	3,193	1,916
392	Light Trucks	1989	30,810	9.00	2,773	22.50	6,932	4,159
392	Light Trucks	1990	20,337	9.00	1,830	22.50	4,576	2,745
392	Light Trucks	1991	5,045	9.00	454	22.50	1,135	681
392	Light Trucks	1993	24,833	9.00	2,235	22.50	5,587	3,352
	Total		106,451		9,580		23,951	14,371
392	Trailers	1977	6,116	9.00	-	22.50	-	-
392	Trailers	1978	5,340	9.00	-	22.50	-	-

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Accruals by Vintage

Schedule B

Gas Utility

FERC Acct	Account Description		Plant Balance 1/1/2003	Present		Proposed		Proposed Less Present Accrual
				Annual Rate	Annual Accrual	Annual Rate	Annual Accrual	
392	Trailers	1979	872	9.00	-	22.50	-	-
392	Trailers	1980	434	9.00	-	22.50	-	-
392	Trailers	1982	6,840	9.00	-	22.50	-	-
392	Trailers	1984	20,990	9.00	-	22.50	-	-
392	Trailers	1985	9,233	9.00	-	22.50	-	-
392	Trailers	1986	9,391	9.00	-	22.50	-	-
392	Trailers	1987	12,969	9.00	1,167	22.50	2,918	1,751
392	Trailers	1988	47,882	9.00	-	22.50	10,773	10,773
392	Trailers	1989	35,606	9.00	3,205	22.50	8,011	4,807
392	Trailers	1990	37,151	9.00	865	22.50	865	-
	Total		192,824		5,237		22,568	17,331
392	Heavy Trucks	1986	102,331	7.92	8,101	19.00	13,352	5,251
392	Heavy Trucks	1987	210,731	7.92	-	19.00	-	-
392	Heavy Trucks	1988	79,931	7.92	-	19.00	-	-
392	Heavy Trucks	1990	652,503	7.92	51,656	19.00	123,976	72,319
392	Heavy Trucks	1991	57,073	7.92	2,024	19.00	2,024	-
	Total		1,102,569		61,782		139,352	77,570
394	Tools, Shop, and Garage Equipment	1972	69,442	6.67	505	6.67	505	-
394	Tools, Shop, and Garage Equipment	1973	9,676	6.67	242	6.67	242	-
394	Tools, Shop, and Garage Equipment	1974	12,541	6.67	274	6.67	274	-
394	Tools, Shop, and Garage Equipment	1975	57,444	6.67	2,772	6.67	2,772	-
394	Tools, Shop, and Garage Equipment	1976	38,594	6.67	2,573	6.67	2,573	-
394	Tools, Shop, and Garage Equipment	1977	73,402	6.67	4,893	6.67	4,893	-
394	Tools, Shop, and Garage Equipment	1978	126,579	6.67	8,439	6.67	8,439	-
394	Tools, Shop, and Garage Equipment	1979	239,704	6.67	15,980	6.67	15,980	-
394	Tools, Shop, and Garage Equipment	1980	107,157	6.67	7,144	6.67	7,144	-
394	Tools, Shop, and Garage Equipment	1981	66,761	6.67	4,451	6.67	4,451	-
394	Tools, Shop, and Garage Equipment	1982	215,676	6.67	14,378	6.67	14,378	-
394	Tools, Shop, and Garage Equipment	1983	86,651	6.67	5,777	6.67	5,777	-
394	Tools, Shop, and Garage Equipment	1984	89,175	6.67	5,945	6.67	5,945	-
394	Tools, Shop, and Garage Equipment	1985	150,678	6.67	10,045	6.67	10,045	-
394	Tools, Shop, and Garage Equipment	1986	81,823	6.67	5,455	6.67	5,455	-
394	Tools, Shop, and Garage Equipment	1987	87,576	6.67	5,838	6.67	5,838	-
394	Tools, Shop, and Garage Equipment	1988	69,663	6.67	4,644	6.67	4,644	-
394	Tools, Shop, and Garage Equipment	1989	130,429	6.67	8,695	6.67	8,695	-

NORTHERN STATES POWER COMPANY
Comparison of Present and Proposed Accruals by Vintage

Schedule B

Gas Utility

FERC Acct	Account Description		Plant Balance 1/1/2003	Present Annual Rate	Present Annual Accrual	Proposed Annual Rate	Proposed Annual Accrual	Proposed Less Present Accrual
394	Tools, Shop, and Garage Equipment	1990	325,821	6.67	21,721	6.67	21,721	-
394	Tools, Shop, and Garage Equipment	1991	188,184	6.67	12,546	6.67	12,546	-
394	Tools, Shop, and Garage Equipment	1992	167,566	6.67	11,171	6.67	11,171	-
394	Tools, Shop, and Garage Equipment	1993	542,459	6.67	36,164	6.67	36,164	-
394	Tools, Shop, and Garage Equipment	1994	372,742	6.67	24,849	6.67	24,849	-
394	Tools, Shop, and Garage Equipment	1995	413,970	6.67	27,598	6.67	27,598	-
394	Tools, Shop, and Garage Equipment	1996	307,274	6.67	20,485	6.67	20,485	-
394	Tools, Shop, and Garage Equipment	1997	467,726	6.67	31,182	6.67	31,182	-
394	Tools, Shop, and Garage Equipment	1998	302,442	6.67	20,163	6.67	20,163	-
394	Tools, Shop, and Garage Equipment	1999	205,984	6.67	13,732	6.67	13,732	-
394	Tools, Shop, and Garage Equipment	2000	465,129	6.67	31,009	6.67	31,009	-
394	Tools, Shop, and Garage Equipment	2001	340,849	6.67	22,723	6.67	22,723	-
394	Tools, Shop, and Garage Equipment	2002	63,104	6.67	4,207	6.67	4,207	-
	Total		5,876,221		385,601		385,601	-
395	Laboratory Equipment	1970	309	10.00	31	10.00	31	-
395	Laboratory Equipment	1972	405	10.00	41	10.00	41	-
395	Laboratory Equipment	1973	3,263	10.00	326	10.00	326	-
395	Laboratory Equipment	1975	378	10.00	38	10.00	38	-
395	Laboratory Equipment	1977	865	10.00	87	10.00	87	-
395	Laboratory Equipment	1979	672	10.00	67	10.00	67	-
395	Laboratory Equipment	1980	4,820	10.00	482	10.00	482	-
395	Laboratory Equipment	1981	210	10.00	21	10.00	21	-
395	Laboratory Equipment	1982	25,969	10.00	2,597	10.00	2,597	-
395	Laboratory Equipment	1985	1,105	10.00	111	10.00	111	-
395	Laboratory Equipment	1987	1,867	10.00	187	10.00	187	-
395	Laboratory Equipment	1989	8,634	10.00	863	10.00	863	-
395	Laboratory Equipment	1991	1,098	10.00	110	10.00	110	-
395	Laboratory Equipment	1992	797	10.00	80	10.00	80	-
395	Laboratory Equipment	1994	2,514	10.00	251	10.00	251	-
395	Laboratory Equipment	1995	2,517	10.00	252	10.00	252	-
	Total		55,423		5,542		5,542	-
396	Power Operated Equipment	1986	129,461	9.00	-	22.50	-	-
396	Power Operated Equipment	1987	81,999	9.00	-	22.50	-	-
396	Power Operated Equipment	1988	70,455	9.00	-	22.50	-	-
396	Power Operated Equipment	1989	175,633	9.00	-	22.50	-	-

SCHEDULE F
PLANT IN SERVICE

NORTHERN STATES POWER COMPANY **SCHEDULE F**
1998 PLANT IN SERVICE

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
ELECTRIC								
303	411014	INTG MISC COMPUTR SOFTWARE	3,123,766					3,123,766
368	411631	DISTRIBUTION LINE TRANSFORMERS	248,191,674	13,831,209	-2,727,805		401,792	259,696,869
368	411633	DISTRIBUTION LINE CAPACITORS	14,313,251	1,123,717	-261,760			15,175,209
370	411651	DISTRIBUTION METERS	97,197,014	7,111,526	-11,311,277		345,090	93,342,352
391	411925	GENERAL OFFICE FURN & EQUIP	4,516,456	111,639				4,628,095
391.1	411926	GENERAL INFO SYS COMPUTERS	20,577,553	4,360,993	-92,304			24,846,241
392	411928	GENERAL TRANSP EQ GRP 2-3	5,934,465					5,934,465
392	411929	GENERAL TRANSP EQ TRAILERS	2,342,234					2,342,234
392	411931	GENERAL TRANSP EQ GRP 4-8	23,463,209					23,463,209
393	411930	GENERAL STORES EQUIPMENT	1,988,358	7,460				1,995,818
394	411944	GENERAL TOOLS & SHOP EQUIPMENT	24,250,978	1,919,351				26,170,329
395	411950	GENERAL LABORATORY EQUIPMENT	7,197,619	601,436				7,799,055
396	411963	GENERAL POWER OPERATED EQUIP	4,885,398	3,419	-75,609			4,813,209
397	411970	GENERAL COMMUNICATIONS EQUIP	10,532,275	74,887	-9,039		-1,054,794	9,543,330
397	411972	GENERAL COMMUNICATIONS EQUIP	1,349,869	78,332	-60,000			1,368,201
397	411976	GENERAL COMMUNICATE EQUIP-EMS	10,436,522	623,796			5,543,022	16,603,340
398	411980	GENERAL MISCELLANEOUS EQUIP	477,163	16,221				493,383
	TOTAL		480,777,805	29,863,985	-14,537,794	0	5,235,111	501,339,106
GAS								
303	421014	INTG MISC COMPUTR SOFTWARE	0					0
381	421615	DISTRIBUTION METERS	59,893,952	7,170,209	-1,517,478		14,242	65,560,924
381	421617	DISTRIBUTION METERS-TELEMETER	448,306	152,840				601,146
383	421619	DISTRIBUTION HOUSE REGULATORS	11,368,758		-280,396	-19,760		11,068,603
391	421921	GENERAL OFFICE FURN & EQUIP	4,331	24,147				28,478
391.1	421926	GENERAL INFO SYS COMPUTERS	1,535,824	733,108				2,268,932
392	421928	GENERAL TRANSP EQ GRP 2-3	1,427,454					1,427,454
392	421929	GENERAL TRANSP EQ TRAILERS	267,350					267,350
392	421931	GENERAL TRANSP EQ GRP 4-8	2,087,104					2,087,104
394	421942	GENERAL TOOLS & SHOP EQUIPMENT	4,558,487	302,442				4,860,929
395	421950	GENERAL LABORATORY EQUIPMENT	55,423					55,423
396	421963	GENERAL POWER OPERATED EQUIP	1,519,077					1,519,077
397	421970	GENERAL COMMUNICATIONS EQUIP	1,974,192	106,112	-11,442			2,068,862
397	421972	GENERAL COMMUNICATIONS EQUIP	29,473	45,532				75,004
398	421980	GENERAL MISCELLANEOUS EQUIP	70,097					70,097
	TOTAL		85,239,826	8,534,389	-1,809,316	-19,760	14,242	91,959,381
COMMON								
303	481014	INTG MISC COMPUTR SOFTWARE	80,619,403	10,554,395	-6,311,278			84,862,519
391	481921	GENERAL OFFICE FURN & EQUIP	20,222,017	1,536,941				21,758,958
391.1	481922	GENERAL INFO SYS COMPUTERS	45,225,647	4,048,515				49,274,162
391.1	481920	GENERAL INFO SYS-MAIN FRAME	28,831,850	937,770	-260,729			29,508,892
392	481924	GENERAL TRANSP EQ GRP 2-3	262,394					262,394
392	481926	GENERAL TRANSP EQ GRP 4-8	35,125					35,125
393	481927	GENERAL STORES EQUIPMENT	942,196					942,196
394	481929	GENERAL TOOLS & SHOP EQUIPMENT	4,174,341	88,647				4,262,988
395	481935	GENERAL LABORATORY EQUIPMENT	35,983					35,983
396	481941	GENERAL POWER OPERATED EQUIP	11,414					11,414
397	481943	GENERAL COMMUNICATIONS EQUIP	15,552,290	187,206	-57,550			15,681,946
397	481950	GENERAL COMMUNICATIONS EQUIP	7,084,516	2,642,667	-1,629,911			8,097,272
398	481991	GENERAL MISCELLANEOUS EQUIP	849,837	65,142				914,979
	TOTAL		203,847,013	20,061,283	-8,259,468	0	0	215,648,829
		VINTAGE GROUP TOTALS	769,864,644	58,459,657	-24,606,578	-19,760	5,249,352	808,947,315

NORTHERN STATES POWER COMPANY
1999 PLANT IN SERVICE

SCHEDULE F

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
ELECTRIC								
303	411014	INTG MISC COMPUTR SOFTWARE	3,123,766	2,565,309				5,689,075
368	411631	DISTRIBUTION LINE TRANSFORMERS	259,696,869	13,794,179	-2,909,021		290,921	270,872,948
368	411633	DISTRIBUTION LINE CAPACITORS	15,175,209	519,524	-209,316			15,485,417
370	411651	DISTRIBUTION METERS	93,342,352	8,256,099	-7,014,791	425	184,707	94,768,793
391	411925	GENERAL OFFICE FURN & EQUIP	4,628,095	260,029	-158,432			4,729,693
391.1	411926	GENERAL INFO SYS COMPUTERS	24,846,241	3,713,553	-8,457,771			20,102,024
392	411928	GENERAL TRANSP EQ GRP 2-3	5,934,465		-5,509,747			424,718
392	411929	GENERAL TRANSP EQ TRAILERS	2,342,234		-1,171,529			1,170,705
392	411931	GENERAL TRANSP EQ GRP 4-8	23,463,209		-11,574,988			11,888,221
393	411930	GENERAL STORES EQUIPMENT	1,995,818					1,995,818
394	411944	GENERAL TOOLS & SHOP EQUIPMENT	26,170,329	2,132,434				28,302,763
395	411950	GENERAL LABORATORY EQUIPMENT	7,799,055	372,410				8,171,465
396	411963	GENERAL POWER OPERATED EQUIP	4,813,209		-3,051,840			1,761,369
397	411970	GENERAL COMMUNICATIONS EQUIP	9,543,330	295,527	-320			9,838,538
397	411972	GENERAL COMMUNICATIONS EQUIP	1,368,201	114,715				1,482,916
397	411976	GENERAL COMMUNICATE EQUIP-EMS	16,603,340	1,675,821				18,279,162
398	411980	GENERAL MISCELLANEOUS EQUIP	493,383	3,571				496,954
	TOTAL		501,339,106	33,703,173	-40,057,754	425	475,628	495,460,578
GAS								
303	421014	INTG MISC COMPUTR SOFTWARE	0	1,375,733				1,375,733
381	421615	DISTRIBUTION METERS	65,560,924	5,598,506	-1,844,189	-425	56,137	69,370,952
381	421617	DISTRIBUTION METERS-TELEMETER	601,146					601,146
383	421619	DISTRIBUTION HOUSE REGULATORS	11,068,603					11,068,603
391	421921	GENERAL OFFICE FURN & EQUIP	28,478	2,596				31,074
391.1	421926	GENERAL INFO SYS COMPUTERS	2,268,932	819,797	-1,166,273			1,922,457
392	421928	GENERAL TRANSP EQ GRP 2-3	1,427,454		-1,345,836			81,618
392	421929	GENERAL TRANSP EQ TRAILERS	267,350		-74,525			192,824
392	421931	GENERAL TRANSP EQ GRP 4-8	2,087,104		-984,534			1,102,569
394	421942	GENERAL TOOLS & SHOP EQUIPMENT	4,860,929	205,984				5,066,913
395	421950	GENERAL LABORATORY EQUIPMENT	55,423					55,423
396	421963	GENERAL POWER OPERATED EQUIP	1,519,077		-851,683			667,393
397	421970	GENERAL COMMUNICATIONS EQUIP	2,068,862	56,063				2,124,925
397	421972	GENERAL COMMUNICATIONS EQUIP	75,004	5,338				80,343
398	421980	GENERAL MISCELLANEOUS EQUIP	70,097	17,270				87,367
	TOTAL		91,959,381	8,081,287	-6,267,041	-425	56,137	93,829,339
COMMON								
303	481014	INTG MISC COMPUTR SOFTWARE	84,862,519	22,467,191				107,329,711
391	481921	GENERAL OFFICE FURN & EQUIP	21,758,958	1,490,065	-1,075,520			22,173,503
391.1	481922	GENERAL INFO SYS COMPUTERS	49,274,162	6,545,745	-16,668,614			39,151,294
391.1	481920	GENERAL INFO SYS-MAIN FRAME	29,508,892	831,398				30,340,289
392	481924	GENERAL TRANSP EQ GRP 2-3	262,394		-154,383			108,012
392	481926	GENERAL TRANSP EQ GRP 4-8	35,125					35,125
393	481927	GENERAL STORES EQUIPMENT	942,196					942,196
394	481929	GENERAL TOOLS & SHOP EQUIPMENT	4,262,988	107,902				4,370,890
395	481935	GENERAL LABORATORY EQUIPMENT	35,983					35,983
396	481941	GENERAL POWER OPERATED EQUIP	11,414		-6,445			4,968
397	481943	GENERAL COMMUNICATIONS EQUIP	15,681,946	231,088				15,913,033
397	481950	GENERAL COMMUNICATIONS EQUIP	8,097,272	97,882				8,195,153
398	481991	GENERAL MISCELLANEOUS EQUIP	914,979	43,681				958,660
	TOTAL		215,648,829	31,814,951	-17,904,962	0	0	229,558,818
		VINTAGE GROUP TOTALS	808,947,315	73,599,411	-64,229,756	0	531,765	818,848,735

NORTHERN STATES POWER COMPANY
2000 PLANT IN SERVICE

SCHEDULE F

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
ELECTRIC								
303	411014	INTG MISC COMPUTR SOFTWARE	5,689,075	23,835	-547,662			5,165,248
368	411631	DISTRIBUTION LINE TRANSFORMERS	270,872,948	14,883,786	-2,992,619			282,764,115
368	411633	DISTRIBUTION LINE CAPACITORS	15,485,417	786,424	-152,101			16,119,740
370	411651	DISTRIBUTION METERS	94,768,793	11,145,856	-10,592,787	1,823,047	590,850	97,735,758
391	411925	GENERAL OFFICE FURN & EQUIP	4,729,693	308,305				5,037,997
391.1	411926	GENERAL INFO SYS COMPUTERS	20,102,024	3,349,621				23,451,645
392	411928	GENERAL TRANSP EQ GRP 2-3	424,718					424,718
392	411929	GENERAL TRANSP EQ TRAILERS	1,170,705					1,170,705
392	411931	GENERAL TRANSP EQ GRP 4-8	11,888,221		-51,945			11,836,276
393	411930	GENERAL STORES EQUIPMENT	1,995,818					1,995,818
394	411944	GENERAL TOOLS & SHOP EQUIPMENT	28,302,763	2,249,623				30,552,387
395	411950	GENERAL LABORATORY EQUIPMENT	8,171,465	664,014				8,835,479
396	411963	GENERAL POWER OPERATED EQUIP	1,761,369	3,333				1,764,702
397	411970	GENERAL COMMUNICATIONS EQUIP	9,838,538	724,757	-2,597			10,560,698
397	411972	GENERAL COMMUNICATIONS EQUIP	1,482,916	2,901,688		-1,818,054		2,566,550
397	411976	GENERAL COMMUNICATE EQUIP-EMS	18,279,162	119,121				18,398,283
398	411980	GENERAL MISCELLANEOUS EQUIP	496,954	66,307				563,261
	TOTAL		495,460,578	37,226,670	-14,339,711	4,993	590,850	518,943,380
GAS								
303	421014	INTG MISC COMPUTR SOFTWARE	1,375,733	565,562				1,941,295
381	421615	DISTRIBUTION METERS	69,370,952	6,382,787	-2,353,706	-4,993	36,212	73,431,252
381	421617	DISTRIBUTION METERS-TELEMETER	601,146	38,103				639,249
383	421619	DISTRIBUTION HOUSE REGULATORS	11,068,603		-394,421			10,674,182
391	421921	GENERAL OFFICE FURN & EQUIP	31,074	1,408				32,482
391.1	421926	GENERAL INFO SYS COMPUTERS	1,922,457	374,696				2,297,153
392	421928	GENERAL TRANSP EQ GRP 2-3	81,618					81,618
392	421929	GENERAL TRANSP EQ TRAILERS	192,824					192,824
392	421931	GENERAL TRANSP EQ GRP 4-8	1,102,569					1,102,569
394	421942	GENERAL TOOLS & SHOP EQUIPMENT	5,066,913	458,597				5,525,510
395	421950	GENERAL LABORATORY EQUIPMENT	55,423					55,423
396	421963	GENERAL POWER OPERATED EQUIP	667,393					667,393
397	421970	GENERAL COMMUNICATIONS EQUIP	2,124,925	126,287				2,251,212
397	421972	GENERAL COMMUNICATIONS EQUIP	80,343	2,147				82,489
398	421980	GENERAL MISCELLANEOUS EQUIP	87,367	15,235				102,602
	TOTAL		93,829,339	7,964,821	-2,748,127	-4,993	36,212	99,077,253
COMMON								
303	481014	INTG MISC COMPUTR SOFTWARE	107,329,711	5,285,516				112,615,226
391	481921	GENERAL OFFICE FURN & EQUIP	22,173,503	2,973,989				25,147,492
391.1	481922	GENERAL INFO SYS COMPUTERS	39,151,294	3,370,710				42,522,004
391.1	481920	GENERAL INFO SYS-MAIN FRAME	30,340,289	9,160				30,349,450
392	481924	GENERAL TRANSP EQ GRP 2-3	108,012					108,012
392	481926	GENERAL TRANSP EQ GRP 4-8	35,125					35,125
393	481927	GENERAL STORES EQUIPMENT	942,196					942,196
394	481929	GENERAL TOOLS & SHOP EQUIPMENT	4,370,890	63,472				4,434,362
395	481935	GENERAL LABORATORY EQUIPMENT	35,983					35,983
396	481941	GENERAL POWER OPERATED EQUIP	4,968					4,968
397	481943	GENERAL COMMUNICATIONS EQUIP	15,913,033	1,042,960				16,955,993
397	481950	GENERAL COMMUNICATIONS EQUIP	8,195,153	2,391,626				10,586,779
398	481991	GENERAL MISCELLANEOUS EQUIP	958,660	2,970				961,630
	TOTAL		229,558,818	15,140,403	0	0	0	244,699,221
		VINTAGE GROUP TOTALS	818,848,735	60,331,895	-17,087,838	0	627,062	862,719,854

NORTHERN STATES POWER COMPANY
2001 PLANT IN SERVICE

SCHEDULE F

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
ELECTRIC								
303	10303004	INTG MISC COMPUTR SOFTWARE	5,165,248					5,165,248
368	10368000	DISTRIBUTION LINE TRANSFORMERS	282,764,115	9,588,339	-17,667,060			274,685,394
368	10368010	DISTRIBUTION LINE CAPACITORS	16,119,740	362,241	-115,175			16,366,806
370	10370000	DISTRIBUTION METERS	97,735,758	10,770,606	-4,473,775	1,027,529		105,060,119
391	10391000	GENERAL OFFICE FURN & EQUIP	5,037,997	742,286		100,922		5,881,205
391.1	10391004	GENERAL INFO SYS COMPUTERS	23,451,645	3,634,116		11,534		27,097,294
392	10392020	GENERAL TRANSP EQ GRP 2-3	424,718					424,718
392	10392030	GENERAL TRANSP EQ TRAILERS	1,170,705					1,170,705
392	10392040	GENERAL TRANSP EQ GRP 4-8	11,836,276					11,836,276
393	10393000	GENERAL STORES EQUIPMENT	1,995,818					1,995,818
394	10394000	GENERAL TOOLS & SHOP EQUIPMENT	30,552,387	1,069,326				31,621,713
395	10395000	GENERAL LABORATORY EQUIPMENT	8,835,479	848,316				9,683,795
396	10396000	GENERAL POWER OPERATED EQUIP	1,764,702					1,764,702
397	10397000	GENERAL COMMUNICATIONS EQUIP	10,560,698	200,184	-1,725			10,759,157
397	10397010	GENERAL COMMUNICATIONS EQUIP	2,566,550	51,714		-1,020,167		1,598,097
397	10397030	GENERAL COMMUNICATE EQUIP-EMS	18,398,283					18,398,283
398	10398000	GENERAL MISCELLANEOUS EQUIP	563,261	171,983				735,244
	TOTAL		518,943,380	27,439,110	-22,257,735	119,819	0	524,244,574
GAS								
303	20303004	INTG MISC COMPUTR SOFTWARE	1,941,295			-609,759		1,331,536
381	20381000	DISTRIBUTION METERS	73,431,252	8,511,817	-1,723,479	709,980		80,929,571
381	20381010	DISTRIBUTION METERS-TELEMETER	639,249					639,249
383	20383000	DISTRIBUTION HOUSE REGULATORS	10,674,182					10,674,182
391	20391000	GENERAL OFFICE FURN & EQUIP	32,482					32,482
391.1	20391004	GENERAL INFO SYS COMPUTERS	2,297,153	21,445				2,318,598
392	20392020	GENERAL TRANSP EQ GRP 2-3	81,618	24,833				106,451
392	20392030	GENERAL TRANSP EQ TRAILERS	192,824					192,824
392	20392040	GENERAL TRANSP EQ GRP 4-8	1,102,569					1,102,569
394	20394000	GENERAL TOOLS & SHOP EQUIPMENT	5,525,510	347,382				5,872,892
395	20395000	GENERAL LABORATORY EQUIPMENT	55,423					55,423
396	20396000	GENERAL POWER OPERATED EQUIP	667,393	66,375				733,768
397	20397000	GENERAL COMMUNICATIONS EQUIP	2,251,212	217,294				2,468,506
397	20397010	GENERAL COMMUNICATIONS EQUIP	82,489					82,489
398	20398000	GENERAL MISCELLANEOUS EQUIP	102,602					102,602
	TOTAL		99,077,253	9,189,146	-1,723,479	100,222	0	106,643,141
COMMON								
303	40303004	INTG MISC COMPUTR SOFTWARE	112,615,226	21,458		609,759		113,246,443
391	40391000	GENERAL OFFICE FURN & EQUIP	25,147,492	1,105,928				26,253,420
391.1	40391004	GENERAL INFO SYS COMPUTERS	42,522,004	20,418,412				62,940,415
391.1	40391010	GENERAL INFO SYS-MAIN FRAME	30,349,450	98				30,349,548
392	40392020	GENERAL TRANSP EQ GRP 2-3	108,012					108,012
392	40392040	GENERAL TRANSP EQ GRP 4-8	35,125					35,125
393	40393000	GENERAL STORES EQUIPMENT	942,196					942,196
394	40394000	GENERAL TOOLS & SHOP EQUIPMENT	4,434,362	7,050				4,441,413
395	40395000	GENERAL LABORATORY EQUIPMENT	35,983					35,983
396	40396000	GENERAL POWER OPERATED EQUIP	4,968					4,968
397	40397000	GENERAL COMMUNICATIONS EQUIP	16,955,993	74,083				17,030,076
397	40397010	GENERAL COMMUNICATIONS EQUIP	10,586,779	1,165,476				11,752,255
398	40398000	GENERAL MISCELLANEOUS EQUIP	961,630	178,750				1,140,381
	TOTAL		244,699,221	22,971,255	0	609,759	0	268,280,235
		VINTAGE GROUP TOTALS	862,719,854	59,599,511	-23,981,214	829,799	0	899,167,950

NORTHERN STATES POWER COMPANY
2002 PLANT IN SERVICE

SCHEDULE F

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	ADDITIONS	RETIREMENTS	TRANSFERS	ADJUSTMENTS	ENDING BALANCE
ELECTRIC								
303	10303004	INTG MISC COMPUTR SOFTWARE	5,165,248	4,169,338				9,334,586
368	10368000	DISTRIBUTION LINE TRANSFORMERS	274,685,394	3,958,506	-2,025			278,641,875
368	10368010	DISTRIBUTION LINE CAPACITORS	16,366,806	455,912	-45,274			16,777,443
370	10370000	DISTRIBUTION METERS	105,060,119	627,592				105,687,711
391	10391000	GENERAL OFFICE FURN & EQUIP	5,881,205	715,398				6,596,604
391.1	10391004	GENERAL INFO SYS COMPUTERS	27,097,294	299,138				27,396,432
392	10392020	GENERAL TRANSP EQ GRP 2-3	424,718					424,718
392	10392030	GENERAL TRANSP EQ TRAILERS	1,170,705					1,170,705
392	10392040	GENERAL TRANSP EQ GRP 4-8	11,836,276					11,836,276
393	10393000	GENERAL STORES EQUIPMENT	1,995,818	8,157	-2,370			2,001,604
394	10394000	GENERAL TOOLS & SHOP EQUIPMENT	31,621,713	2,586,599	-1,132,441			33,075,870
395	10395000	GENERAL LABORATORY EQUIPMENT	9,683,795	53,201	-2,490,203			7,246,794
396	10396000	GENERAL POWER OPERATED EQUIP	1,764,702	26,016				1,790,719
397	10397000	GENERAL COMMUNICATIONS EQUIP	10,759,157	1,423,876	-3,048,700			9,134,333
397	10397010	GENERAL COMMUNICATIONS EQUIP	1,598,097	19,682	-495,151			1,122,628
397	10397030	GENERAL COMMUNICATE EQUIP-EMS	18,398,283		-85,517			18,312,766
398	10398000	GENERAL MISCELLANEOUS EQUIP	735,244	142,449	-265,784			611,908
	TOTAL		524,244,574	14,485,864	-7,567,465	0	0	531,162,972
GAS								
303	20303004	INTG MISC COMPUTR SOFTWARE	1,331,536					1,331,536
381	20381000	DISTRIBUTION METERS	80,929,571	2,405,017				83,334,587
381	20381010	DISTRIBUTION METERS-TELEMETER	639,249					639,249
383	20383000	DISTRIBUTION HOUSE REGULATORS	10,674,182					10,674,182
391	20391000	GENERAL OFFICE FURN & EQUIP	32,482	87				32,569
391.1	20391004	GENERAL INFO SYS COMPUTERS	2,318,598	1,934	-211,126			2,109,405
392	20392020	GENERAL TRANSP EQ GRP 2-3	106,451					106,451
392	20392030	GENERAL TRANSP EQ TRAILERS	192,824					192,824
392	20392040	GENERAL TRANSP EQ GRP 4-8	1,102,569					1,102,569
394	20394000	GENERAL TOOLS & SHOP EQUIPMENT	5,872,892	63,104	-59,775			5,876,221
395	20395000	GENERAL LABORATORY EQUIPMENT	55,423					55,423
396	20396000	GENERAL POWER OPERATED EQUIP	733,768					733,768
397	20397000	GENERAL COMMUNICATIONS EQUIP	2,468,506	30,791				2,499,297
397	20397010	GENERAL COMMUNICATIONS EQUIP	82,489					82,489
398	20398000	GENERAL MISCELLANEOUS EQUIP	102,602		-33,743			68,859
	TOTAL		106,643,141	2,500,932	-304,645	0	0	108,839,428
COMMON								
303	40303004	INTG MISC COMPUTR SOFTWARE	113,246,443	19,263,822				132,510,266
391	40391000	GENERAL OFFICE FURN & EQUIP	26,253,420	2,921,708	-11,807			29,163,320
391.1	40391004	GENERAL INFO SYS COMPUTERS	62,940,415	8,051,744				70,992,159
391.1	40391010	GENERAL INFO SYS-MAIN FRAME	30,349,548		-852,835			29,496,713
392	40392020	GENERAL TRANSP EQ GRP 2-3	108,012					108,012
392	40392040	GENERAL TRANSP EQ GRP 4-8	35,125					35,125
393	40393000	GENERAL STORES EQUIPMENT	942,196					942,196
394	40394000	GENERAL TOOLS & SHOP EQUIPMENT	4,441,413	36,222	-1,946,499			2,531,136
395	40395000	GENERAL LABORATORY EQUIPMENT	35,983		-26,373			9,610
396	40396000	GENERAL POWER OPERATED EQUIP	4,968					4,968
397	40397000	GENERAL COMMUNICATIONS EQUIP	17,030,076	2,228,770	-2,147,381			17,111,466
397	40397010	GENERAL COMMUNICATIONS EQUIP	11,752,255	234,062	-3,669,806			8,316,510
398	40398000	GENERAL MISCELLANEOUS EQUIP	1,140,381	217,157	-225,190			1,132,347
	TOTAL		268,280,235	32,953,485	-8,879,892	0	0	292,353,828
		VINTAGE GROUP TOTALS	899,167,950	49,940,280	-16,752,002	0	0	932,356,228

SCHEDULE G
ACCUMULATED DEPRECIATION

NORTHERN STATES POWER COMPANY
1998 ANALYSIS OF DEPRECIATION RESERVE

SCHEDULE G

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS ACCRUALS	CREDITS GROSS SALVAGE	DEBITS RETIREMENTS	DEBITS COST OF REMOVAL	TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
ELECTRIC									
303	511014	INTG MISC COMPUTR SOFTWARE	2,101,391	505,776					2,607,167
368	511631	DISTRIBUTION LINE TRANSFORMERS	75,422,820	6,551,295	146,111	2,727,805		604,242	79,996,663
368	511633	DISTRIBUTION LINE CAPACITORS	5,181,223	589,969	3,141	261,760	12,130	37,797	5,538,240
370	511651	DISTRIBUTION METERS	16,718,745	3,871,606	50,374	11,311,277		351,865	9,681,313
391	511925	GENERAL OFFICE FURN & EQUIP	1,787,352	231,199					2,018,551
391.1	511926	GENERAL INFO SYS COMPUTERS	11,106,520	4,373,509		92,304			15,387,724
392	511928	GENERAL TRANSP EQ GRP 2-3	5,019,389	239,575	39,503				5,298,467
392	511929	GENERAL TRANSP EQ TRAILERS	1,682,446	141,315	9,547				1,833,308
392	511931	GENERAL TRANSP EQ GRP 4-8	18,175,579	1,287,054	372,820		2,414		19,833,039
393	511930	GENERAL STORES EQUIPMENT	862,718	87,477					950,195
394	511944	GENERAL TOOLS & SHOP EQUIPMENT	8,234,422	1,645,559	15,000				9,894,981
395	511950	GENERAL LABORATORY EQUIPMENT	3,218,135	738,076					3,956,211
396	511963	GENERAL POWER OPERATED EQUIP	3,691,268	269,275	128,377	75,609	1,547		4,011,765
397	511970	GENERAL COMMUNICATIONS EQUIP	6,440,649	440,577		9,039	1,870	-837,161	6,033,156
397	511972	GENERAL COMMUNICATIONS EQUIP	583,223	128,114		60,000			651,337
397	511976	GENERAL COMMUNICATE EQUIP-EMS	-4,724,552	1,890,812			14,658	5,337,754	2,489,356
398	511980	GENERAL MISCELLANEOUS EQUIP	334,855	25,459					360,314
	TOTAL		155,836,182	23,016,647	764,875	14,537,794	32,619	5,494,497	170,541,787
GAS									
303	521014	INTG MISC COMPUTR SOFTWARE	0	0					0
381	521615	DISTRIBUTION METERS	22,319,735	2,069,350	128,550	1,517,478		189,372	23,189,530
381	521617	DISTRIBUTION METERS-TELEMETER	134,297	64,789					199,086
383	521619	DISTRIBUTION HOUSE REGULATORS	4,114,017	277,550		280,396		-2,458	4,108,713
391	521921	GENERAL OFFICE FURN & EQUIP	-313	931					618
391.1	521926	GENERAL INFO SYS COMPUTERS	1,112,639	281,476					1,394,115
392	521928	GENERAL TRANSP EQ GRP 2-3	1,164,502	71,636	17,941		685		1,253,394
392	521929	GENERAL TRANSP EQ TRAILERS	137,763	17,614	2,856				158,233
392	521931	GENERAL TRANSP EQ GRP 4-8	1,558,956	136,189	18,606				1,713,751
394	521942	GENERAL TOOLS & SHOP EQUIPMENT	1,475,256	311,027	280				1,786,563
395	521950	GENERAL LABORATORY EQUIPMENT	16,234	5,556					21,790
396	521963	GENERAL POWER OPERATED EQUIP	1,118,703	86,064	41,100		342		1,245,525
397	521970	GENERAL COMMUNICATIONS EQUIP	554,290	223,045		11,442			765,893
397	521972	GENERAL COMMUNICATIONS EQUIP	3,946	6,453					10,399
398	521980	GENERAL MISCELLANEOUS EQUIP	35,332	4,668					40,000
	TOTAL		33,745,357	3,556,349	209,334	1,809,316	1,027	186,914	35,887,610
COMMON									
303	581014	INTG MISC COMPUTR SOFTWARE	24,281,008	9,492,218		6,311,278			27,461,947
391	581921	GENERAL OFFICE FURN & EQUIP	3,894,190	1,106,019					5,000,209
391.1	581922	GENERAL INFO SYS COMPUTERS	25,857,713	8,469,139	-10,932			9,743	34,325,663
391.1	581920	GENERAL INFO SYS-MAIN FRAME	23,944,769	1,592,720		260,729			25,276,761
392	581924	GENERAL TRANSP EQ GRP 2-3	182,729	15,920					198,650
392	581926	GENERAL TRANSP EQ GRP 4-8	24,157	2,784					26,941
393	581927	GENERAL STORES EQUIPMENT	489,629	44,476					534,105
394	581929	GENERAL TOOLS & SHOP EQUIPMENT	1,910,436	454,589			-50		2,365,075
395	581935	GENERAL LABORATORY EQUIPMENT	19,425	3,588					23,013
396	581941	GENERAL POWER OPERATED EQUIP	6,521	413					6,934
397	581943	GENERAL COMMUNICATIONS EQUIP	4,706,504	1,681,932		57,550			6,330,886
397	581950	GENERAL COMMUNICATIONS EQUIP	5,639,996	498,801		1,629,911	-95,945		4,604,831
398	581991	GENERAL MISCELLANEOUS EQUIP	431,920	48,721					480,641
	TOTAL		91,388,997	23,411,320	-10,932	8,259,468	-95,995	9,743	106,635,655
		VINTAGE GROUP TOTALS	280,970,536	49,984,315	963,276	24,606,578	-62,349	5,691,154	313,065,052

NORTHERN STATES POWER COMPANY
1999 ANALYSIS OF DEPRECIATION RESERVE

SCHEDULE G

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS: ACCRUALS	CREDITS: GROSS SALVAGE	DEBITS: RETIREMENTS	DEBITS: COST OF REMOVAL	TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
ELECTRIC									
303	511014	INTG MISC COMPUTR SOFTWARE	2,607,167	459,518					3,066,685
368	511631	DISTRIBUTION LINE TRANSFORMERS	79,996,663	6,856,349	353,318	2,909,021	46,941	484,076	84,734,444
368	511633	DISTRIBUTION LINE CAPACITORS	5,538,240	611,686	4,129	209,316	5,540	-19,888	5,919,311
370	511651	DISTRIBUTION METERS	9,681,313	3,718,421	42,553	7,014,791		184,707	6,612,203
391	511925	GENERAL OFFICE FURN & EQUIP	2,018,551	241,940		158,432			2,102,059
391.1	511926	GENERAL INFO SYS COMPUTERS	15,387,724	4,567,966		8,457,771			11,497,920
392	511928	GENERAL TRANSP EQ GRP 2-3	5,298,467	64,731	33,168	5,509,747	1,131		-114,513
392	511929	GENERAL TRANSP EQ TRAILERS	1,833,308	123,936	10,179	1,171,529			795,894
392	511931	GENERAL TRANSP EQ GRP 4-8	19,833,039	972,723	264,641	11,574,988	1,388		9,494,027
393	511930	GENERAL STORES EQUIPMENT	950,195	86,416					1,036,611
394	511944	GENERAL TOOLS & SHOP EQUIPMENT	9,894,981	1,779,425					11,674,406
395	511950	GENERAL LABORATORY EQUIPMENT	3,956,211	770,899					4,727,110
396	511963	GENERAL POWER OPERATED EQUIP	4,011,765	196,983	59,784	3,051,840	316		1,216,375
397	511970	GENERAL COMMUNICATIONS EQUIP	6,033,156	797,625		320	142		6,830,319
397	511972	GENERAL COMMUNICATIONS EQUIP	651,337	123,418					774,755
397	511976	GENERAL COMMUNICATE EQUIP-EMS	2,489,356	1,887,171					4,376,527
398	511980	GENERAL MISCELLANEOUS EQUIP	360,314	20,994	12,000				393,308
	TOTAL		170,541,787	23,280,200	779,771	40,057,754	55,458	648,896	155,137,441
GAS									
303	521014	INTG MISC COMPUTR SOFTWARE	0	99,424					99,424
381	521615	DISTRIBUTION METERS	23,189,530	2,222,025	53,435	1,844,189		144,930	23,765,730
381	521617	DISTRIBUTION METERS-TELEMETER	199,086	75,144					274,230
383	521619	DISTRIBUTION HOUSE REGULATORS	4,108,713	270,552					4,379,265
391	521921	GENERAL OFFICE FURN & EQUIP	618	1,529					2,147
391.1	521926	GENERAL INFO SYS COMPUTERS	1,394,115	385,380		1,166,273			613,222
392	521928	GENERAL TRANSP EQ GRP 2-3	1,253,394	20,952	4,761	1,345,836			-66,728
392	521929	GENERAL TRANSP EQ TRAILERS	158,233	17,674		74,525			101,382
392	521931	GENERAL TRANSP EQ GRP 4-8	1,713,751	101,488	26,880	984,534			857,584
394	521942	GENERAL TOOLS & SHOP EQUIPMENT	1,786,563	329,075					2,115,638
395	521950	GENERAL LABORATORY EQUIPMENT	21,790	5,556					27,346
396	521963	GENERAL POWER OPERATED EQUIP	1,245,525	70,763	3,469	851,683			468,073
397	521970	GENERAL COMMUNICATIONS EQUIP	765,893	231,200					997,093
397	521972	GENERAL COMMUNICATIONS EQUIP	10,399	8,352					18,751
398	521980	GENERAL MISCELLANEOUS EQUIP	40,000	5,280					45,280
	TOTAL		35,887,610	3,844,394	88,544	6,267,041	0	144,930	33,698,437
COMMON									
303	581014	INTG MISC COMPUTR SOFTWARE	27,461,947	9,934,569					37,396,516
391	581921	GENERAL OFFICE FURN & EQUIP	5,000,209	1,142,417	375	1,075,520		-378	5,067,103
391.1	581922	GENERAL INFO SYS COMPUTERS	34,325,663	8,788,126	-10,257	16,668,614	21,124	-25,717	26,388,077
391.1	581920	GENERAL INFO SYS-MAIN FRAME	25,276,761	2,108,190					27,384,951
392	581924	GENERAL TRANSP EQ GRP 2-3	198,650	11,496	8,268	154,383	157		63,875
392	581926	GENERAL TRANSP EQ GRP 4-8	26,941	2,784					29,725
393	581927	GENERAL STORES EQUIPMENT	534,105	43,409					577,514
394	581929	GENERAL TOOLS & SHOP EQUIPMENT	2,365,075	454,101			-2,225		2,821,401
395	581935	GENERAL LABORATORY EQUIPMENT	23,013	3,588					26,601
396	581941	GENERAL POWER OPERATED EQUIP	6,934	462		6,445			950
397	581943	GENERAL COMMUNICATIONS EQUIP	6,330,886	1,655,113					7,985,999
397	581950	GENERAL COMMUNICATIONS EQUIP	4,604,831	550,954					5,155,785
398	581991	GENERAL MISCELLANEOUS EQUIP	480,641	52,914					533,555
	TOTAL		106,635,655	24,748,123	-1,614	17,904,962	19,056	-26,095	113,432,052
		VINTAGE GROUP TOTALS	313,065,052	51,872,717	866,701	64,229,756	74,514	767,731	302,267,931

NORTHERN STATES POWER COMPANY
2000 ANALYSIS OF DEPRECIATION RESERVE

SCHEDULE G

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS: ACCRUALS	CREDITS: GROSS SALVAGE	DEBITS: RETIREMENTS	DEBITS: COST OF REMOVAL	TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
ELECTRIC									
303	511014	INTG MISC COMPUTR SOFTWARE	3,066,685	582,965		547,662		488,350	3,590,338
368	511631	DISTRIBUTION LINE TRANSFORMERS	84,734,444	7,128,021	323,211	2,992,619	39,476	140,755	89,294,337
368	511633	DISTRIBUTION LINE CAPACITORS	5,919,311	631,960	425	152,101	4,585	-2,438	6,392,572
370	511651	DISTRIBUTION METERS	6,612,203	3,832,947	42,596	10,592,787	-30,318	590,850	516,127
391	511925	GENERAL OFFICE FURN & EQUIP	2,102,059	255,982	1,250				2,359,291
391.1	511926	GENERAL INFO SYS COMPUTERS	11,497,920	4,031,732	1,150				15,530,802
392	511928	GENERAL TRANSP EQ GRP 2-3	-114,513	37,038	28,217		-1,339	63,563	15,644
392	511929	GENERAL TRANSP EQ TRAILERS	795,894	98,799	2,896			-63,563	834,026
392	511931	GENERAL TRANSP EQ GRP 4-8	9,494,027	692,318	7,625	51,945	-59,565	457,833	10,659,423
393	511930	GENERAL STORES EQUIPMENT	1,036,611	84,929					1,121,540
394	511944	GENERAL TOOLS & SHOP EQUIPMENT	11,674,406	1,936,415					13,610,821
395	511950	GENERAL LABORATORY EQUIPMENT	4,727,110	795,755					5,522,865
396	511963	GENERAL POWER OPERATED EQUIP	1,216,375	143,288					1,359,663
397	511970	GENERAL COMMUNICATIONS EQUIP	6,830,319	836,661		2,597	210		7,664,174
397	511972	GENERAL COMMUNICATIONS EQUIP	774,755	147,533					922,288
397	511976	GENERAL COMMUNICATE EQUIP-EMS	4,376,527	2,027,334					6,403,861
398	511980	GENERAL MISCELLANEOUS EQUIP	393,308	13,622					406,930
	TOTAL		155,137,441	23,277,299	407,371	14,339,711	-46,951	1,675,350	166,204,702
GAS									
303	521014	INTG MISC COMPUTR SOFTWARE	99,424	322,107					421,531
381	521615	DISTRIBUTION METERS	23,765,730	2,334,997	8,590	2,353,706		37,326	23,792,937
381	521617	DISTRIBUTION METERS-TELEMETER	274,230	75,807					350,037
383	521619	DISTRIBUTION HOUSE REGULATORS	4,379,265	270,152		394,421			4,254,996
391	521921	GENERAL OFFICE FURN & EQUIP	2,147	1,641					3,788
391.1	521926	GENERAL INFO SYS COMPUTERS	613,222	468,528					1,081,750
392	521928	GENERAL TRANSP EQ GRP 2-3	-66,728	7,344	5,624		-319	3,380	-50,061
392	521929	GENERAL TRANSP EQ TRAILERS	101,382	16,887				-3,380	114,888
392	521931	GENERAL TRANSP EQ GRP 4-8	857,584	72,615	21,289		-1,381		952,869
394	521942	GENERAL TOOLS & SHOP EQUIPMENT	2,115,638	354,303			-1,065		2,471,006
395	521950	GENERAL LABORATORY EQUIPMENT	27,346	5,556					32,902
396	521963	GENERAL POWER OPERATED EQUIP	468,073	55,446					523,519
397	521970	GENERAL COMMUNICATIONS EQUIP	997,093	246,929					1,244,022
397	521972	GENERAL COMMUNICATIONS EQUIP	18,751	8,960					27,711
398	521980	GENERAL MISCELLANEOUS EQUIP	45,280	6,457					51,737
	TOTAL		33,698,437	4,247,729	0	2,748,127	-2,765	37,326	35,273,633
COMMON									
303	581014	INTG MISC COMPUTR SOFTWARE	37,396,516	11,685,244					49,081,760
391	581921	GENERAL OFFICE FURN & EQUIP	5,067,103	1,231,913	1,500		35,462		6,265,054
391.1	581922	GENERAL INFO SYS COMPUTERS	26,388,077	6,268,965			15,835	-6,900	32,634,307
391.1	581920	GENERAL INFO SYS-MAIN FRAME	27,384,951	1,590,020					28,974,971
392	581924	GENERAL TRANSP EQ GRP 2-3	63,875	9,732				-3,150	70,457
392	581926	GENERAL TRANSP EQ GRP 4-8	29,725	493				3,150	33,368
393	581927	GENERAL STORES EQUIPMENT	577,514	42,517					620,031
394	581929	GENERAL TOOLS & SHOP EQUIPMENT	2,821,401	437,995					3,259,396
395	581935	GENERAL LABORATORY EQUIPMENT	26,601	3,588					30,189
396	581941	GENERAL POWER OPERATED EQUIP	950	444					1,394
397	581943	GENERAL COMMUNICATIONS EQUIP	7,985,999	1,716,399					9,702,398
397	581950	GENERAL COMMUNICATIONS EQUIP	5,155,785	558,746					5,714,531
398	581991	GENERAL MISCELLANEOUS EQUIP	533,555	51,475					585,030
	TOTAL		113,432,052	23,597,531	1,500	0	51,297	-6,900	136,972,887
		VINTAGE GROUP TOTALS	302,267,931	51,122,559	408,871	17,087,838	1,580	1,705,776	338,451,222

NORTHERN STATES POWER COMPANY
2001 ANALYSIS OF DEPRECIATION RESERVE

SCHEDULE G

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS ACCRUALS	CREDITS GROSS SALVAGE	DEBITS RETIREMENTS	DEBITS COST OF REMOVAL	TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
ELECTRIC									
303	10303004	INTG MISC COMPUTR SOFTWARE	3,590,338	434,647					4,024,985
368	10368000	DISTRIBUTION LINE TRANSFORMERS	89,294,337	6,936,319	166,034	17,667,060	14,809		78,714,822
368	10368010	DISTRIBUTION LINE CAPACITORS	6,392,572	650,436	2,597	115,175	4,000		6,926,430
370	10370000	DISTRIBUTION METERS	516,127	4,065,262	7,530	4,473,775		32,092	147,235
391	10391000	GENERAL OFFICE FURN & EQUIP	2,359,291	290,896					2,650,188
391.1	10391004	GENERAL INFO SYS COMPUTERS	15,530,802	3,929,448					19,460,250
392	10392020	GENERAL TRANSP EQ GRP 2-3	15,644	38,145					53,789
392	10392030	GENERAL TRANSP EQ TRAILERS	834,026	77,561					911,587
392	10392040	GENERAL TRANSP EQ GRP 4-8	10,659,423	429,148	16,932				11,105,503
393	10393000	GENERAL STORES EQUIPMENT	1,121,540	83,894					1,205,434
394	10394000	GENERAL TOOLS & SHOP EQUIPMENT	13,610,821	2,054,262					15,665,083
395	10395000	GENERAL LABORATORY EQUIPMENT	5,522,865	824,356					6,347,221
396	10396000	GENERAL POWER OPERATED EQUIP	1,359,663	133,187					1,492,850
397	10397000	GENERAL COMMUNICATIONS EQUIP	7,664,174	876,888		1,725	1,610		8,537,726
397	10397010	GENERAL COMMUNICATIONS EQUIP	922,288	148,423				-24,729	1,045,982
397	10397030	GENERAL COMMUNICATE EQUIP-EMS	6,403,861	1,992,110					8,395,971
398	10398000	GENERAL MISCELLANEOUS EQUIP	406,930	23,628					430,757
		TOTAL	166,204,702	22,988,811	193,093	22,257,735	20,419	7,363	167,115,814
GAS									
303	20303004	INTG MISC COMPUTR SOFTWARE	421,531	273,583					695,114
381	20381000	DISTRIBUTION METERS	23,792,937	2,497,974	490	1,723,479		267,178	24,835,100
381	20381010	DISTRIBUTION METERS-TELEMETER	350,037	79,915					429,952
383	20383000	DISTRIBUTION HOUSE REGULATORS	4,254,996	260,918					4,515,913
391	20391000	GENERAL OFFICE FURN & EQUIP	3,788	1,708					5,496
391.1	20391004	GENERAL INFO SYS COMPUTERS	1,081,750	485,491				15,085	1,582,326
392	20392020	GENERAL TRANSP EQ GRP 2-3	-50,060	8,276				23,333	-18,452
392	20392030	GENERAL TRANSP EQ TRAILERS	114,888	14,411					129,299
392	20392040	GENERAL TRANSP EQ GRP 4-8	952,869	61,284					1,014,153
394	20394000	GENERAL TOOLS & SHOP EQUIPMENT	2,471,006	376,359				33,886	2,881,251
395	20395000	GENERAL LABORATORY EQUIPMENT	32,902	3,472					36,374
396	20396000	GENERAL POWER OPERATED EQUIP	523,519	38,881				57,822	620,223
397	20397000	GENERAL COMMUNICATIONS EQUIP	1,244,022	255,523				11,272	1,510,817
397	20397010	GENERAL COMMUNICATIONS EQUIP	27,711	9,174					36,885
398	20398000	GENERAL MISCELLANEOUS EQUIP	51,737	5,546					57,284
		TOTAL	35,273,633	4,372,516	490	1,723,479	0	408,576	38,331,737
COMMON									
303	40303004	INTG MISC COMPUTR SOFTWARE	49,081,760	13,350,153					62,431,914
391	40391000	GENERAL OFFICE FURN & EQUIP	6,265,054	1,375,465					7,640,519
391.1	40391004	GENERAL INFO SYS COMPUTERS	32,634,307	5,291,103			5,805		37,919,606
391.1	40391010	GENERAL INFO SYS-MAIN FRAME	28,974,971	1,000,297					29,975,268
392	40392020	GENERAL TRANSP EQ GRP 2-3	70,457	9,727					80,184
392	40392040	GENERAL TRANSP EQ GRP 4-8	33,368						33,368
393	40393000	GENERAL STORES EQUIPMENT	620,031	42,087					662,118
394	40394000	GENERAL TOOLS & SHOP EQUIPMENT	3,259,396	198,627					3,458,023
395	40395000	GENERAL LABORATORY EQUIPMENT	30,189	3,084					33,273
396	40396000	GENERAL POWER OPERATED EQUIP	1,394	445					1,839
397	40397000	GENERAL COMMUNICATIONS EQUIP	9,702,398	1,789,381					11,491,779
397	40397010	GENERAL COMMUNICATIONS EQUIP	5,714,531	822,799					6,537,330
398	40398000	GENERAL MISCELLANEOUS EQUIP	585,030	55,054					640,084
		TOTAL	136,972,887	23,938,222	0	0	5,805	0	160,905,304
		VINTAGE GROUP TOTALS	338,451,222	51,299,549	193,583	23,981,214	26,223	415,939	366,352,855

NORTHERN STATES POWER COMPANY
2002 ANALYSIS OF DEPRECIATION RESERVE

SCHEDULE G

UTILITY ACCOUNTS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING BALANCE	CREDITS ACCRUALS	CREDITS GROSS SALVAGE	DEBITS RETIREMENTS	DEBITS COST OF REMOVAL	TRANSFERS ADJUSTMENTS AND OTHER CREDITS (DEBITS)	ENDING BALANCE
ELECTRIC									
303	10303004	INTG MISC COMPUTR SOFTWARE	4,024,985	414,356					4,439,341
368	10368000	DISTRIBUTION LINE TRANSFORMERS	78,714,822	7,117,425		2,025	45		85,830,178
368	10368010	DISTRIBUTION LINE CAPACITORS	6,926,430	663,218	585	45,274	15,705		7,529,254
370	10370000	DISTRIBUTION METERS	147,235	4,214,167	23,518		-173,349		4,558,269
391	10391000	GENERAL OFFICE FURN & EQUIP	2,650,188	319,522					2,969,710
391.1	10391004	GENERAL INFO SYS COMPUTERS	19,460,250	3,619,966					23,080,216
392	10392020	GENERAL TRANSP EQ GRP 2-3	53,789	38,225	969		969		92,013
392	10392030	GENERAL TRANSP EQ TRAILERS	911,587	71,717	358		358		983,304
392	10392040	GENERAL TRANSP EQ GRP 4-8	11,105,503	391,818	7,297		7,297		11,497,321
393	10393000	GENERAL STORES EQUIPMENT	1,205,434	82,336		2,370			1,285,399
394	10394000	GENERAL TOOLS & SHOP EQUIPMENT	15,665,083	2,057,871		1,132,441	588		16,589,925
395	10395000	GENERAL LABORATORY EQUIPMENT	6,347,221	777,143		2,490,202			4,634,162
396	10396000	GENERAL POWER OPERATED EQUIP	1,492,850	105,791					1,598,641
397	10397000	GENERAL COMMUNICATIONS EQUIP	8,537,726	781,335		3,048,699			6,270,362
397	10397010	GENERAL COMMUNICATIONS EQUIP	1,045,982	123,217		495,151			674,048
397	10397030	GENERAL COMMUNICATE EQUIP-EMS	8,395,971	1,916,069		85,517			10,226,523
398	10398000	GENERAL MISCELLANEOUS EQUIP	430,757	31,865		265,784			196,838
	TOTAL		167,115,814	22,726,039	32,726	7,567,465	-148,388	0	182,455,504
GAS									
303	20303004	INTG MISC COMPUTR SOFTWARE	695,114	271,579					966,693
381	20381000	DISTRIBUTION METERS	24,835,100	2,687,065	351,559		348,458		27,525,266
381	20381010	DISTRIBUTION METERS-TELEMETER	429,952	79,909					509,861
383	20383000	DISTRIBUTION HOUSE REGULATORS	4,515,913	260,920					4,776,833
391	20391000	GENERAL OFFICE FURN & EQUIP	5,496	1,716					7,213
391.1	20391004	GENERAL INFO SYS COMPUTERS	1,582,326	460,692		211,126			1,831,892
392	20392020	GENERAL TRANSP EQ GRP 2-3	-18,452	9,580			-9,240		369
392	20392030	GENERAL TRANSP EQ TRAILERS	129,299	11,870					141,169
392	20392040	GENERAL TRANSP EQ GRP 4-8	1,014,153	64,274					1,078,427
394	20394000	GENERAL TOOLS & SHOP EQUIPMENT	2,881,251	389,582		59,775			3,211,058
395	20395000	GENERAL LABORATORY EQUIPMENT	36,374	554					36,928
396	20396000	GENERAL POWER OPERATED EQUIP	620,223	18,689					638,912
397	20397000	GENERAL COMMUNICATIONS EQUIP	1,510,817	274,413					1,785,231
397	20397010	GENERAL COMMUNICATIONS EQUIP	36,885	9,165					46,050
398	20398000	GENERAL MISCELLANEOUS EQUIP	57,284	4,723		33,743			28,264
	TOTAL		38,331,737	4,544,732	351,559	304,645	339,218	0	42,584,165
COMMON									
303	40303004	INTG MISC COMPUTR SOFTWARE	62,431,914	16,388,361					78,820,275
391	40391000	GENERAL OFFICE FURN & EQUIP	7,640,519	1,393,003		11,807			9,021,714
391.1	40391004	GENERAL INFO SYS COMPUTERS	37,919,606	9,560,867					47,480,473
391.1	40391010	GENERAL INFO SYS-MAIN FRAME	29,975,268	379,945		852,835		1,705,670	31,208,048
392	40392020	GENERAL TRANSP EQ GRP 2-3	80,184	9,382					89,566
392	40392040	GENERAL TRANSP EQ GRP 4-8	33,368						33,368
393	40393000	GENERAL STORES EQUIPMENT	662,118	39,962					702,080
394	40394000	GENERAL TOOLS & SHOP EQUIPMENT	3,458,023	185,717		1,946,499			1,697,241
395	40395000	GENERAL LABORATORY EQUIPMENT	33,273	1,170		26,373			8,070
396	40396000	GENERAL POWER OPERATED EQUIP	1,839	447					2,287
397	40397000	GENERAL COMMUNICATIONS EQUIP	11,491,779	1,757,193		2,147,381			11,101,591
397	40397010	GENERAL COMMUNICATIONS EQUIP	6,537,330	842,833		3,669,806			3,710,357
398	40398000	GENERAL MISCELLANEOUS EQUIP	640,084	63,208		225,190			478,102
	TOTAL		160,905,304	30,622,089	0	8,879,892	0	1,705,670	184,353,172
		VINTAGE GROUP TOTALS	366,352,855	57,892,861	384,286	16,752,001	190,830	1,705,670	409,392,840

SCHEDULE H
ANNUAL DEPRECIATION ACCRUAL DETERMINATION

NORTHERN STATES POWER COMPANY
1998 SUMMARY OF ANNUAL DEPRECIATION ACCRUALS

SCHEDULE H

UTILITY TOTALS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING PLANT BALANCE	EST. FUTURE NET SALVAGE %	EST. FUTURE NET SALVAGE AMOUNT	BEGINNING DEPRECIATION RESERVE	NET BALANCE	DEPR LIFE (YRS)	ANNUAL ACCRUAL	DEPR RATE	RESERVE RATIO
ELECTRIC											
303	511014	INTG MISC COMPUTR SOFTWARE	3,123,766	0%	0	2,101,391	1,022,375	5.0	505,776	20.00%	67.27%
368	511631	DISTRIBUTION LINE TRANSFORMERS	248,191,674	10%	24,819,167	75,422,820	147,949,687	35.0	6,551,295	2.57%	33.77%
368	511633	DISTRIBUTION LINE CAPACITORS	14,313,251	0%	0	5,181,223	9,132,028	25.0	589,969	4.00%	36.20%
370	511651	DISTRIBUTION METERS	97,197,014	0%	0	16,718,745	80,478,269	25.0	3,871,606	4.00%	17.20%
391	511925	GENERAL OFFICE FURN & EQUIP	4,516,456	5%	225,823	1,787,352	2,503,281	18.0	231,199	5.28%	41.66%
391.1	511926	GENERAL INFO SYS COMPUTERS	20,577,553	0%	0	11,106,520	9,471,033	4.0	4,373,509	25.00%	53.97%
392	511928	GENERAL TRANSP EQ GRP 2-3	5,934,465	10%	593,447	5,019,389	321,630	10.0	239,575	9.00%	93.98%
392	511929	GENERAL TRANSP EQ TRAILERS	2,342,234	10%	234,223	1,682,446	425,564	10.0	141,315	9.00%	79.81%
392	511931	GENERAL TRANSP EQ GRP 4-8	23,463,209	5%	1,173,160	18,175,579	4,114,470	12.0	1,287,054	7.92%	81.54%
393	511930	GENERAL STORES EQUIPMENT	1,988,358	5%	99,418	862,718	1,026,222	20.0	87,477	4.75%	45.67%
394	511944	GENERAL TOOLS & SHOP EQUIPMENT	24,250,978	0%	0	8,234,422	16,016,556	15.0	1,645,559	6.67%	33.96%
395	511950	GENERAL LABORATORY EQUIPMENT	7,197,619	0%	0	3,218,135	3,979,484	10.0	738,076	10.00%	44.71%
396	511963	GENERAL POWER OPERATED EQUIP	4,885,398	10%	488,540	3,691,268	705,591	10.0	269,275	9.00%	83.95%
397	511970	GENERAL COMMUNICATIONS EQUIP	10,532,275	0%	0	6,440,649	4,091,626	9.0	440,577	11.11%	61.15%
397	511972	GENERAL COMMUNICATIONS EQUIP	1,349,869	0%	0	583,223	766,646	9.0	128,114	11.11%	43.21%
397	511976	GENERAL COMMUNICATE EQUIP-EMS	10,436,522	0%	0	-4,724,552	15,161,074	9.0	1,890,812	11.11%	-45.27%
398	511980	GENERAL MISCELLANEOUS EQUIP	477,163	0%	0	334,855	142,308	15.0	25,459	6.67%	70.18%
	TOTAL		480,777,805		27,633,778	155,836,182	297,307,844		23,016,647		
GAS											
303	521014	INTG MISC COMPUTR SOFTWARE	0	0%	0	0	0	5.0	0	20.00%	0.00%
381	521615	DISTRIBUTION METERS	59,893,952	-15%	-8,984,093	22,319,735	46,558,309	35.0	2,069,350	3.29%	32.40%
381	521617	DISTRIBUTION METERS-TELEMETER	448,306	0%	0	134,297	314,009	8.0	64,789	12.50%	29.96%
383	521619	DISTRIBUTION HOUSE REGULATORS	11,368,758	-10%	-1,136,876	4,114,017	8,391,618	45.0	277,550	2.44%	32.90%
391	521921	GENERAL OFFICE FURN & EQUIP	4,331	5%	217	-313	4,427	18.0	931	5.28%	-7.61%
391.1	521926	GENERAL INFO SYS COMPUTERS	1,535,824	0%	0	1,112,639	423,186	4.0	281,476	25.00%	72.45%
392	521928	GENERAL TRANSP EQ GRP 2-3	1,427,454	10%	142,745	1,164,502	120,206	10.0	71,636	9.00%	90.64%
392	521929	GENERAL TRANSP EQ TRAILERS	267,350	10%	26,735	137,763	102,852	10.0	17,614	9.00%	57.25%
392	521931	GENERAL TRANSP EQ GRP 4-8	2,087,104	5%	104,355	1,558,956	423,793	12.0	136,189	7.92%	78.63%
394	521942	GENERAL TOOLS & SHOP EQUIPMENT	4,558,487	0%	0	1,475,256	3,083,231	15.0	311,027	6.67%	32.36%
395	521950	GENERAL LABORATORY EQUIPMENT	55,423	0%	0	16,234	39,188	10.0	5,556	10.00%	29.29%
396	521963	GENERAL POWER OPERATED EQUIP	1,519,077	10%	151,908	1,118,703	248,466	10.0	86,064	9.00%	81.83%
397	521970	GENERAL COMMUNICATIONS EQUIP	1,974,192	0%	0	554,290	1,419,903	9.0	223,045	11.11%	28.08%
397	521972	GENERAL COMMUNICATIONS EQUIP	29,473	0%	0	3,946	25,527	9.0	6,453	11.11%	13.39%
398	521980	GENERAL MISCELLANEOUS EQUIP	70,097	0%	0	35,332	34,765	15.0	4,668	6.67%	50.41%
	TOTAL		85,239,826		-9,695,009	33,745,357	61,189,478		3,556,349		
COMMON											
303	581014	INTG MISC COMPUTR SOFTWARE	80,619,403	0%	0	24,281,008	56,338,395	5.0	9,492,218	20.00%	30.12%
391	581921	GENERAL OFFICE FURN & EQUIP	20,222,017	5%	1,011,101	3,894,190	15,316,726	18.0	1,106,019	5.28%	20.27%
391.1	581922	GENERAL INFO SYS COMPUTERS	45,225,647	0%	0	25,857,713	19,367,934	4.0	8,469,139	25.00%	57.17%
391.1	581920	GENERAL INFO SYS-MAIN FRAME	28,831,850	0%	0	23,944,769	4,887,081	4.0	1,592,720	25.00%	83.05%
392	581924	GENERAL TRANSP EQ GRP 2-3	262,394	10%	26,239	182,729	53,426	10.0	15,920	9.00%	77.38%
392	581926	GENERAL TRANSP EQ GRP 4-8	35,125	5%	1,756	24,157	9,211	12.0	2,784	7.92%	72.40%
393	581927	GENERAL STORES EQUIPMENT	942,196	5%	47,110	489,629	405,458	20.0	44,476	4.75%	54.70%
394	581929	GENERAL TOOLS & SHOP EQUIPMENT	4,174,341	0%	0	1,910,436	2,263,906	15.0	454,589	6.67%	45.77%
395	581935	GENERAL LABORATORY EQUIPMENT	35,983	0%	0	19,425	16,558	10.0	3,588	10.00%	53.98%
396	581941	GENERAL POWER OPERATED EQUIP	11,414	10%	1,141	6,521	3,752	10.0	413	9.00%	63.48%
397	581943	GENERAL COMMUNICATIONS EQUIP	15,552,290	0%	0	4,706,504	10,845,786	9.0	1,681,932	11.11%	30.26%
397	581950	GENERAL COMMUNICATIONS EQUIP	7,084,516	0%	0	5,639,996	1,444,521	9.0	498,801	11.11%	79.61%
398	581991	GENERAL MISCELLANEOUS EQUIP	849,837	0%	0	431,920	417,916	15.0	48,721	6.67%	50.82%
	TOTAL		203,847,013		1,087,348	91,388,997	111,370,669		23,411,320		
		VINTAGE GROUP TOTALS	769,864,644		19,026,117	280,970,536	469,867,991		49,984,315		

NORTHERN STATES POWER COMPANY
1999 SUMMARY OF ANNUAL DEPRECIATION ACCRUALS

SCHEDULE H

UTILITY TOTALS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING PLANT BALANCE	EST. FUTURE NET SALVAGE %	EST. FUTURE NET SALVAGE AMOUNT	BEGINNING DEPRECIATION RESERVE	NET BALANCE	DEPR LIFE (YRS)	ANNUAL ACCRUAL	DEPR RATE	RESERVE RATIO
ELECTRIC											
303	511014	INTG MISC COMPUTR SOFTWARE	3,123,766	0%	0	2,607,167	516,599	5.0	459,518	20.00%	83.46%
368	511631	DISTRIBUTION LINE TRANSFORMERS	259,696,869	10%	25,969,687	79,996,663	153,730,519	35.0	6,856,349	2.57%	34.23%
368	511633	DISTRIBUTION LINE CAPACITORS	15,175,209	0%	0	5,538,240	9,636,969	25.0	611,686	4.00%	36.50%
370	511651	DISTRIBUTION METERS	93,342,352	0%	0	9,681,313	83,661,039	25.0	3,718,421	4.00%	10.37%
391	511925	GENERAL OFFICE FURN & EQUIP	4,628,095	5%	231,405	2,018,551	2,378,139	18.0	241,940	5.28%	45.91%
391.1	511926	GENERAL INFO SYS COMPUTERS	24,846,241	0%	0	15,387,724	9,458,517	4.0	4,567,966	25.00%	61.93%
392	511928	GENERAL TRANSP EQ GRP 2-3	5,934,465	10%	593,447	5,298,467	42,552	10.0	64,731	9.00%	99.20%
392	511929	GENERAL TRANSP EQ TRAILERS	2,342,234	10%	234,223	1,833,308	274,702	10.0	123,936	9.00%	86.97%
392	511931	GENERAL TRANSP EQ GRP 4-8	23,463,209	5%	1,173,160	19,833,039	2,457,010	12.0	972,723	7.92%	88.98%
393	511930	GENERAL STORES EQUIPMENT	1,995,818	5%	99,791	950,195	945,832	20.0	86,416	4.75%	50.12%
394	511944	GENERAL TOOLS & SHOP EQUIPMENT	26,170,329	0%	0	9,894,981	16,275,348	15.0	1,779,425	6.67%	37.81%
395	511950	GENERAL LABORATORY EQUIPMENT	7,799,055	0%	0	3,956,211	3,842,844	10.0	770,899	10.00%	50.73%
396	511963	GENERAL POWER OPERATED EQUIP	4,813,209	10%	481,321	4,011,765	320,123	10.0	196,983	9.00%	92.61%
397	511970	GENERAL COMMUNICATIONS EQUIP	9,543,330	0%	0	6,033,156	3,510,174	9.0	797,625	11.11%	63.22%
397	511972	GENERAL COMMUNICATIONS EQUIP	1,368,201	0%	0	651,337	716,864	9.0	123,418	11.11%	47.61%
397	511976	GENERAL COMMUNICATE EQUIP-EMS	16,603,340	0%	0	2,489,356	14,113,985	9.0	1,887,171	11.11%	14.99%
398	511980	GENERAL MISCELLANEOUS EQUIP	493,383	0%	0	360,314	133,069	15.0	20,994	6.67%	73.03%
	TOTAL		501,339,106		28,783,034	170,541,787	302,014,285		23,280,200		
GAS											
303	521014	INTG MISC COMPUTR SOFTWARE	0	0%	0	0	0	5.0	99,424	20.00%	0.00%
381	521615	DISTRIBUTION METERS	65,560,924	-15%	-9,834,139	23,189,530	52,205,532	35.0	2,222,025	3.29%	30.76%
381	521617	DISTRIBUTION METERS-TELEMETER	601,146	0%	0	199,086	402,060	8.0	75,144	12.50%	33.12%
383	521619	DISTRIBUTION HOUSE REGULATORS	11,068,603	-10%	-1,106,860	4,108,713	8,066,750	45.0	270,552	2.44%	33.75%
391	521921	GENERAL OFFICE FURN & EQUIP	28,478	5%	1,424	618	26,436	18.0	1,529	5.28%	2.28%
391.1	521926	GENERAL INFO SYS COMPUTERS	2,268,932	0%	0	1,394,115	874,818	4.0	385,380	25.00%	61.44%
392	521928	GENERAL TRANSP EQ GRP 2-3	1,427,454	10%	142,745	1,253,394	31,314	10.0	20,952	9.00%	97.56%
392	521929	GENERAL TRANSP EQ TRAILERS	267,350	10%	26,735	158,233	82,382	10.0	17,674	9.00%	65.76%
392	521931	GENERAL TRANSP EQ GRP 4-8	2,087,104	5%	104,355	1,713,751	268,998	12.0	101,488	7.92%	86.43%
394	521942	GENERAL TOOLS & SHOP EQUIPMENT	4,860,929	0%	0	1,786,563	3,074,366	15.0	329,075	6.67%	36.75%
395	521950	GENERAL LABORATORY EQUIPMENT	55,423	0%	0	21,790	33,632	10.0	5,556	10.00%	39.32%
396	521963	GENERAL POWER OPERATED EQUIP	1,519,077	10%	151,908	1,245,525	121,644	10.0	70,763	9.00%	91.10%
397	521970	GENERAL COMMUNICATIONS EQUIP	2,068,862	0%	0	765,893	1,302,970	9.0	231,200	11.11%	37.02%
397	521972	GENERAL COMMUNICATIONS EQUIP	75,004	0%	0	10,399	64,605	9.0	8,352	11.11%	13.86%
398	521980	GENERAL MISCELLANEOUS EQUIP	70,097	0%	0	40,000	30,097	15.0	5,280	6.67%	57.06%
	TOTAL		91,959,381		-10,513,832	35,887,610	66,585,602		3,844,394		
COMMON											
303	581014	INTG MISC COMPUTR SOFTWARE	84,862,519	0%	0	27,461,947	57,400,573	5.0	9,934,569	20.00%	32.36%
391	581921	GENERAL OFFICE FURN & EQUIP	21,758,958	5%	1,087,948	5,000,209	15,670,801	18.0	1,142,417	5.28%	24.19%
391.1	581922	GENERAL INFO SYS COMPUTERS	49,274,162	0%	0	34,325,663	14,948,499	4.0	8,788,126	25.00%	69.66%
391.1	581920	GENERAL INFO SYS-MAIN FRAME	29,508,892	0%	0	25,276,761	4,232,131	4.0	2,108,190	25.00%	85.66%
392	581924	GENERAL TRANSP EQ GRP 2-3	262,394	10%	26,239	198,650	37,505	10.0	11,496	9.00%	84.12%
392	581926	GENERAL TRANSP EQ GRP 4-8	35,125	5%	1,756	26,941	6,427	12.0	2,784	7.92%	80.74%
393	581927	GENERAL STORES EQUIPMENT	942,196	5%	47,110	534,105	360,982	20.0	43,409	4.75%	59.67%
394	581929	GENERAL TOOLS & SHOP EQUIPMENT	4,262,988	0%	0	2,365,075	1,897,913	15.0	454,101	6.67%	55.48%
395	581935	GENERAL LABORATORY EQUIPMENT	35,983	0%	0	23,013	12,970	10.0	3,588	10.00%	63.96%
396	581941	GENERAL POWER OPERATED EQUIP	11,414	10%	1,141	6,934	3,339	10.0	462	9.00%	67.50%
397	581943	GENERAL COMMUNICATIONS EQUIP	15,681,946	0%	0	6,330,886	9,351,059	9.0	1,655,113	11.11%	40.37%
397	581950	GENERAL COMMUNICATIONS EQUIP	8,097,272	0%	0	4,604,831	3,492,441	9.0	550,954	11.11%	56.87%
398	581991	GENERAL MISCELLANEOUS EQUIP	914,979	0%	0	480,641	434,338	15.0	52,914	6.67%	52.53%
	TOTAL		215,648,829		1,164,195	106,635,655	107,848,979		24,748,123		
		VINTAGE GROUP TOTALS	808,947,315		19,433,397	313,065,052	476,448,866		51,872,717		

NORTHERN STATES POWER COMPANY
2000 SUMMARY OF ANNUAL DEPRECIATION ACCRUALS

SCHEDULE H

UTILITY TOTALS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING PLANT BALANCE	EST. FUTURE NET SALVAGE %	EST. FUTURE NET SALVAGE AMOUNT	BEGINNING DEPRECIATION RESERVE	NET BALANCE	DEPR LIFE (YRS)	ANNUAL ACCRUAL	DEPR RATE	RESERVE RATIO
ELECTRIC											
303	511014	INTG MISC COMPUTR SOFTWARE	5,689,075	0%	0	3,066,685	2,622,390	5.0	582,965	20.00%	53.90%
368	511631	DISTRIBUTION LINE TRANSFORMERS	270,872,948	10%	27,087,295	84,734,444	159,051,209	35.0	7,128,021	2.57%	34.76%
368	511633	DISTRIBUTION LINE CAPACITORS	15,485,417	0%	0	5,919,311	9,566,106	25.0	631,960	4.00%	38.23%
370	511651	DISTRIBUTION METERS	94,768,793	0%	0	6,612,203	88,156,590	25.0	3,832,947	4.00%	6.98%
391	511925	GENERAL OFFICE FURN & EQUIP	4,729,693	5%	236,485	2,102,059	2,391,149	18.0	255,982	5.28%	46.78%
391.1	511926	GENERAL INFO SYS COMPUTERS	20,102,024	0%	0	11,497,920	8,604,105	4.0	4,031,732	25.00%	57.20%
392	511928	GENERAL TRANSP EQ GRP 2-3	424,718	10%	42,472	-114,513	496,759	10.0	37,038	9.00%	-29.96%
392	511929	GENERAL TRANSP EQ TRAILERS	1,170,705	10%	117,070	795,894	257,740	10.0	98,799	9.00%	75.54%
392	511931	GENERAL TRANSP EQ GRP 4-8	11,868,221	5%	594,411	9,494,027	1,799,783	12.0	692,318	7.92%	84.06%
393	511930	GENERAL STORES EQUIPMENT	1,995,818	5%	99,791	1,036,611	859,416	20.0	84,929	4.75%	54.67%
394	511944	GENERAL TOOLS & SHOP EQUIPMENT	28,302,763	0%	0	11,674,406	16,628,357	15.0	1,936,415	6.67%	41.25%
395	511950	GENERAL LABORATORY EQUIPMENT	8,171,465	0%	0	4,727,110	3,444,355	10.0	795,755	10.00%	57.85%
396	511963	GENERAL POWER OPERATED EQUIP	1,761,369	10%	176,137	1,216,375	368,857	10.0	143,288	9.00%	76.73%
397	511970	GENERAL COMMUNICATIONS EQUIP	9,838,538	0%	0	6,830,319	3,008,219	9.0	836,661	11.11%	69.42%
397	511972	GENERAL COMMUNICATIONS EQUIP	1,482,916	0%	0	774,755	708,160	9.0	147,533	11.11%	52.25%
397	511976	GENERAL COMMUNICATE EQUIP-EMS	18,279,162	0%	0	4,376,527	13,902,635	9.0	2,027,334	11.11%	23.94%
398	511980	GENERAL MISCELLANEOUS EQUIP	496,954	0%	0	393,308	103,646	15.0	13,622	6.67%	79.14%
	TOTAL		495,460,578		28,353,661	155,137,441	311,969,476		23,277,299		
GAS											
303	521014	INTG MISC COMPUTR SOFTWARE	1,375,733	0%	0	99,424	1,276,309	5.0	322,107	20.00%	7.23%
381	521615	DISTRIBUTION METERS	69,370,952	-15%	-10,405,643	23,765,730	56,010,864	35.0	2,334,997	3.29%	29.79%
381	521617	DISTRIBUTION METERS-TELEMETER	601,146	0%	0	274,230	326,916	8.0	75,807	12.50%	45.62%
383	521619	DISTRIBUTION HOUSE REGULATORS	11,068,603	-10%	-1,106,860	4,379,265	7,796,198	45.0	270,152	2.44%	35.97%
391	521921	GENERAL OFFICE FURN & EQUIP	31,074	5%	1,554	2,147	27,373	18.0	1,641	5.28%	7.27%
391.1	521926	GENERAL INFO SYS COMPUTERS	1,922,457	0%	0	613,222	1,309,235	4.0	468,528	25.00%	31.90%
392	521928	GENERAL TRANSP EQ GRP 2-3	81,618	10%	8,162	-66,728	140,184	10.0	7,344	9.00%	-90.84%
392	521929	GENERAL TRANSP EQ TRAILERS	192,824	10%	19,282	101,382	72,160	10.0	16,887	9.00%	58.42%
392	521931	GENERAL TRANSP EQ GRP 4-8	1,102,569	5%	55,128	857,584	189,857	12.0	72,615	7.92%	81.87%
394	521942	GENERAL TOOLS & SHOP EQUIPMENT	5,066,913	0%	0	2,115,638	2,951,275	15.0	354,303	6.67%	41.75%
395	521950	GENERAL LABORATORY EQUIPMENT	55,423	0%	0	27,346	28,076	10.0	5,556	10.00%	49.34%
396	521963	GENERAL POWER OPERATED EQUIP	667,393	10%	66,739	468,073	132,580	10.0	55,446	9.00%	77.93%
397	521970	GENERAL COMMUNICATIONS EQUIP	2,124,925	0%	0	997,093	1,127,832	9.0	246,929	11.11%	46.92%
397	521972	GENERAL COMMUNICATIONS EQUIP	80,343	0%	0	18,751	61,591	9.0	8,960	11.11%	23.34%
398	521980	GENERAL MISCELLANEOUS EQUIP	87,367	0%	0	45,280	42,087	15.0	6,457	6.67%	51.83%
	TOTAL		93,829,339		-11,361,637	33,698,437	71,492,539		4,247,729		
COMMON											
303	581014	INTG MISC COMPUTR SOFTWARE	107,329,711	0%	0	37,396,516	69,933,194	5.0	11,685,244	20.00%	34.84%
391	581921	GENERAL OFFICE FURN & EQUIP	22,173,503	5%	1,108,675	5,067,103	15,997,725	18.0	1,231,913	5.28%	24.05%
391.1	581922	GENERAL INFO SYS COMPUTERS	39,151,294	0%	0	26,388,077	12,763,217	4.0	6,268,965	25.00%	67.40%
391.1	581920	GENERAL INFO SYS-MAIN FRAME	30,340,289	0%	0	27,384,951	2,955,339	4.0	1,590,020	25.00%	90.26%
392	581924	GENERAL TRANSP EQ GRP 2-3	108,012	10%	10,801	63,875	33,336	10.0	9,732	9.00%	65.71%
392	581926	GENERAL TRANSP EQ GRP 4-8	35,125	5%	1,756	29,725	3,643	12.0	493	7.92%	89.08%
393	581927	GENERAL STORES EQUIPMENT	942,196	5%	47,110	577,514	317,573	20.0	42,517	4.75%	64.52%
394	581929	GENERAL TOOLS & SHOP EQUIPMENT	4,370,890	0%	0	2,821,401	1,549,489	15.0	437,995	6.67%	64.55%
395	581935	GENERAL LABORATORY EQUIPMENT	35,983	0%	0	26,601	9,382	10.0	3,588	10.00%	73.93%
396	581941	GENERAL POWER OPERATED EQUIP	4,968	10%	497	950	3,521	10.0	444	9.00%	21.25%
397	581943	GENERAL COMMUNICATIONS EQUIP	15,913,033	0%	0	7,985,999	7,927,034	9.0	1,716,399	11.11%	50.19%
397	581950	GENERAL COMMUNICATIONS EQUIP	8,195,153	0%	0	5,155,785	3,039,369	9.0	558,746	11.11%	62.91%
398	581991	GENERAL MISCELLANEOUS EQUIP	958,660	0%	0	533,555	425,105	15.0	51,475	6.67%	55.66%
	TOTAL		229,558,818		1,168,839	113,432,052	114,957,927		23,597,531		
		VINTAGE GROUP TOTALS	818,848,735		18,160,862	302,267,931	498,419,942		51,122,559		

NORTHERN STATES POWER COMPANY
2001 SUMMARY OF ANNUAL DEPRECIATION ACCRUALS

SCHEDULE H

UTILITY TOTALS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING PLANT BALANCE	EST. FUTURE NET SALVAGE %	EST. FUTURE NET SALVAGE AMOUNT	BEGINNING DEPRECIATION RESERVE	NET BALANCE	DEPR LIFE (YRS)	ANNUAL ACCRUAL	DEPR RATE	RESERVE RATIO
ELECTRIC											
303	10303004	INTG MISC COMPUTR SOFTWARE	5,165,248	0%	0	3,590,338	1,574,910	5.0	434,647	20.00%	69.51%
368	10368000	DISTRIBUTION LINE TRANSFORMERS	282,764,115	10%	28,276,411	89,294,337	165,193,367	35.0	6,936,319	2.57%	35.09%
368	10368010	DISTRIBUTION LINE CAPACITORS	16,119,740	0%	0	6,392,572	9,727,168	25.0	650,436	4.00%	39.66%
370	10370000	DISTRIBUTION METERS	97,735,758	0%	0	516,127	97,219,632	25.0	4,065,262	4.00%	0.53%
391	10391000	GENERAL OFFICE FURN & EQUIP	5,037,997	5%	251,900	2,359,291	2,426,806	18.0	290,896	5.28%	49.29%
391.1	10391004	GENERAL INFO SYS COMPUTERS	23,451,645	0%	0	15,530,802	7,920,843	4.0	3,929,448	25.00%	66.22%
392	10392020	GENERAL TRANSP EQ GRP 2-3	424,718	10%	42,472	15,644	366,602	10.0	38,145	9.00%	4.09%
392	10392030	GENERAL TRANSP EQ TRAILERS	1,170,705	10%	117,070	834,026	219,608	10.0	77,561	9.00%	79.16%
392	10392040	GENERAL TRANSP EQ GRP 4-8	11,836,276	5%	591,814	10,659,423	585,039	12.0	429,148	7.92%	94.80%
393	10393000	GENERAL STORES EQUIPMENT	1,995,818	5%	99,791	1,121,540	774,487	20.0	83,894	4.75%	59.15%
394	10394000	GENERAL TOOLS & SHOP EQUIPMENT	30,552,387	0%	0	13,610,821	16,941,565	15.0	2,054,262	6.67%	44.55%
395	10395000	GENERAL LABORATORY EQUIPMENT	8,835,479	0%	0	5,522,865	3,312,614	10.0	824,356	10.00%	62.51%
396	10396000	GENERAL POWER OPERATED EQUIP	1,764,702	10%	176,470	1,359,663	228,569	10.0	133,187	9.00%	85.61%
397	10397000	GENERAL COMMUNICATIONS EQUIP	10,560,698	0%	0	7,664,174	2,896,524	9.0	876,888	11.11%	72.57%
397	10397010	GENERAL COMMUNICATIONS EQUIP	2,566,550	0%	0	922,288	1,644,261	9.0	148,423	11.11%	35.93%
397	10397030	GENERAL COMMUNICATE EQUIP-EMS	18,398,283	0%	0	6,403,861	11,994,422	9.0	1,992,110	11.11%	34.81%
398	10398000	GENERAL MISCELLANEOUS EQUIP	563,261	0%	0	406,930	156,332	15.0	23,828	6.67%	72.25%
	TOTAL		518,943,360		29,555,929	166,204,702	323,182,750		22,988,811		
GAS											
303	20303004	INTG MISC COMPUTR SOFTWARE	1,941,295	0%	0	421,531	1,519,764	5.0	273,583	20.00%	21.71%
381	20381000	DISTRIBUTION METERS	73,431,252	-15%	-11,014,688	23,792,937	60,653,003	35.0	2,497,974	3.29%	28.18%
381	20381010	DISTRIBUTION METERS-TELEMETER	639,249	0%	0	350,037	289,212	8.0	79,915	12.50%	54.76%
383	20383000	DISTRIBUTION HOUSE REGULATORS	10,674,182	-10%	-1,067,418	4,254,996	7,486,604	45.0	260,918	2.44%	36.24%
391	20391000	GENERAL OFFICE FURN & EQUIP	32,482	5%	1,624	3,788	27,070	18.0	1,708	5.28%	12.28%
391.1	20391004	GENERAL INFO SYS COMPUTERS	2,297,153	0%	0	1,081,750	1,215,403	4.0	485,491	25.00%	47.09%
392	20392020	GENERAL TRANSP EQ GRP 2-3	81,618	10%	8,162	-50,060	123,516	10.0	8,276	9.00%	-68.15%
392	20392030	GENERAL TRANSP EQ TRAILERS	192,824	10%	19,282	114,888	58,654	10.0	14,411	9.00%	66.20%
392	20392040	GENERAL TRANSP EQ GRP 4-8	1,102,569	5%	55,128	952,869	94,572	12.0	61,284	7.92%	90.97%
394	20394000	GENERAL TOOLS & SHOP EQUIPMENT	5,525,510	0%	0	2,471,006	3,054,504	15.0	376,359	6.67%	44.72%
395	20395000	GENERAL LABORATORY EQUIPMENT	55,423	0%	0	32,902	22,520	10.0	3,472	10.00%	59.37%
396	20396000	GENERAL POWER OPERATED EQUIP	667,393	10%	66,739	523,519	77,134	10.0	38,881	9.00%	87.16%
397	20397000	GENERAL COMMUNICATIONS EQUIP	2,251,212	0%	0	1,244,022	1,007,190	9.0	255,523	11.11%	55.26%
397	20397010	GENERAL COMMUNICATIONS EQUIP	82,489	0%	0	27,711	54,778	9.0	9,174	11.11%	33.59%
398	20398000	GENERAL MISCELLANEOUS EQUIP	102,602	0%	0	51,737	50,865	15.0	5,546	6.67%	50.43%
	TOTAL		99,077,253		-11,931,170	35,273,633	75,734,789		4,372,516		
COMMON											
303	40303004	INTG MISC COMPUTR SOFTWARE	112,615,226	0%	0	49,081,760	63,533,466	5.0	13,350,153	20.00%	43.58%
391	40391000	GENERAL OFFICE FURN & EQUIP	25,147,492	5%	1,257,375	6,265,054	17,625,064	18.0	1,375,465	5.28%	26.22%
391.1	40391004	GENERAL INFO SYS COMPUTERS	42,522,004	0%	0	32,634,307	9,887,696	4.0	5,291,103	25.00%	76.75%
391.1	40391010	GENERAL INFO SYS-MAIN FRAME	30,349,450	0%	0	28,974,971	1,374,479	4.0	1,000,297	25.00%	95.47%
392	40392020	GENERAL TRANSP EQ GRP 2-3	108,012	10%	10,801	70,457	26,754	10.0	9,727	9.00%	72.48%
392	40392040	GENERAL TRANSP EQ GRP 4-8	35,125	5%	1,756	33,368	0	12.0	0	7.92%	100.00%
393	40393000	GENERAL STORES EQUIPMENT	942,196	5%	47,110	620,031	275,056	20.0	42,087	4.75%	69.27%
394	40394000	GENERAL TOOLS & SHOP EQUIPMENT	4,434,362	0%	0	3,259,396	1,174,967	15.0	198,627	6.67%	73.50%
395	40395000	GENERAL LABORATORY EQUIPMENT	35,983	0%	0	30,189	5,794	10.0	3,084	10.00%	83.90%
396	40396000	GENERAL POWER OPERATED EQUIP	4,968	10%	497	1,394	3,077	10.0	445	9.00%	31.18%
397	40397000	GENERAL COMMUNICATIONS EQUIP	16,955,993	0%	0	9,702,398	7,253,595	9.0	1,789,381	11.11%	57.22%
397	40397010	GENERAL COMMUNICATIONS EQUIP	10,586,779	0%	0	5,714,531	4,872,249	9.0	822,799	11.11%	53.98%
398	40398000	GENERAL MISCELLANEOUS EQUIP	961,630	0%	0	585,030	376,600	15.0	55,054	6.67%	60.84%
	TOTAL		244,699,221		1,317,539	136,972,887	106,408,796		23,938,222		
		VINTAGE GROUP TOTALS	862,719,854		18,942,297	338,451,222	505,326,335		51,299,549		

NORTHERN STATES POWER COMPANY
2002 SUMMARY OF ANNUAL DEPRECIATION ACCRUALS

SCHEDULE H

UTILITY TOTALS

FERC ACCT	NSP ACCT	ACCOUNT DESCRIPTION	BEGINNING PLANT BALANCE	EST. FUTURE NET SALVAGE %	EST. FUTURE NET SALVAGE AMOUNT	BEGINNING DEPRECIATION RESERVE	NET BALANCE	DEPR LIFE (YRS)	ANNUAL ACCRUAL	DEPR RATE	RESERVE RATIO
ELECTRIC											
303	10303004	INTG MISC COMPUTR SOFTWARE	5,165,248	0%	0	4,024,985	1,140,263	5.0	414,356	20.00%	77.92%
368	10368000	DISTRIBUTION LINE TRANSFORMERS	274,685,394	10%	27,468,539	78,714,822	168,502,033	35.0	7,117,425	2.57%	31.84%
368	10368010	DISTRIBUTION LINE CAPACITORS	16,366,806	0%	0	6,926,430	9,440,375	25.0	663,218	4.00%	42.32%
370	10370000	DISTRIBUTION METERS	105,060,119	0%	0	147,235	104,912,883	25.0	4,214,167	4.00%	0.14%
391	10391000	GENERAL OFFICE FURN & EQUIP	5,881,205	5%	294,060	2,650,188	2,936,957	18.0	319,522	5.28%	47.43%
391.1	10391004	GENERAL INFO SYS COMPUTERS	27,097,294	0%	0	19,460,250	7,637,045	4.0	3,619,966	25.00%	71.82%
392	10392020	GENERAL TRANSP EQ GRP 2-3	424,718	10%	42,472	53,789	328,457	10.0	38,225	9.00%	14.07%
392	10392030	GENERAL TRANSP EQ TRAILERS	1,170,705	10%	117,070	911,587	142,047	10.0	71,717	9.00%	86.52%
392	10392040	GENERAL TRANSP EQ GRP 4-8	11,836,276	5%	591,814	11,105,503	138,959	12.0	391,818	7.92%	98.76%
393	10393000	GENERAL STORES EQUIPMENT	1,995,818	5%	99,791	1,205,434	690,593	20.0	82,336	4.75%	63.58%
394	10394000	GENERAL TOOLS & SHOP EQUIPMENT	31,621,713	0%	0	15,665,083	15,956,630	15.0	2,057,871	6.67%	49.54%
395	10395000	GENERAL LABORATORY EQUIPMENT	9,683,795	0%	0	6,347,221	3,336,574	10.0	777,143	10.00%	65.54%
396	10396000	GENERAL POWER OPERATED EQUIP	1,764,702	10%	176,470	1,492,850	95,382	10.0	105,791	9.00%	93.99%
397	10397000	GENERAL COMMUNICATIONS EQUIP	10,759,157	0%	0	8,537,726	2,221,430	9.0	781,335	11.11%	79.35%
397	10397010	GENERAL COMMUNICATIONS EQUIP	1,598,097	0%	0	1,045,982	552,115	9.0	123,217	11.11%	65.45%
397	10397030	GENERAL COMMUNICATE EQUIP-EMS	18,398,283	0%	0	8,395,971	10,002,312	9.0	1,916,069	11.11%	45.63%
398	10398000	GENERAL MISCELLANEOUS EQUIP	735,244	0%	0	430,757	304,487	15.0	31,865	6.67%	58.59%
	TOTAL		524,244,574		28,790,217	167,115,814	328,338,543		22,726,039		
GAS											
303	20303004	INTG MISC COMPUTR SOFTWARE	1,331,536	0%	0	695,114	636,422	5.0	271,579	20.00%	52.20%
381	20381000	DISTRIBUTION METERS	80,929,571	-15%	-12,139,436	24,835,100	68,233,907	35.0	2,687,065	3.29%	26.68%
381	20381010	DISTRIBUTION METERS-TELEMETER	639,249	0%	0	429,952	209,297	8.0	79,909	12.50%	67.26%
383	20383000	DISTRIBUTION HOUSE REGULATORS	10,674,182	-10%	-1,067,418	4,515,913	7,225,687	45.0	260,920	2.44%	38.46%
391	20391000	GENERAL OFFICE FURN & EQUIP	32,482	5%	1,624	5,496	25,361	18.0	1,716	5.28%	17.81%
391.1	20391004	GENERAL INFO SYS COMPUTERS	2,318,598	0%	0	1,582,326	736,271	4.0	460,692	25.00%	68.24%
392	20392020	GENERAL TRANSP EQ GRP 2-3	106,451	10%	10,645	-18,452	114,257	10.0	9,580	9.00%	-19.26%
392	20392030	GENERAL TRANSP EQ TRAILERS	192,824	10%	19,282	129,299	44,242	10.0	11,870	9.00%	74.51%
392	20392040	GENERAL TRANSP EQ GRP 4-8	1,102,569	5%	55,128	1,014,153	33,288	12.0	64,274	7.92%	96.82%
394	20394000	GENERAL TOOLS & SHOP EQUIPMENT	5,872,892	0%	0	2,881,251	2,991,642	15.0	389,582	6.67%	49.06%
395	20395000	GENERAL LABORATORY EQUIPMENT	55,423	0%	0	36,374	19,048	10.0	554	10.00%	65.63%
396	20396000	GENERAL POWER OPERATED EQUIP	733,768	10%	73,377	620,223	40,168	10.0	18,689	9.00%	93.92%
397	20397000	GENERAL COMMUNICATIONS EQUIP	2,468,506	0%	0	1,510,817	957,689	9.0	274,413	11.11%	61.20%
397	20397010	GENERAL COMMUNICATIONS EQUIP	82,489	0%	0	36,885	45,604	9.0	9,165	11.11%	44.71%
398	20398000	GENERAL MISCELLANEOUS EQUIP	102,602	0%	0	57,284	45,318	15.0	4,723	6.67%	55.83%
	TOTAL		106,643,141		-13,046,797	38,331,737	81,358,201		4,544,732		
COMMON											
303	40303004	INTG MISC COMPUTR SOFTWARE	113,246,443	0%	0	62,431,914	50,814,529	5.0	16,388,361	20.00%	55.13%
391	40391000	GENERAL OFFICE FURN & EQUIP	26,253,420	5%	1,312,671	7,640,519	17,300,230	18.0	1,393,003	5.28%	30.63%
391.1	40391004	GENERAL INFO SYS COMPUTERS	62,940,415	0%	0	37,919,606	25,020,809	4.0	9,560,867	25.00%	60.25%
391.1	40391010	GENERAL INFO SYS-MAIN FRAME	30,349,548	0%	0	29,975,268	374,280	4.0	379,945	25.00%	98.77%
392	40392020	GENERAL TRANSP EQ GRP 2-3	108,012	10%	10,801	80,184	17,027	10.0	9,382	9.00%	82.48%
392	40392040	GENERAL TRANSP EQ GRP 4-8	35,125	5%	1,756	33,368	0	12.0		7.92%	100.00%
393	40393000	GENERAL STORES EQUIPMENT	942,196	5%	47,110	662,118	232,969	20.0	39,962	4.75%	73.97%
394	40394000	GENERAL TOOLS & SHOP EQUIPMENT	4,441,413	0%	0	3,458,023	983,390	15.0	185,717	6.67%	77.86%
395	40395000	GENERAL LABORATORY EQUIPMENT	35,983	0%	0	33,273	2,710	10.0	1,170	10.00%	92.47%
396	40396000	GENERAL POWER OPERATED EQUIP	4,968	10%	497	1,839	2,632	10.0	447	9.00%	41.14%
397	40397000	GENERAL COMMUNICATIONS EQUIP	17,030,076	0%	0	11,491,779	5,538,297	9.0	1,757,193	11.11%	67.48%
397	40397010	GENERAL COMMUNICATIONS EQUIP	11,752,255	0%	0	6,537,330	5,214,925	9.0	842,833	11.11%	55.63%
398	40398000	GENERAL MISCELLANEOUS EQUIP	1,140,381	0%	0	640,084	500,297	15.0	63,208	6.67%	56.13%
	TOTAL		268,280,235		1,372,835	160,905,304	106,002,096		30,622,089		
		VINTAGE GROUP TOTALS	899,167,950		17,116,255	366,352,855	515,698,840		57,892,861		

414 Nicollet Mall
Minneapolis, Minnesota 55401-1993

February 19, 2008

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

RE: PETITION
2008 ANNUAL REVIEW OF REMAINING LIVES
DOCKET NO. E,G002/D-08-___

Dear Dr. Haar:

Pursuant to Minn. Stat. § 216B.17, subd. 3, Northern States Power Company, a Minnesota corporation is eFiling its petition for approval of the *2008 Review of Remaining Lives* and supporting materials to the Minnesota Public Utilities Commission and the Department of Commerce. This filing is submitted to satisfy the review of depreciation rates for electric and natural gas production facilities in accordance with MPUC Docket No. E002/D-77-1086A, Minn. Stat.§216B.11, and Minnesota Rules 7825.0500 through 7825.0900.

Two copies of this submittal have been served on the Office of the Attorney General – Residential Utilities Division. A summary of the filing has been served on all parties on the attached service list. Please contact Lisa H. Perkett, Director, Capital Asset Accounting, at 612-330-6950 if there are any questions regarding this filing.

Sincerely,

Teresa S. Madden
Vice President and Controller

Enclosures

c: Service List

State of Minnesota
Before the
Minnesota Public Utilities Commission

LeRoy Koppendrayer	Chair
David Boyd	Commissioner
J. Dennis O'Brien	Commissioner
Thomas Pugh	Commissioner
Phyllis Reha	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY, A MINNESOTA CORPORATION FOR APPROVAL OF THE CERTIFICATION OF OUR 2008 REVIEW OF REMAINING LIVES

DOCKET NO. E,G002/D-08-___

PETITION

INTRODUCTION

Pursuant to Minnesota Statute §216B.11 and Minnesota Rules 7825.0500 and 7825.0900, Northern States Power Company ("Xcel Energy" or the "Company"), a Minnesota corporation petitions the Minnesota Public Utilities Commission (the "Commission") for an order approving our proposed *2008 Review of Remaining Lives.* We ask that the new remaining lives be effective January 1, 2008, upon Commission approval of this Petition.

The current asset lives were approved by the Commission in the 2007 annual review of remaining lives (Docket No. E, G002/D-07-251) effective January 1, 2007. This filing is for our 2008 annual review of electric and gas production and gas storage assets lives and net salvage rates. We include an estimated in-service of May 2008 for the High Bridge other production plant pursuant to the Metropolitan Emissions Reduction Project ("MERP"), an estimated in-service date of November 2008 for our Grand Meadow Wind Farm, and minor life changes within Steam and Other Production Plant, along with Gas Production and Storage facilities. The overall recommendation, excluding the High Bridge MERP and our proposed Grand Meadow wind facility, is a *decrease* of $7.4 million, total company, mostly generated by the Sherburne County Generating Plant ("Sherco").

I. Summary of Filing

A one-paragraph summary of the filing accompanies this petition pursuant to Minn. R. 7829.1300, subpt. 1.

II. Service on Other Parties

Pursuant to Minn. Stat. § 216B.17, subd.3, we have eFiled this Petition and supporting materials to the Commission and the Department of Commerce. Two copies have also been provided to the Office of the Attorney General – Residential Utilities Division. A brief summary of the filing and the Petition, without supporting materials, have been provided to all persons on the Xcel Energy electric and gas service lists for depreciation filings.

III. General Filing Information

Pursuant to Minnesota Rules 7825.3200, 7825.3500, and 7829.1300, subpt. 3. Xcel Energy provides the following required information:

A. Name, Address, and Telephone Number of Utility

Northern States Power Company
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Megan J. Hertzler
Assistant General Counsel
Xcel Energy Services Inc.
414 Nicollet Mall, 5th Floor
Minneapolis, MN 55401
(612) 215-4589

C. Date of Filing and Date Proposed Rates Will Take Effect

This Petition is being filed February 19, 2008. Xcel Energy requests that, upon Commission approval, the proposed remaining lives be effective beginning January 1, 2008. With respect to the remaining life for the High Bridge plant we request that an effective date for the life change coincide with the month the new plant is placed in-service. The plant in-service date is anticipated to be on or about May 1, 2008. Also,

the Company requests that an effective date for the remaining life for the Grand Meadow Wind Farm coincide with the month the investment is placed in-service, which is anticipated to be on or about November 1, 2008.

D. Statute Controlling Schedule for Processing the Filing

Under Minn. R. 7829.0100, subpt. 11, this request for approval of remaining lives is a "miscellaneous" filing because no determination of the Xcel Energy general revenue requirements is necessary. Comments on a miscellaneous filing are due within 30 days of filing, with replies due 10 days thereafter.

E. Utility Employee Responsible for the Filing

Lisa H. Perkett
Director, Capital Asset Accounting
Xcel Energy Services Inc.
414 Nicollet Mall, 4th Floor
Minneapolis, MN 55401
(612) 330-6950

IV. Review of Remaining Lives

A. Background

Xcel Energy Services personnel have reviewed the remaining lives as of January 1, 2008 for Xcel Energy electric and natural gas production and gas storage facilities and found all of the current remaining lives to be appropriate, except those specifically discussed below. This review evaluated system demand, availability of fuel supplies, operating and maintenance costs, and future technological advancements that influence the decision about retiring electric and natural gas facilities. As detailed in this petition, Xcel Energy recommends that the current remaining lives for all electric and natural gas production and gas storage facilities be adjusted only for the passage of time, with the exception of certain specific facilities discussed below.

The present certified remaining lives became effective for electric and natural gas production and gas storage facilities on January 1, 2007, as approved by the Commission in Docket No. E,G002/D-07-251. Xcel Energy has reviewed the remaining lives and salvage rates of the facilities and, based on changes that have occurred, proposes the changes to depreciation expense, as described in the remainder of this Petition. A summary of all the requested remaining lives is shown in Schedule A, *Summary of Proposed Remaining Lives.*

B. Passage of Time Adjustment

The "passage of time" adjustment does not cause a change in the depreciation accrual. The adjustment merely reflects that Xcel Energy production facilities have aged one year since January 1, 2007. To begin an analysis of 2008 lives, a one-year passage of time adjustment is made to the certified remaining lives of all relevant facilities. Subtracting one year from the present certified remaining life results in the proposed remaining life at January 1, 2008 prior to the additional adjustments that follow. The certified remaining lives at January 1, 2007, along with the current and proposed unadjusted remaining lives at January 1, 2008, are shown in Schedule B, *Comparison of Present and Proposed Lives.*

C. Change in Remaining Life

1. Electric Utility

For electric facilities, Xcel Energy proposes adjustments to the remaining life of the following: Sherco, the High Bridge Combined Cycle Project, Grand Meadow Wind Farm, Blue Lake, Granite City, and Key City. Additionally, the High Bridge steam production plant was removed from service and fully depreciated in 2007. The West Faribault other production plant also was removed from service after becoming fully depreciated in 2006. In addition, the sale of two diesel generators to United Healthcare Services Inc. is briefly discussed. Finally, the Monticello nuclear and St. Anthony Falls hydro facilities are discussed due to an additional plant account being added to this filing consistent with the license extensions being in-serviced in the last year. The remaining life for these last two facilities is not recommended for any change other than the passage of time. Pursuant to Minn. R. 7825.0700, subpt. 1, the following three schedules have been included in this filing: ***2007 Plant In-service (Schedule C)***, ***2007 Analysis of Depreciation Reserve (Schedule D)***, and ***2007 Summary of Annual Depreciation Accruals (Schedule E)***.

a) Steam Production: *High Bridge MERP*

The High Bridge steam plant located on the Mississippi River near downtown St. Paul, Minnesota was taken out of commercial service in August 2007. The plant and reserve balances resulting from the completion of the High Bridge steam production portion of the overall MERP project as of January 1, 2008, are shown with the steam production assets in the Schedule B, *Comparison of Present and Proposed Lives.* The new investment and its depreciation expense for the last eight months of 2008 are shown later under Other Production: High Bridge MERP.

b) Steam Production: *Sherco Units 1,2, and 3*

The Sherco Plant is a three-unit coal-fired base load plant located in Becker, Minnesota. Units 1 and 2 began operation in 1976 and 1977, respectively, generating a net 700 megawatts ("MW") each. Unit 3 began operation in 1987 generating a net 855 MW and is jointly owned with Southern Minnesota Municipal Power Association. Although attached by a common wall to Sherco Units 1 and 2, Unit 3 operates as a separate generating plant with its own depreciable life.

Our 2007 Resource Plan, Docket No. E002/RP-07-1572, describes our commitment to improving the efficiency of our electricity generating fleet to maximize the value of existing generating assets through the planning period. An example of this commitment is our proposal to upgrade Sherco's generating capacity by 80 MW concurrent with environmental upgrades that will result in a significant reduction in overall sulfur dioxide, oxides of nitrogen, particulate matter and mercury emissions from the facility. The Company's planned major construction projects and several more major replacement and repair projects over the next few years will likely result in a request for a significant change in the remaining life of all three Sherco units in approximately 2013.

As of January 1, 2008, the remaining life of Units 1 and 2 is 12 years. The life was last adjusted by 5 years as a part of the 2005 Remaining Life filing, Docket No. E,G002/D-05-288. The remaining life of Unit 3 is 12.8 years as of January 1, 2008, and has only been adjusted for the passage of time since the 1987 in-service date. Since the last life adjustment for Sherco, a majority of the major capital improvements consisted of pollution control projects, as well as the completion of many smaller projects. Xcel Energy requests that the remaining life for Sherco Units 1 and 2 be lengthened by 3 years, from the current 12 years to 15 years. This change in remaining life produces a *decrease* to annual expense of $3.2 million for these two units. The Company also requests the remaining life for Sherco Unit 3 be lengthened by 2.2 years, from the current 12.8 years to 15 years. This change in remaining life produces a *decrease* to annual expense of $3.1 million for this unit. The total adjustment for all three Sherco units is $6.3 million.

The requested minor adjustment of the remaining life for Sherco Units 1 and 2 of 3 years and Unit 3 by 2.2 years at this time will result in all three of the units having a 10 year remaining life at the end of 2012. This intermediate life helps to insure that the current generating assets of this essential base load facility do not become financially over recovered through the use of too rapid of a depreciation schedule. This change is also consistent with our 2007 Resource Plan planning period.

c) Nuclear Production: *Monticello Relicensing*

As a part of the Monticello nuclear plant life extension approval, recovery of the operating license renewal costs are accounted for under Federal Energy Regulatory Commission ("FERC") 302 - Franchises and Consents. The costs of the life extension process, including both license renewal fees paid to the Nuclear Regulatory Commission along with related expenses incurred during the re-licensing process, are all included in this account. Xcel Energy is currently using the end-of-life date of September 2030 and is here informing the Commission of the use of this FERC account for the Monticello nuclear plant license renewal.

d) Hydro Production: *Saint Anthony Falls Hydroelectric Relicensing*

The final license extension of 30 years for the dams associated with the Saint Anthony Falls Hydroelectric Project was issued by FERC in March 2004. With the re-licensing process finally completed, the recovery of these license extension costs are recorded under FERC 302 - Franchises and Consents. The costs included in this account consist of the re-licensing amounts paid to FERC to obtain the new license, along with related expenses during the re-licensing process. Xcel Energy is currently using the end-of-life date of March 2034 and is also here informing the Commission of the use of this FERC account for Hennepin Island, under the Saint Anthony Falls Hydroelectric Project license extension.

e) Other Production: *High Bridge MERP*

The new High Bridge Other Production plant is located on the Mississippi River near downtown St. Paul, Minnesota. The High Bridge Combined Cycle Project calls for a natural gas fired combined-cycle arrangement with two combustion turbines, corresponding heat recovery steam system generators, and a new steam turbine to be installed in a new structure located at the southwest corner of the existing site. This new facility will use the existing circulating water supply and return from the river. The new High Bridge plant system generation capability will be 624 MW.

The new facility will include appropriate air pollution control equipment pursuant to the MERP project. The estimated in-service date for this new plant is May 1, 2008. The 30-year expected life for this newly built production facility is consistent with the Settlement in Docket No. E002/M-02-633. Xcel Energy proposes a remaining life of 30 years on investment at the High Bridge plant effective with the in-service month of this new Other Production plant.

The corresponding change in depreciation expense will become part of the MERP Environmental Improvement Rider ("EIR") rate calculation. The estimated impact

on the annual depreciation accruals for the High Bridge MERP investment is an *increase* of approximately $8.5 million, total company. The increase in depreciation expense assumes the new MERP investment is in-service on or about May 1, 2008. This increase in depreciation for Minnesota jurisdiction is recovered from Minnesota electric retail customers as part of the MERP EIR rate rider. The depreciation adjustments are shown separately in the Schedule B, *Comparison of Present and Proposed Lives.* The existing investment, which became fully depreciated in 2007, is shown with steam production.

f) Other Production*: Grand Meadow Wind Farm*

The Grand Meadow Wind Farm is an approximately 100 MW large energy facility comprised of 67 General Electric 1.5 MW wind turbines mounted on freestanding 262.5 feet high tubular steel towers supported by cast-in-place concrete foundations. The rotor diameter is 252.6 feet, resulting in an overall height of 388.8 feet when one blade is in the vertical position. The equipment at each tower also includes pad mount transformers. This filing discusses only the other production costs and does not include any transmission assets associated with the wind farm.

The Certificate of Need ("CON") for this 100 MW wind farm was filed and approved under Commission Docket No. E002/CN-07-873. This wind farm is expected to become operational in November 2008. The expected useful life of this facility is 25 years. Xcel Energy proposes the life of this new wind resource be set at 25 years effective with the in-service date on or about November 1, 2008. Should the new investment be placed in-service earlier or later than November 2008, the Company will align the start of the new remaining life with the in-service month.

Upon completion of the Wind Farm, the total construction cost will be priced to all pertinent FERC accounts within other production. Although there is no expectation currently of how the asset pricing will be allocated to the relevant FERC accounts, there may be some costs assigned to wind rights in Account 340.1. We expect to know more in regards to whether any of the construction costs would be assigned to wind rights by the next remaining life filing. Xcel Energy requests that all assets, even the rights, be recovered over the 25 years.

The estimated impact on the 2008 depreciation accruals for Grand Meadow Wind Farm new investment is an *increase* of approximately $1.2 million. This increase in depreciation expense assumes the investment is in-service November 2008. The depreciation adjustments resulting from the completion of this new Wind Generation project is shown separately in the Schedule B, *Comparison of Present and Proposed Lives.*

g) Other Production: *Blue Lake Units 1thru 4*

The Blue Lake Peaking Plant is located south of Shakopee, Minnesota, and consists of four 55 MW oil-fired combustion turbines. The plant became operational in 1974. Since the 2004 capital improvements, which included the replacement of vacuum breakers on all four units and the control system replacement, improvements continued in 2006 with a new station auxiliary transformer crosstie between the four units and the new units 7 and 8. The 2007 capital expenditures included the installation of a data acquisition system and fuel flow monitoring equipment. Inspections indicate the units are in good condition. This peaking facility is not used for extended periods of time, which contributes to the overall condition of the equipment. In 2007, the facility was operated for a total of 690 hours.

The remaining life for the original four Blue Lake units is 3 years as of January 1, 2008. While these units are comparatively old, the Company believes that the facility remains a viable asset to continued operations. Due to relative good condition of the units and the low hours of usage, Xcel Energy proposes that the remaining life for these four oil-burning units be lengthened by 2 years, to 5 years. This change in remaining life produces a *decrease* to annual expense of $0.24 million for these units.

h) Other Production*: Granite City*

The Granite City Peaking Plant has four units that generate a total of 61 MW of electricity using natural gas and oil. This plant is located in St. Cloud, Minnesota, and was originally built in 1969. Since the 2004 capital improvements on unit 4 and general inspections, capital improvements have continued with replacing the existing bank of batteries with new along with battery charger and generator breaker replacements on all 4 units. There are no known problems that exist with regard to the units and with the proper levels of maintenance the facility could operate for several years. Currently, the plant is needed for system reliability including the 115kV transmission upgrade in the St. Cloud area. The remaining life for Granite City as of January 1, 2008, is 2 years. The Company proposes to lengthen the remaining life of Granite City to 5 years as of January 1, 2008. This change in remaining life produces a *decrease* to annual expense of $0.26 million for this plant.

i) Other Production*: Key City*

The Key City Peaking Plant is located in Mankato, Minnesota, adjacent to Xcel Energy's Wilmarth power plant. The Key City plant has four units that generate a total of 64 MW of electricity using natural gas and oil as fuel. The plant became operational in 1970. As of January 1, 2008, Key City has a remaining life of 2 years. There have been many capital improvements since late 2000 through 2006 that

include new system controls along with a stack and silencer replacement, hardware and software improvements to allow for the remote operation of Key City from our Wilmarth plant control center, and replacement of the fire protection system for all four combustion turbine units, and the replacement of each unit's circuit switcher to a higher fault rating.

The latest improvements combined with the current level of maintenance, low hours of usage, system commitment and fuel contract at the Wilmarth plant will allow operation of the plant for several more years. Xcel Energy recommends that the remaining life of Key City be lengthened by 3 years to 5 years as of January 1, 2008. This change in remaining life produces a *decrease* to annual expense of $0.17 million for this plant.

j) Other Production*: UnitedHealthcare*

This UnitedHealthcare ("UHC") plant was considered a standby or peaking generation system, consisting of two dispersed diesel generator units at the UHC customer service data center in Golden Valley, Minnesota.

Approval of the sale of these units to UnitedHealthcare Services Inc. occurred in Docket No. E002/PA-07-1298 on February 8, 2008. The proceeds from this sale will be treated as salvage and credited to the reserve for depreciation of the remaining other production facilities, thus preserving the gain for customers by reducing the net book value of electric plant in service. All of the other production plant in FERC account 344 that is not fully depreciated as of January 1, 2008, will receive a reserve credit per the final accounting and journal entries required by the Commission upon closing of this asset sale. Because of the impending final transactions to complete the sale of this facility, the asset has been removed from the depreciation schedules.

2. Gas Utility

For the natural gas facilities, Xcel Energy proposes adjustments to the remaining life of Maplewood, Sibley, and Wescott production plants. Further, an adjustment to the remaining life is being proposed for the Wescott Liquefied Natural Gas ("LNG") storage plant, due to a correlation between the lives of the Wescott production and storage plants.

a) Gas Production*: Maplewood Propane Plant*

The Maplewood Propane Plant located in Maplewood, Minnesota was placed in-service in 1957 with twenty-four 30,000 and nine 90,000-gallon tanks with effective propane storage of 1,355,000 gallons or 123,900 thousand cubic feet ("MCF"). The

effective vaporization capacity is 48,000 MCF a day with two vaporizers. Propane storage at this location must be refilled by truck.

Since the station control system upgrade in 2005, a main electric plant transformer was installed in 2006. Capital improvements continued in 2007 to replace the substation. Inspections of the other major components of the facility indicate the equipment will function beyond the present remaining life with normal maintenance and normal hours of usage. For these reasons, Xcel Energy proposes that the remaining life of 6 years as of January 1, 2008, be lengthened to 8 years. The two-year push out in life will keep the Maplewood propane plant in-line with the Sibley propane plant. This change in remaining life produces a *decrease* to annual expense of $0.03 million for this plant.

b) Gas Production*: Sibley Propane Plant*

The Sibley Plant, located in Mendota Heights, Minnesota is a propane plant used to supplement natural gas supplies during peak demand periods. The plant was placed in service in 1953 with a 1.2 million-gallon storage capacity. The effective vaporization capacity, the amount of liquid propane that can be vaporized and sent into the natural gas distribution system, is 46 million cubic feet per day.

Since 2003 and early 2004 capital improvements have included transformer replacement, upgrades to the facilities wiring and communication cable, upgrade to the truck loading system including electronic transmitter for propane metering along with building station control system. In 2005, improvements continued with instrument air system and valve replacement. More recent improvements in 2007 included relocating a section of the liquid propane pipeline between the Sibley and Wescott plant. The latest inspections indicated that no repairs are required, so with normal maintenance this plant will function several years beyond its current life.

The remaining life of the Sibley Production Plant is three years. Plant personnel suggest that considering the past equipment replacements, upgrades, levels of maintenance, and inspections that the facility will be able to operate for six to eight years with only normal levels of routine maintenance. Xcel Energy proposes that the remaining life of 3 years as of January 1, 2008, be lengthened to 8 years. This change in remaining life produces a *decrease* to annual expense of $0.11 million for this plant.

c) Gas Production*: Wescott Propane Plant*

The Wescott Propane Plant, located in Inver Grove Heights, Minnesota has two storage tanks of 5,850,000 gallons each with a total storage of 1,073,200 MCF and has a pipeline connection to the Sibley Propane Plant. The tanks were put in-service in

1963 and 1972. The propane plant shares its site with the Wescott LNG Plant. Since the propane structures would likely remain until the LNG structures are removed, the life that is used for structures and improvements for both facilities is the same. The general condition of the Wescott Propane Plant is good. Capital investment within the 2003 to 2005 time period included upgrades to the process control system, odorizing system, building and yard improvements, and the plants electrical distribution system. In 2006, a commercial liquid system upgrade included the installation of a tank foundation heating system. Inspections of equipment have been satisfactory, no significant replacement of equipment has become necessary and plant personnel are confident that only ongoing maintenance of this facility will be necessary to support a seven to ten year operational life before any major repairs or replacement of equipment will become necessary. Xcel Energy proposes that the remaining life of 6 years as of January 1, 2008, be lengthened to 10 years. This change in remaining life produces a *decrease* to annual expense of $0.07 million.

d) Gas Storage*: Wescott LNG Plant*

The Wescott LNG Plant is a liquefied natural gas plant placed in-service in 1972. The plant cools then stores the liquefied natural gas in large storage tanks. Vaporizing equipment is used later to warm and convert the liquefied methane back to a gas for use in the distribution system. In past years the remaining life that is used for structures and improvements account for both the Wescott Production Plant and the Wescott LNG Plant has been the same, as these facilities would likely be retired from service simultaneously. The Wescott LNG Plant is unique in that there is separate identifiable systems within the plant that function independently from other systems, thereby allowing for the possibility of having different remaining lives for each system. For that reason the life used for the structure and improvement account does not necessarily need to match the life of other equipment. However, presently all systems have a 6 year remaining life except for the vaporizing equipment having a 20 year life as of January 1, 2008.

Since the 2003 capital improvements included the rebuilding of the liquefaction compressor, an upgrade of the site security system, replacement of the LNG storage pumps, and control room upgrades, the Company has updated the mixed refrigerant loop system, boiloff vapor system, station air system, feed gas system, and cathodic protection for refrigerated LNG tanks. In 2005, a significant addition was made to liquefaction equipment that included a LNG cryogenic heat exchange project with associated equipment added in 2006. More recently, improvements include station controls, fire detection system, rebuilding the truck loading rack and building improvements to the LNG plant.

Based upon ongoing maintenance of the structure, equipment replacements and upgrades, other recent improvements, and inspections on the main components plant personnel believe this facility can operate on normal levels of maintenance for ten to twelve-years. Xcel Energy proposes that the remaining lives of 6 years on the structure and all component systems, except the vaporizing equipment, as of January 1, 2008, be lengthened to 10 years. The life on the vaporizing equipment will remain at 20 years as of January 1, 2008. This change in remaining life produces a *decrease* to annual expense of $0.24 million for this plant.

D. Change in Net Salvage Rates

The salvage rates, as approved by the Commission in the Docket No. E,G002/D-07-251, have been reviewed and are recommended to remain in effect for all electric and natural gas production and gas storage assets, except as discussed below. The next in-depth demolition study is due to be submitted to the Commission with the 2010 remaining life filing. The present and proposed salvage rates are shown in the Schedule B, *Comparison of Present and Proposed Lives (columns 5 and 8, respectively).*

1. Electric Utility

a) Other Production: *High Bridge MERP*

For the High Bridge MERP, a natural gas fired combined-cycle arrangement with two combustion turbines, the Company is requesting a -10% net salvage rate on all FERC accounts of this new other production facility. The initial net salvage rate of –10% will be reviewed in our next demolition study to be filed on or before February 17, 2010. Xcel Energy is requesting this net salvage rate be effective with the in-service date of this new plant estimated to be May 1, 2008. This –10% net salvage rate produces an estimated *increase* to depreciation expense of $0.77 million for just the net salvage component. This increase is part of the $8.5 million depreciation increase referenced earlier in the life analysis section.

b) Other Production: *Grand Meadow Wind Farm*

This facility's initial net salvage rate is -10% to recover the removal of towers, turbines, concrete footings, transformers and other accessory equipment necessary to return the land to usable green space, as the majority of land will be leased for this large wind energy conversion system. Although we cannot currently determine with certainty when or under what conditions the wind generation facilities will be dismantled or demolished for final retirement, the Company must provide sufficient funding for these events.

Net salvage rates for new wind generation projects of this type also will be reviewed in the Company's next demolition study to be filed in 2010. Xcel Energy proposes a -10% net salvage rate effective with the in-service date on or about November 1, 2008. This –10% net salvage rate produces an estimated *increase* to depreciation expense of $0.1 million for just the net salvage component. This increase is part of the $1.2 million 2008 depreciation increase referenced earlier in the life analysis section.

E. Resource Plan

The Commission's Order in Docket No. E,G002/D-07-251 dated September 21, 2007, the 2007 Annual Review of Remaining Lives, requires the Company to submit, as a part of future remaining life studies, a narrative of the differences between the electric generation plant lives presented in the study and the planning periods used in the most recent resource plan, including a schedule that shows the comparison. Specifically requires:

> *Future depreciation studies for production facilities continue to: 1) describe how the service lives proposed relate to the planning periods in the IRP for each electric production facility, and 2) contain a schedule that shows the comparison.*

The 2008 Annual Review of Remaining Lives contains a depreciation schedule showing the estimated remaining life of each generation asset (see Schedule A, *Summary of Proposed Remaining Lives*). The resource planning analysis assumed that most generation assets would be able to meet customer resource needs through the 15-year planning period, and exceptions are specifically discussed in the plan. Planned upgrades of specific electric generation assets were discussed further in our 2007 Resource Plan filing, submitted on December 14, 2007 in Docket E002/RP-07-1572. The main difference between the expected lives in the Resource Plan and this filing relate to several peaking facilities. In the Resource Plan, we discuss and evaluate potential investments that could extend the remaining lives of those facilities through the end of the 15-year planning period. Since the proposed improvements to the plants have not yet been made, it would be inappropriate to update the official remaining lives of those units at this time.

Schedule F, *Resource Plan Comparison,* contains a table listing each electric production plant facility, its proposed depreciation life on current investment, the resource plan capacity planning period, and the rationale for the difference between the depreciation life and the resource plan capacity planning period.

V. Effect of the Change in Rates

This instant petition will not impact rates, the price of Xcel Energy natural gas and electric service, or the terms and conditions of service. Rather, the changes will reflect the way Xcel Energy recognizes the depreciation expenses for the relevant assets in the current year.

VI. Miscellaneous Information

Pursuant to Minn. R. 7829.0700, subpt. 2, Xcel Energy requests that the following persons be placed on the Commission's official service list for this matter:

Megan J. Hertzler
Assistant General Counsel
Xcel Energy
414 Nicollet Mall, 5th Floor
Minneapolis, MN 55401

SaGonna Thompson
Records Specialist
Xcel Energy
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Minneapolis, MN 55401

VII. Proprietary Information

This filing, including all schedules, does not contain any proprietary information.

VIII. Supporting Schedules

The following supporting schedules have been included for filing requirement purposes and for additional support to the recommended changes:

Supporting Schedules

A	Summary of Proposed Remaining Lives
B	Comparison of Present and Proposed Lives
C	2007 Plant In-service
D	2007 Analysis of Depreciation Reserve
E	2007 Summary of Annual Depreciation Accruals
F	Resource Plan Comparison

CONCLUSION

The Xcel Energy *2008 Review of Remaining Lives* proposes that depreciation adjustments be made to the life of the Sherco steam production plant, the Blue Lake, Granite City and Key City other production plants, the Maplewood, Sibley and Westcott gas production facilities as well as changes to accounts under Westcott LNG storage. The study concludes that the remaining lives on all other electric and natural gas production plant along with gas storage facilities only be adjusted to reflect the "passage of time." Additionally, for the new High Bridge investment and the Grand Meadow Wind Farm, Xcel Energy is recommending certification of remaining lives.

Xcel Energy also completed a review of the electric generation, gas production, and gas storage net salvage rates. The Company recommends that the salvage rates approved in the last Commission Order remain in effect for these assets. Additionally, for the new High Bridge investment and the Grand Meadow Wind Farm, Xcel Energy is recommending certification of new net salvage rates.

The net effect of the change in remaining lives (absent the High Bridge plant, which will be reflected in the MERP rate rider) and without the Grand Meadow Wind Farm, under the proposed Renewable Energy Standard Cost Recovery Rider is a *decrease* in annual depreciation expense of $7.4 million. Xcel Energy requests January 1, 2008 as the effective date for all remaining life changes other than the new High Bridge investment and the Grand Meadow Wind Farm.

State of Minnesota
Before the
Minnesota Public Utilities Commission

LeRoy Koppendrayer	Chair
David Boyd	Commissioner
J. Dennis O'Brien	Commissioner
Thomas Pugh	Commissioner
Phyllis Reha	Commissioner

IN THE MATTER OF THE PETITION OF NORTHERN STATES POWER COMPANY, A MINNESOTA CORPORATION FOR APPROVAL OF THE CERTIFICATION OF OUR 2008 REVIEW OF REMAINING LIVES

DOCKET NO. E,G002/D-08-___

SUMMARY

SUMMARY OF FILING

Please take notice that on February 19, 2008, Northern States Power Company ("Xcel Energy" or the "Company"), a Minnesota corporation filed with the Minnesota Public Utilities Commission (the "Commission") its petition for approval of the 2008 *Review of Remaining Lives*. The Xcel Energy 2008 *Review of Remaining Lives* proposes that depreciation adjustments be made to the life of the Sherco steam production plant, Blue Lake, Granite City, and Key City other production plant, along with the Maplewood, Sibley and Westcott gas production and Wescott Liquefied Natural Gas storage facilities. The study concludes that the remaining lives on all other electric and natural gas production plant along with gas storage facilities only be adjusted to reflect the passage of time. Xcel Energy also has completed a review of the electric generation, natural gas production, and gas storage net salvage rates. The Company recommends that the salvage rates certified in the last Commission Order remain in effect for these assets. Additionally, for the new High Bridge investment and the Grand Meadow Wind Farm, Xcel Energy is recommending certification of life and net salvage rates. The net effect of the change in remaining lives (absent the High Bridge plant, to be reflected in the Metropolitan Emissions Reduction Project rate rider and the Grand Meadow Wind Farm expected to be reflected in the proposed Renewable Energy Standard Cost Recovery Rider Rider) is a decrease in annual depreciation expense of $7.4 million. Xcel Energy requests January 1, 2008 as the effective date for all remaining life changes other than the new High Bridge investment and the Grand Meadow Wind Farm.

Xcel Energy
Summary of Proposed Remaining Lives

Electric Utility
Steam Production

Schedule A

Account	Description	Net Salvage (%)	Remaining Life 01/01/08
Black Dog			
E311	Structures & Improvements	-30	24.0 yrs
E312	Boiler Plant Equipment	0	5.0
E314	Turbogenerator Units	0	5.0
E315	Accessory Electric Equipment	0	5.0
E316	Miscellaneous Power Plant Equipment	0	5.0
High Bridge *(Existing investment under MERP)*			
E311	Structures & Improvements	-20	0.0 yrs
E312	Boiler Plant Equipment	0	0.0
E314	Turbogenerator Units	0	0.0
E315	Accessory Electric Equipment	0	0.0
E316	Miscellaneous Power Plant Equipment	0	0.0
Allen S. King			
E311	Structures & Improvements	-40	29.5 yrs
E312	Boiler Plant Equipment	0	29.5
E314	Turbogenerator Units	0	29.5
E315	Accessory Electric Equipment	0	29.5
E316	Miscellaneous Power Plant Equipment	0	29.5
Minnesota Valley			
E311	Structures & Improvements	-70	9.5 yrs
E312	Boiler Plant Equipment	-70	9.5
E314	Turbogenerator Units	-70	9.5
E315	Accessory Electric Equipment	-70	9.5
E316	Miscellaneous Power Plant Equipment	-70	9.5
Red Wing			
E311	Structures & Improvements	-35	5.0 yrs
E312	Boiler Plant Equipment	0	5.0
E314	Turbogenerator Units	0	5.0
E315	Accessory Electric Equipment	0	5.0
E316	Miscellaneous Power Plant Equipment	0	5.0
Riverside Unit 7			
E311	Structures & Improvements	-20	7.0 yrs
E312	Boiler Plant Equipment	0	1.6
E314	Turbogenerator Units	0	7.0
E315	Accessory Electric Equipment	0	7.0
E316	Miscellaneous Power Plant Equipment	0	1.6

Xcel Energy
Summary of Proposed Remaining Lives

Schedule A

Electric Utility
Steam Production

Account	Description	Net Salvage (%)	Remaining Life 01/01/08
Riverside Unit 8			
E311	Structures & Improvements	-20	7.0 yrs
E312	Boiler Plant Equipment	0	0.9
E314	Turbogenerator Units	0	0.9
E315	Accessory Electric Equipment	0	0.9
E316	Miscellaneous Power Plant Equipment	0	0.9
Sherco Unit 1 & 2			
E311	Structures & Improvements	-30	15.0 yrs
E312	Boiler Plant Equipment	0	15.0
E314	Turbogenerator Units	0	15.0
E315	Accessory Electric Equipment	0	15.0
E316	Miscellaneous Power Plant Equipment	0	15.0
Sherco Unit 3			
E311	Structures & Improvements	-20	15.0 yrs
E312	Boiler Plant Equipment	0	15.0
E314	Turbogenerator Units	0	15.0
E315	Accessory Electric Equipment	0	15.0
E316	Miscellaneous Power Plant Equipment	0	15.0
Wilmarth			
E311	Structures & Improvements	-35	5.0 yrs
E312	Boiler Plant Equipment	0	5.0
E314	Turbogenerator Units	0	5.0
E315	Accessory Electric Equipment	0	5.0
E316	Miscellaneous Power Plant Equipment	0	5.0

Xcel Energy
Summary of Proposed Remaining Lives

Electric Utility
Nuclear Production

Account	Description	Net Salvage (%)	Remaining Life 01/01/08
Monticello			
E302	Franchises & Consents	0	22.8 yrs
E321	Structures & Improvements	0	22.8
E322	Reactor Plant Equipment	0	22.8
E323	Turbogenerator Units	0	22.8
E324	Accessory Electric Equipment	0	22.8
E325	Miscellaneous Power Plant Equipment	0	22.8
Prairie Island Unit 1 & 2			
E321	Structures & Improvements	0	6.3 yrs
E322	Reactor Plant Equipment	0	6.3
E323	Turbogenerator Units	0	6.3
E324	Accessory Electric Equipment	0	6.3
E325	Miscellaneous Power Plant Equipment	0	6.3
Prairie Island - Interim Storage Facility			
E321	Structures and Improvements	0	6.3 yrs
E322	Reactor Plant Equipment	0	6.3

Xcel Energy
Summary of Proposed Remaining Lives

Electric Utility
Hydro Production

Account	Description	Net Salvage (%)	Remaining Life 01/01/08
Hennepin Island			
E302	Franchises & Consents	0	26.2 yrs
E331	Structures & Improvements	-30	26.2
E332	Reservoirs, Dams & Waterways	-30	26.2
E333	Water Wheels, Turbines & Generators	-30	26.2
E334	Accessory Electric Equipment	-30	26.2
E335	Miscellaneous Power Plant Equipment	-30	26.2
Lower Dam			
E331	Structures & Improvements	-30	26.2 yrs
E332	Reservoirs, Dams & Waterways	-30	26.2
Upper Dam			
E332	Reservoirs, Dams & Waterways	-30	26.2 yrs
E335	Miscellaneous Power Plant Equipment	-30	26.2

Xcel Energy
Summary of Proposed Remaining Lives

Electric Utility
Other Production

Schedule A

Account	Description	Net Salvage (%)	Remaining Life 01/01/08
Alliant Tech			
E344	Generators	0	4.8 yrs
Angus C. Anson Unit 2 & 3			
E341	Structures & Improvements	-10	27.4 yrs
E342	Fuel Holders, Producers & Accessories	0	11.8
E344	Generators	0	11.8
E345	Accessory Electric Equipment	0	11.8
E346	Miscellaneous Power Plant Equipment	0	11.8
Angus C. Anson Unit 4			
E341	Structures & Improvements	-10	27.4 yrs
E342	Fuel Holders, Producers & Accessories	0	27.4
E344	Generators	0	27.4
E345	Accessory Electric Equipment	0	27.4
E346	Miscellaneous Power Plant Equipment	0	27.4
Black Dog Unit 5			
E341	Structures & Improvements	-30	24.0 yrs
E342	Fuel Holders, Producers & Accessories	0	24.0
E344	Generators	0	24.0
E345	Accessory Electric Equipment	0	24.0
E346	Miscellaneous Power Plant Equipment	0	24.0
Blue Lake Units 1 thru 4			
E341	Structures & Improvements	-25	27.4 yrs
E342	Fuel Holders, Producers & Accessories	0	5.0
E344	Generators	0	5.0
E345	Accessory Electric Equipment	0	5.0
E346	Miscellaneous Power Plant Equipment	0	5.0
Blue Lake Units 7 & 8			
E341	Structures & Improvements	-25	27.4 yrs
E342	Fuel Holders, Producers & Accessories	0	27.4
E344	Generators	0	27.4
E345	Accessory Electric Equipment	0	27.4
E346	Miscellaneous Power Plant Equipment	0	27.4

Xcel Energy
Summary of Proposed Remaining Lives

Electric Utility
Other Production

Account	Description	Net Salvage (%)	Remaining Life 01/01/08
Grand Meadow Wind Farm *(In-service date, not January 1, 2008)*			
E340.1	Wind Rights	0	25.0 yrs
E341	Structures & Improvements	-10	25.0
E342	Fuel Holders, Producers & Accessories	-10	25.0
E344	Generators	-10	25.0
E345	Accessory Electric Equipment	-10	25.0
E346	Miscellaneous Power Plant Equipment	-10	25.0
Granite City			
E341	Structures & Improvements	-60	5.0 yrs
E342	Fuel Holders, Producers & Accessories	0	5.0
E344	Generators	0	5.0
E345	Accessory Electric Equipment	0	5.0
E346	Miscellaneous Power Plant Equipment	0	5.0
High Bridge *(MERP in-service date, not January 1, 2008)*			
E341	Structures & Improvements	-10	30.0 yrs
E342	Fuel Holders, Producers & Accessories	-10	30.0
E344	Generators	-10	30.0
E345	Accessory Electric Equipment	-10	30.0
E346	Miscellaneous Power Plant Equipment	-10	30.0
Inver Hills			
E341	Structures & Improvements	-30	9.0 yrs
E342	Fuel Holders, Producers & Accessories	0	9.0
E344	Generators	0	9.0
E345	Accessory Electric Equipment	0	9.0
E346	Miscellaneous Power Plant Equipment	0	9.0
Key City			
E341	Structures & Improvements	-20	5.0 yrs
E342	Fuel Holders, Producers & Accessories	-20	5.0
E344	Generators	-20	5.0
E345	Accessory Electric Equipment	-20	5.0
E346	Miscellaneous Power Plant Equipment	-20	5.0
United Hospital			
E344	Generators	0	9.7 yrs
West Faribault			
E341	Structures & Improvements	-40	0.0 yrs
E342	Fuel Holders, Producers & Accessories	-40	0.0
E344	Generators	-40	0.0
E345	Accessory Electric Equipment	-40	0.0
E346	Miscellaneous Power Plant Equipment	-40	0.0

Xcel Energy
Summary of Proposed Remaining Lives

Schedule A

Gas Utility
Gas Production

Account	Description	Net Salvage (%)	Remaining Life 01/01/08
Grand Forks			
G305	Structures & Improvements	-15	5.0 yrs
G311	LP Gas Equipment	4	5.0
G320	Other Equipment	-23	5.0
Maplewood			
G305	Structures & Improvements	-17	8.0 yrs
G311	LP Gas Equipment	8	8.0
G320	Other Equipment	0	8.0
Sibley			
G305	Structures & Improvements	-1	8.0 yrs
G311	LP Gas Equipment	8	8.0
G320	Other Equipment	-1	8.0
Wescott			
G305	Structures & Improvements	-3	10.0 yrs
G311	LP Gas Equipment	1	10.0
G320	Other Equipment	3	10.0

Xcel Energy
Summary of Proposed Remaining Lives

Schedule A

Gas Utility
Gas Storage

Account	Description	Net Salvage (%)	Remaining Life 01/01/08
Wescott			
G361	Structures & Improvements	-10	10.0 yrs
G362	Gas Holders	5	10.0
G363	Purification Equipment	1	10.0
G363.1	Liquefaction Equipment	2	10.0
G363.2	Vaporizing Equipment	2	20.0
G363.3	Compressor Equipment	2	10.0
G363.4	Measuring & Regulating Equipment	6	10.0
G363.5	Other Equipment	0	10.0

Xcel Energy
Comparison of Present and Proposed Lives

Electric and Gas Utilities

	Plant Balance 1/1/2008	Reserve Balance 1/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Total Steam Production	2,158,265,538	1,200,962,480	15.5	14.5	-4.2	72,224,988	15.9	-4.2	65,889,894	(6,335,094)
Total Nuclear Production	1,765,718,882	1,239,481,620	9.4	8.4	0.0	62,451,671	8.4	0.0	62,451,671	-
Total Hydro Production	11,272,336	5,728,211	27.2	26.2	-30.0	308,203	26.2	-30.0	308,203	-
Total Other Production	405,817,045	156,129,517	20.0	19.0	-1.6	13,504,865	20.0	-1.6	12,838,466	(666,399)
Total Gas Production	14,826,387	12,148,420	5.9	4.9	2.5	471,785	8.6	2.5	268,877	(202,907)
Total Gas Storage	32,857,570	24,193,587	11.1	10.1	0.8	833,803	14.1	0.8	597,468	(236,335)
Total Company	4,388,757,758	2,638,643,836				149,795,315			142,354,580	(7,440,735)

	Plant Balance 5/1/2008	Reserve Balance 5/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed 7.5 Months Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Total High Bridge MERP	369,523,297	-	0.0	0.0	0.0	-	30.0	-10.0	8,468,242	8,468,242

	Plant Balance 11/1/2008	Reserve Balance 11/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed 1.5 Months Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
Total Grand Meadow Wind Farm	211,778,296	-	0.0	0.0	0.0	-	25.0	-10.0	1,164,781	1,164,781
Total MERP and Wind Power	581,301,593	-							9,633,023	9,633,023

Total Change to Depreciation Expense	**2,192,288**

Electric Utility
Steam Production

	Plant Balance 1/1/2008	Reserve Balance 1/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
E311 Structures & Improvements										
Black Dog	26,580,940	25,101,593	25.0	24.0	-30.0	393,901	24.0	-30.0	393,901	-
High Bridge	3,317,967	8,472,590	1.0	-	-20.0	0	-	-20.0	0	-
Allen S. King	29,782,171	17,687,222	30.5	29.5	-40.0	813,824	29.5	-40.0	813,824	-
Minnesota Valley	4,511,081	5,944,606	10.5	9.5	-70.0	181,498	9.5	-70.0	181,498	-
Red Wing	5,649,709	6,923,135	6.0	5.0	-35.0	140,794	5.0	-35.0	140,794	-
Riverside Unit 7 & 8	27,895,010	17,600,089	8.0	7.0	-20.0	2,267,703	7.0	-20.0	2,267,703	-
Sherco Unit 1 & 2	84,168,758	68,010,626	13.0	12.0	-30.0	3,450,730	15.0	-30.0	2,760,584	(690,146)
Sherco Unit 3	127,643,716	89,552,553	13.8	12.8	-20.0	4,970,305	15.0	-20.0	4,241,327	(728,978)
Wilmarth	6,255,671	7,262,845	6.0	5.0	-35.0	236,462	5.0	-35.0	236,462	-
Total/Composite	315,805,024	246,555,258	13.3	12.3	-26.7	12,455,219	13.9	-26.7	11,036,095	(1,419,124)
E312 Boiler Plant Equipment										
Black Dog	51,899,392	41,148,769	6.0	5.0	0.0	2,150,125	5.0	0.0	2,150,125	-
High Bridge	1,119,224	1,119,224	1.0	-	0.0	-	-	0.0	-	-
Allen S. King	439,694,490	57,284,532	30.5	29.5	0.0	12,963,049	29.5	0.0	12,963,049	-
Minnesota Valley	6,460,288	7,546,801	10.5	9.5	-70.0	361,651	9.5	-70.0	361,651	-
Red Wing	33,640,987	30,760,033	6.0	5.0	0.0	576,191	5.0	0.0	576,191	-
Riverside Unit 7	52,892,345	46,236,229	2.6	1.6	0.0	4,160,072	1.6	0.0	4,160,072	-
Riverside Unit 8	37,831,052	36,238,863	1.9	0.9	0.0	1,769,099	0.9	0.0	1,769,099	-
Sherco Unit 1 & 2	315,390,286	199,552,006	13.0	12.0	0.0	9,653,190	15.0	0.0	7,722,552	(1,930,638)
Sherco Unit 3	357,759,323	210,171,772	13.8	12.8	0.0	11,530,277	15.0	0.0	9,839,170	(1,691,107)
Wilmarth	30,347,660	28,912,901	6.0	5.0	0.0	286,952	5.0	0.0	286,952	-
Total/Composite	1,327,035,047	658,971,130	16.5	15.5	-0.3	43,450,607	16.9	-0.3	39,828,862	(3,621,744)

Notes
Col(6) = { Col(1) * {1-Col(5)} - Col(2) } / Col(4)
Col(9) = { Col(1) * {1-Col(8) } - Col(2) }/ Col(7)
Col(10) = Col(9) - Col(6)

Electric Utility
Steam Production

	Plant Balance 1/1/2008	Reserve Balance 1/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
E314 Turbogenerator Units										
Black Dog	33,604,927	29,718,508	6.0	5.0	0.0	777,284	5.0	0.0	777,284	-
High Bridge	675,742	675,742	1.0	-	0.0	-	-	0.0	-	-
Allen S. King	84,132,193	15,104,792	30.5	29.5	0.0	2,339,912	29.5	0.0	2,339,912	-
Minnesota Valley	2,156,244	2,518,888	10.5	9.5	-70.0	120,708	9.5	-70.0	120,708	-
Red Wing	1,571,661	1,480,529	6.0	5.0	0.0	18,226	5.0	0.0	18,226	-
Riverside Unit 7	19,231,592	14,112,647	8.0	7.0	0.0	731,278	7.0	0.0	731,278	-
Riverside Unit 8	13,055,487	12,060,532	1.9	0.9	0.0	1,105,505	0.9	0.0	1,105,505	-
Sherco Unit 1 & 2	85,311,165	54,656,464	13.0	12.0	0.0	2,554,558	15.0	0.0	2,043,647	(510,912)
Sherco Unit 3	56,686,080	33,359,495	13.8	12.8	0.0	1,822,389	15.0	0.0	1,555,106	(267,284)
Wilmarth	2,295,605	2,219,804	6.0	5.0	0.0	15,160	5.0	0.0	15,160	-
Total/Composite	298,720,696	165,907,401	15.2	14.2	-0.5	9,485,021	15.4	-0.5	8,706,826	(778,195)
E315 Accessory Electric Equipment										
Black Dog	12,093,253	7,872,909	6.0	5.0	0.0	844,069	5.0	0.0	844,069	-
High Bridge	3,842,002	3,842,002	1.0	-	0.0	-	-	0.0	-	-
Allen S. King	38,500,127	2,018,603	30.5	29.5	0.0	1,236,662	29.5	0.0	1,236,662	-
Minnesota Valley	598,206	698,814	10.5	9.5	-70.0	33,488	9.5	-70.0	33,488	-
Red Wing	1,341,069	1,269,068	6.0	5.0	0.0	14,400	5.0	0.0	14,400	-
Riverside Unit 7	13,377,539	9,801,445	8.0	7.0	0.0	510,871	7.0	0.0	510,871	-
Riverside Unit 8	4,714,460	4,425,963	1.9	0.9	0.0	320,552	0.9	0.0	320,552	-
Sherco Unit 1 & 2	33,361,975	27,327,507	13.0	12.0	0.0	502,872	15.0	0.0	402,298	(100,574)
Sherco Unit 3	57,053,568	35,582,712	13.8	12.8	0.0	1,677,411	15.0	0.0	1,431,390	(246,020)
Wilmarth	761,485	736,502	6.0	5.0	0.0	4,997	5.0	0.0	4,997	-
Total/Composite	165,643,685	93,575,525	15.1	14.1	-0.3	5,145,321	15.1	-0.3	4,798,727	(346,594)

Notes
Col(6) = { Col(1) * {1-Col(5)} - Col(2) } / Col(4)
Col(9) = { Col(1) * {1-Col(8) } - Col(2) }/ Col(7)
Col(10) = Col(9) - Col(6)

Electric Utility
Steam Production

	Plant Balance 1/1/2008	Reserve Balance 1/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
E316 Miscellaneous Power Plant Equipment										
Black Dog	2,346,409	2,352,453	6.0	5.0	0.0	(1,209)	5.0	0.0	(1,209)	-
High Bridge	621,867	648,377	1.0	-	0.0	-	-	0.0	-	-
Allen S. King	5,315,314	4,479,946	30.5	29.5	0.0	28,318	29.5	0.0	28,318	-
Minnesota Valley	311,744	364,174	10.5	9.5	-70.0	17,452	9.5	-70.0	17,452	-
Red Wing	755,418	755,138	6.0	5.0	0.0	56	5.0	0.0	56	-
Riverside Unit 7	4,441,492	3,830,257	2.6	1.6	0.0	382,022	1.6	0.0	382,022	-
Riverside Unit 8	1,690,240	1,523,628	1.9	0.9	0.0	185,125	0.9	0.0	185,125	-
Sherco Unit 1 & 2	8,702,886	6,007,772	13.0	12.0	0.0	224,593	15.0	0.0	179,674	(44,919)
Sherco Unit 3	26,200,100	15,333,270	13.8	12.8	0.0	848,971	15.0	0.0	724,455	(124,516)
Wilmarth	675,616	658,152	6.0	5.0	0.0	3,493	5.0	0.0	3,493	-
Total/Composite	51,061,086	35,953,168	10.1	9.1	-0.4	1,688,819	10.1	-0.4	1,519,385	(169,434)
Total Steam Production	2,158,265,538	1,200,962,480	15.5	14.5	-4.2	72,224,988	15.9	-4.2	65,889,894	(6,335,094)

Notes
Col(6) = { Col(1) * {1-Col(5)} - Col(2) } / Col(4)
Col(9) = { Col(1) * {1-Col(8) } - Col(2) }/ Col(7)
Col(10) = Col(9) - Col(6)

Xcel Energy
Comparison of Present and Proposed Lives

Electric Utility
Nuclear Production

	Plant Balance 1/1/2008	Reserve Balance 1/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
E302 Franchises & Consents										
Monticello	32,269,486	983,591	-	22.8	0.0	1,372,188	22.8	0.0	1,372,188	-
Total/Composite	32,269,486	983,591	0.0	22.8	0.0	1,372,188	22.8	0.0	1,372,188	-
E321 Structures & Improvements										
Monticello	131,774,801	89,987,906	23.8	22.8	0.0	1,832,759	22.8	0.0	1,832,759	-
Prairie Island Unit 1 & 2	193,101,782	160,820,902	7.3	6.3	0.0	5,123,949	6.3	0.0	5,123,949	-
PI Interim Storage	11,938,940	10,649,753	7.3	6.3	0.0	204,633	6.3	0.0	204,633	-
Total/Composite	336,815,523	261,458,561	11.5	10.5	0.0	7,161,341	10.5	0.0	7,161,341	-
E322 Reactor Plant Equipment										
Monticello	302,916,308	232,413,525	23.8	22.8	0.0	3,092,227	22.8	0.0	3,092,227	-
Prairie Island Unit 1 & 2	475,576,942	285,806,809	7.3	6.3	0.0	30,122,243	6.3	0.0	30,122,243	-
PI Interim Storage	47,285,178	20,604,520	7.3	6.3	0.0	4,235,025	6.3	0.0	4,235,025	-
Total/Composite	825,778,428	538,824,853	8.7	7.7	0.0	37,449,496	7.7	0.0	37,449,496	-
E323 Turbogenerator Units										
Monticello	56,629,671	37,448,794	23.8	22.8	0.0	841,267	22.8	0.0	841,267	-
Prairie Island Unit 1 & 2	148,199,142	116,283,205	7.3	6.3	0.0	5,066,022	6.3	0.0	5,066,022	-
Total/Composite	204,828,813	153,731,999	9.6	8.6	0.0	5,907,288	8.6	0.0	5,907,288	-

Notes
Col(6) = { Col(1) * {1-Col(5)} - Col(2) } / Col(4)
Col(9) = { Col(1) * {1-Col(8) } - Col(2) }/ Col(7)
Col(10) = Col(9) - Col(6)

Xcel Energy
Comparison of Present and Proposed Lives

Electric Utility
Nuclear Production

	Plant Balance 1/1/2008	Reserve Balance 1/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
E324 Accessory Electric Equipment										
Monticello	41,006,361	31,609,631	23.8	22.8	0.0	412,137	22.8	0.0	412,137	-
Prairie Island Unit 1 & 2	175,070,623	139,664,446	7.3	6.3	0.0	5,620,028	6.3	0.0	5,620,028	-
Total/Composite	216,076,984	171,274,077	8.4	7.4	0.0	6,032,165	7.4	0.0	6,032,165	-
E325 Miscellaneous Power Plant Equipment										
Monticello	51,127,680	39,786,832	23.8	22.8	0.0	497,406	22.8	0.0	497,406	-
Prairie Island Unit 1 & 2	98,821,967	73,421,707	7.3	6.3	0.0	4,031,787	6.3	0.0	4,031,787	-
Total/Composite	149,949,647	113,208,539	9.1	8.1	0.0	4,529,193	8.1	0.0	4,529,193	-
Total Nuclear Production	1,765,718,882	1,239,481,620	9.4	8.4	0.0	62,451,671	8.4	0.0	62,451,671	-

Notes
Col(6) = { Col(1) * {1-Col(5)} - Col(2) } / Col(4)
Col(9) = { Col(1) * {1-Col(8) } - Col(2) }/ Col(7)
Col(10) = Col(9) - Col(6)

Electric Utility
Hydro Production

	Plant Balance 1/1/2008	Reserve Balance 1/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
E302 Franchises & Consents										
Hennepin Island	2,836,397	61,574	-	26.2	0.0	105,909	26.2	0.0	105,909	-
Total/Composite	2,836,397	61,574	0.0	26.2	0.0	105,909	26.2	0.0	105,909	-
E331 Structures & Improvements										
Hennepin Island	465,509	495,303	27.2	26.2	-30.0	4,193	26.2	-30.0	4,193	-
Lower Dam	42,016	47,082	27.2	26.2	-30.0	288	26.2	-30.0	288	-
Total/Composite	507,525	542,385	27.2	26.2	-30.0	4,481	26.2	-30.0	4,481	-
E332 Reservoirs, Dams & Waterways										
Hennepin Island	1,150,152	449,099	27.2	26.2	-30.0	39,927	26.2	-30.0	39,927	-
Lower Dam	762,902	753,734	27.2	26.2	-30.0	9,085	26.2	-30.0	9,085	-
Upper Dam	4,491,476	2,517,379	27.2	26.2	-30.0	126,776	26.2	-30.0	126,776	-
Total/Composite	6,404,531	3,720,212	27.2	26.2	-30.0	175,789	26.2	-30.0	175,789	-
E333 Water Wheels, Turbines & Generators										
Hennepin Island	1,105,306	1,079,622	27.2	26.2	-30.0	13,636	26.2	-30.0	13,636	-
Total/Composite	1,105,306	1,079,622	27.2	26.2	-30.0	13,636	26.2	-30.0	13,636	-
E334 Accessory Electric Equipment										
Hennepin Island	357,753	264,923	27.2	26.2	-30.0	7,640	26.2	-30.0	7,640	-
Total/Composite	357,753	264,923	27.2	26.2	-30.0	7,640	26.2	-30.0	7,640	-
E335 Miscellaneous Power Plant Equipment										
Hennepin Island	37,779	36,770	27.2	26.2	-30.0	471	26.2	-30.0	471	-
Upper Dam	23,046	22,723	27.2	26.2	-30.0	276	26.2	-30.0	276	-
Total/Composite	60,824	59,494	27.2	26.2	-30.0	747	26.2	-30.0	747	-
Total Hydro Production	11,272,336	5,728,211	27.2	26.2	-30.0 *	308,203	26.2	-30.0 *	308,203	-

Notes
Col(6) = { Col(1) * {1-Col(5)} - Col(2) } / Col(4)
Col(9) = { Col(1) * {1-Col(8) } - Col(2) }/ Col(7)
Col(10) = Col(9) - Col(6)

* Composite Net Salvage % excludes E302

Xcel Energy
Comparison of Present and Proposed Lives

Electric Utility
Other Production

	Plant Balance 1/1/2008	Reserve Balance 1/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
E341 Structures & Improvements										
Angus C. Anson	7,440,738	3,866,915	28.4	27.4	-10.0	157,587	27.4	-10.0	157,587	-
Black Dog Unit 5	4,008,855	902,465	25.0	24.0	-30.0	179,544	24.0	-30.0	179,544	-
Blue Lake	1,583,182	1,081,118	28.4	27.4	-25.0	32,769	27.4	-25.0	32,769	-
Granite City	1,241,718	1,542,849	3.0	2.0	-60.0	221,950	5.0	-60.0	88,780	(133,170)
Inver Hills	1,248,689	1,259,496	10.0	9.0	-30.0	40,422	9.0	-30.0	40,422	-
Key City	1,002,265	1,103,118	3.0	2.0	-20.0	49,800	5.0	-20.0	19,920	(29,880)
West Faribault	117,231	164,123	0.0	0.0	-40.0	-	0.0	-40.0	-	-
Total/Composite	16,642,677	9,920,083	16.3	15.3	-22.3	682,072	20.1	-22.3	519,022	(163,050)
E342 Fuel Holders, Producers & Accessories										
Angus C. Anson Unit 2 & 3	1,094,780	619,960	12.8	11.8	0.0	40,239	11.8	0.0	40,239	-
Black Dog Unit 5	3,991,439	712,928	25.0	24.0	0.0	136,605	24.0	0.0	136,605	-
Blue Lake Units 1 thru 4	1,311,529	998,201	4.0	3.0	0.0	104,443	5.0	0.0	62,666	(41,777)
Granite City	416,373	404,441	3.0	2.0	0.0	5,966	5.0	0.0	2,386	(3,580)
Inver Hills	2,903,525	1,969,744	10.0	9.0	0.0	103,753	9.0	0.0	103,753	-
Key City	242,384	277,621	3.0	2.0	-20.0	6,620	5.0	-20.0	2,648	(3,972)
West Faribault	94,267	131,973	0.0	0.0	-40.0	-	0.0	-40.0	-	-
Total/Composite	10,054,297	5,114,869	13.6	12.6	-0.9	397,626	14.4	-0.9	348,297	(49,329)

Notes
Col(6) = { Col(1) * {1-Col(5)} - Col(2) } / Col(4)
Col(9) = { Col(1) * {1-Col(8) } - Col(2) }/ Col(7)
Col(10) = Col(9) - Col(6)

Electric Utility
Other Production

	Plant Balance 1/1/2008	Reserve Balance 1/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
E344 Generators										
Alliant Tech	467,475	393,504	5.8	4.8	0.0	15,410	4.8	0.0	15,410	-
Angus C. Anson Unit 2 & 3	66,430,290	32,785,918	12.8	11.8	0.0	2,851,218	11.8	0.0	2,851,218	-
Angus C. Anson Unit 4	32,075,871	2,803,205	28.4	27.4	0.0	1,068,345	27.4	0.0	1,068,345	-
Black Dog Unit 5	107,679,392	11,521,312	25.0	24.0	0.0	4,006,587	24.0	0.0	4,006,587	-
Blue Lake Units 1 thru 4	21,165,263	19,801,166	4.0	3.0	0.0	454,699	5.0	0.0	272,819	(181,880)
Blue Lake Unit 7 & 8	59,285,109	5,165,570	28.4	27.4	0.0	1,975,166	27.4	0.0	1,975,166	-
Granite City	6,361,287	6,080,729	3.0	2.0	0.0	140,279	5.0	0.0	56,112	(84,167)
Inver Hills	45,335,225	39,528,002	10.0	9.0	0.0	645,247	9.0	0.0	645,247	-
Key City	5,500,211	6,305,221	3.0	2.0	-20.0	147,516	5.0	-20.0	59,006	(88,510)
United Hospital	2,031,625	1,251,469	10.7	9.7	0.0	80,428	9.7	0.0	80,428	-
West Faribault	2,992,437	4,189,412	0.0	0.0	-40.0	-	0.0	-40.0	-	-
Total/Composite	349,324,184	129,825,506	20.5	19.5	-0.7	11,384,896	20.1	-0.7	11,030,339	(354,557)
E345 Accessory Electric Equipment										
Angus C. Anson Unit 2 & 3	3,078,750	1,612,020	12.8	11.8	0.0	124,299	11.8	0.0	124,299	-
Angus C. Anson Unit 4	4,598,891	362,810	28.4	27.4	0.0	154,602	27.4	0.0	154,602	-
Black Dog Unit 5	3,962,646	721,200	25.0	24.0	0.0	135,060	24.0	0.0	135,060	-
Blue Lake Units 1 thru 4	1,349,578	1,308,992	4.0	3.0	0.0	13,529	5.0	0.0	8,117	(5,412)
Blue Lake Unit 7 & 8	7,798,698	694,899	28.4	27.4	0.0	259,263	27.4	0.0	259,263	-
Granite City	556,060	426,687	3.0	2.0	0.0	64,686	5.0	0.0	25,875	(38,812)
Inver Hills	2,234,187	1,650,005	10.0	9.0	0.0	64,909	9.0	0.0	64,909	-
Key City	1,586,764	1,773,624	3.0	2.0	-20.0	65,246	5.0	-20.0	26,098	(39,148)
West Faribault	329,465	461,251	0.0	0.0	-40.0	-	0.0	-40.0	-	-
Total/Composite	25,495,039	9,011,489	20.2	19.2	-1.8	881,594	21.2	-1.8	798,223	(83,370)

Notes
Col(6) = { Col(1) * {1-Col(5)} - Col(2) } / Col(4)
Col(9) = { Col(1) * {1-Col(8) } - Col(2) }/ Col(7)
Col(10) = Col(9) - Col(6)

Xcel Energy
Comparison of Present and Proposed Lives

Electric Utility
Other Production

	Plant Balance 1/1/2008	Reserve Balance 1/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
E346 Miscellaneous Power Plant Equipment										
Angus C. Anson Unit 2 & 3	1,330,783	487,244	12.8	11.8	0.0	71,486	11.8	0.0	71,486	-
Black Dog Unit 5	1,486,097	273,835	25.0	24.0	0.0	50,511	24.0	0.0	50,511	-
Blue Lake Units 1 thru 4	424,921	354,544	4.0	3.0	0.0	23,459	5.0	0.0	14,075	(9,384)
Granite City	13,279	13,278	3.0	2.0	0.0	-	5.0	0.0	-	-
Inver Hills	597,816	579,461	10.0	9.0	0.0	2,039	9.0	0.0	2,039	-
Key City	277,794	310,989	3.0	2.0	-20.0	11,182	5.0	-20.0	4,473	(6,709)
West Faribault	170,156	238,219	0.0	0.0	-40.0	-	0.0	-40.0	-	-
Total/Composite	4,300,848	2,257,570	14.7	13.7	-2.9	158,678	15.2	-2.9	142,585	(16,093)
Total Other Production	405,817,045	156,129,517	20.0	19.0	-1.6	13,504,865	20.0	-1.6	12,838,466	(666,399)

Notes
Col(6) = { Col(1) * {1-Col(5)} - Col(2) } / Col(4)
Col(9) = { Col(1) * {1-Col(8) } - Col(2) }/ Col(7)
Col(10) = Col(9) - Col(6)

Xcel Energy
Comparison of Present and Proposed Lives

Electric Utility
Other Production-High Bridge (MERP Rider)

	Plant Balance 5/1/2008	Reserve Balance 5/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed 7.5 Months Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
E341 Structures & Improvements										
High Bridge MERP	3,796,550	-	0.0	0.0	0.0	-	30.0	-10.0	87,004	87,004
E342 Fuel Holders, Producers & Accessories										
High Bridge MERP	5,229,586	-	0.0	0.0	0.0	-	30.0	-10.0	119,845	119,845
E344 Generators										
High Bridge MERP	355,151,887	-	0.0	0.0	0.0	-	30.0	-10.0	8,138,897	8,138,897
E345 Accessory Electric Equipment										
High Bridge MERP	5,296,033	-	0.0	0.0	0.0	-	30.0	-10.0	121,367	121,367
E346 Miscellaneous Power Plant Equipment										
High Bridge MERP	49,241	-	0.0	0.0	0.0	-	30.0	-10.0	1,128	1,128
Total High Bridge MERP	369,523,297	-	0.0	0.0	0.0	-	30.0	-10.0	8,468,242	8,468,242

Notes
Col(6) = { Col(1) * {1-Col(5)} - Col(2) } / Col(4)
Col(9) = { Col(1) * {1-Col(8) } - Col(2) }/ Col(7)
Col(10) = Col(9) - Col(6)

Xcel Energy
Comparison of Present and Proposed Lives

Electric Utility
Other Production-Grand Meadow Wind Farm

			Present				Proposed			Proposed
	Plant Balance 11/1/2008	Reserve Balance 11/1/2008	Approved Rem Life (Yrs)	Rem. Life (Yrs)	Net Salv %	Depreciation Expense	Rem. Life (Yrs)	Net Salv %	1.5 Months Depreciation Expense	Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
E344 Generators										
Grand Meadow Wind Farm	211,778,296	-	0.0	0.0	0.0	-	25.0	-10.0	1,164,781	1,164,781
Total Grand Meadow Wind Farm	211,778,296	-	0.0	0.0	0.0	-	25.0	-10.0	1,164,781	1,164,781

Notes
Col(6) = { Col(1) * {1-Col(5)} - Col(2) } / Col(4)
Col(9) = { Col(1) * {1-Col(8) } - Col(2) }/ Col(7)
Col(10) = Col(9) - Col(6)

Xcel Energy
Comparison of Present and Proposed Lives

Gas Utility
Production

	Plant Balance 1/1/2008	Reserve Balance 1/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
G305 Structures & Improvements										
Grand Forks	197,902	219,252	6.0	5.0	-15.0	1,667	5.0	-15.0	1,667	-
Maplewood	892,001	676,062	7.0	6.0	-17.0	61,263	8.0	-17.0	45,947	(15,316)
Sibley	776,690	681,966	4.0	3.0	-1.0	34,164	8.0	-1.0	12,811	(21,352)
Wescott	791,416	710,869	7.0	6.0	-3.0	17,382	10.0	-3.0	10,429	(6,953)
Total/Composite	2,658,008	2,288,149	6.1	5.1	-8.0	114,475	8.2	-8.0	70,855	(43,621)
G311 LP Gas Equipment										
Grand Forks	822,226	720,609	6.0	5.0	4.0	13,745	5.0	4.0	13,745	-
Maplewood	3,024,656	2,467,224	7.0	6.0	8.0	52,577	8.0	8.0	39,432	(13,144)
Sibley	3,252,921	2,625,817	4.0	3.0	8.0	122,290	8.0	8.0	45,859	(76,431)
Wescott	4,380,384	3,421,508	7.0	6.0	1.0	152,512	10.0	1.0	91,507	(61,005)
Total/Composite	11,480,187	9,235,158	5.9	4.9	5.0	341,124	8.7	5.0	190,544	(150,580)
G320 Other Equipment										
Grand Forks	8,669	9,720	6.0	5.0	-23.0	189	5.0	-23.0	189	-
Maplewood	203,004	187,979	7.0	6.0	0.0	2,504	8.0	0.0	1,878	(626)
Sibley	259,163	225,978	4.0	3.0	-1.0	11,926	8.0	-1.0	4,472	(7,454)
Wescott	217,356	201,437	7.0	6.0	3.0	1,566	10.0	3.0	940	(627)
Total/Composite	688,192	625,113	4.8	3.8	0.3	16,185	8.2	0.3	7,479	(8,706)
Total Gas Production	14,826,387	12,148,420	5.9	4.9	2.5	471,785	8.6	2.5	268,877	(202,908)

Notes
Col(6) = { Col(1) * {1-Col(5)} - Col(2) } / Col(4)
Col(9) = { Col(1) * {1-Col(8) } - Col(2) }/ Col(7)
Col(10) = Col(9) - Col(6)

Xcel Energy
Comparison of Present and Proposed Lives

Gas Utility
Storage

	Plant Balance 1/1/2008	Reserve Balance 1/1/2008	Present Approved Rem Life (Yrs)	Present Rem. Life (Yrs)	Present Net Salv %	Present Depreciation Expense	Proposed Rem. Life (Yrs)	Proposed Net Salv %	Proposed Depreciation Expense	Proposed Less Present Expense
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
G361 Structures & Improvements										
Wescott	4,719,382	4,438,581	7.0	6.0	-10.0	125,456	10.0	-10.0	75,274	(50,183)
G362 Gas Holders										
Wescott	8,173,390	6,860,625	7.0	6.0	5.0	150,683	10.0	5.0	90,410	(60,273)
G363 Purification Equipment										
Wescott	1,166,037	1,033,862	7.0	6.0	1.0	20,086	10.0	1.0	12,051	(8,034)
G363.1 Liquefaction Equipment										
Wescott	2,811,486	1,812,430	7.0	6.0	2.0	157,138	10.0	2.0	94,283	(62,855)
G363.2 Vaporizing Equipment										
Wescott	8,423,026	3,395,247	21.0	20.0	2.0	242,966	20.0	2.0	242,966	-
G363.3 Compressor Equipment										
Wescott	4,191,917	3,816,079	7.0	6.0	2.0	48,666	10.0	2.0	29,200	(19,467)
G363.4 Measuring & Regulating Equipment										
Wescott	45,363	40,034	7.0	6.0	6.0	435	10.0	6.0	261	(174)
G363.5 Other Equipment										
Wescott	3,326,970	2,796,728	7.0	6.0	0.0	88,374	10.0	0.0	53,024	(35,349)
Total Gas Storage	32,857,570	24,193,587	11.1	10.1	0.8	833,803	14.1	0.8	597,468	(236,335)

Notes
Col(6) = { Col(1) * {1-Col(5)} - Col(2) } / Col(4)
Col(9) = { Col(1) * {1-Col(8) } - Col(2) }/ Col(7)
Col(10) = Col(9) - Col(6)

Xcel Energy
2007 Plant In-service
Electric Utility

FERC Account	Utility Account	Account Description	Beginning Balance	Additions	Retirements	Transfers	Adjustments	Ending Balance
Steam								
310	10310001	Land & Land Rights - Fee	10,164,962					10,164,962
310	10310002	Land & Land Rights - Other	29,849					29,849
311	10311000	Structures & Improvements	338,094,109	6,540,509	-26,881,875	-1,947,719		315,805,024
312	10312000	Boiler Plant Equipment	1,006,053,077	402,025,170	-79,560,097	-1,483,104		1,327,035,046
314	10314000	Turbogenerator Units	247,599,148	75,015,531	-26,333,456	2,439,473		298,720,696
315	10315000	Accessory Electric Equipment	141,293,455	38,865,541	-14,879,601	364,289		165,643,685
316	10316000	Miscellaneous Power Plant Equipment	58,122,278	-124,942	-7,006,156	69,906		51,061,086
	Total		1,801,356,877	522,321,811	-154,661,185	-557,156	0	2,168,460,348
Nuclear								
302	10302002	Franchises & Consents	0	20,101,111		12,168,376		32,269,486
320	10320001	Land & Land Rights - Fee	1,143,331			25,406		1,168,737
320	10320002	Land and Land Rights - Other	27,136			-25,406		1,730
321	10321000	Structures & Improvements	321,500,624	21,868,795	-123,797	-6,430,099		336,815,523
322	10322000	Reactor Plant Equipment	801,494,871	27,856,838	-2,960,897	-612,383		825,778,428
323	10323000	Turbogenerator Units	198,465,354	6,363,459				204,828,813
324	10324000	Accessory Electric Equipment	213,959,189	2,172,148		-54,352		216,076,984
325	10325000	Miscellaneous Power Plant Equipment	149,517,073	3,051,477	-875,794	-1,743,110		149,949,647
	Total		1,686,107,577	81,413,828	-3,960,489	3,328,432	0	1,766,889,349
Hydro								
302	10302001	Franchises & Consents	0	2,836,397				2,836,397
330	10330001	Land & Land Rights - Fee	298,638					298,638
330	10330012	Land & Land Rights - Other	1,400,213					1,400,213
331	10331000	Structures & Improvements	545,449					545,449
332	10332000	Reservoirs, Dams & Waterways	6,119,879	530,256				6,650,135
333	10333000	Water Wheels, Turbines & Generators	1,128,023		-22,717			1,105,306
334	10334000	Accessory Electric Equipment	266,037	91,716				357,753
335	10335000	Miscellaneous Power Plant Equipment	61,252	0		-428		60,824
	Total		9,819,491	3,458,369	-22,717	-428	0	13,254,716
Other								
340	10340001	Land & Land Rights - Fee	1,692,701	289		-123,736		1,569,253
340	10340002	Land & Land Rights - Other	10,245,151			123,736		10,368,887
341	10341000	Structures & Improvements	16,553,118	66,413	-34,506	57,653		16,642,677
342	10342000	Fuel Holders, Producers & Accessories	10,049,919	4,377				10,054,297
344	10344000	Generators	350,533,451	1,278,112	-1,684,962	14,374		350,140,975
344	10344010	Photovoltaics - CIP Equipment	306,139					306,139
345	10345000	Accessory Electric Equipment	25,359,968	135,071				25,495,039
346	10346000	Miscellaneous Power Plant Equipment	4,245,149	136,343		-80,644		4,300,848
	Total		418,985,595	1,620,604	-1,719,468	-8,617	0	418,878,115
Utility Total			3,916,269,540	608,814,612	-160,363,857	2,762,231	0	4,367,482,527

FERC Account	Utility Account	Account Description	Beginning Balance	Additions	Retirements	Transfers	Adjustments	Ending Balance
Production								
304	20304001	Land & Land Rights - Fee	787,290					787,290
304	20304002	Land & Land Rights - Other	34,537					34,537
305	20305000	Structures & Improvements	2,475,015	182,993				2,658,008
311	20311000	LP Gas Equipment	11,848,418	150,175		-214,149		11,784,445
320	20320000	Other Equipment	688,192					688,192
	Total		15,833,454	333,168	0	-214,149	0	15,952,474
Storage								
360	20360001	Land & Land Rights - Fee	5,000		-5,000			0
360	20360002	Land & Land Rights - Other	11,264					11,264
361	20361000	Structures & Improvements	4,719,382					4,719,382
362	20362000	Gas Holders	8,150,695	22,695				8,173,390
363	20363000	Purification Equipment	1,217,868		-51,832			1,166,037
363.1	20363100	Liquefaction Equipment	2,805,986	5,501				2,811,486
363.2	20363200	Vaporizing Equipment	8,098,074	324,952				8,423,026
363.3	20363300	Compressor Equipment	4,191,917					4,191,917
363.4	20363400	Measuring & Regulating Equipment	45,363					45,363
363.5	20363500	Other Equipment	3,122,017	259,929	-54,976			3,326,970
	Total		32,367,566	613,077	-111,808	0	0	32,868,835
Utility Total			48,201,020	946,245	-111,808	-214,149	0	48,821,308

Xcel Energy
2007 Analysis of Depreciation Reserve
Electric Utility

FERC Account	Utility Account	Account Description	Beginning Balance	Credits: Accruals	Credits: Gross Salvage	Debits: Retirements	Debits: Cost of Removal	Transfers Adjustment and Other Credits (Debits)	Ending Balance
Steam									
311	10311000	Structures & Improvements	277,424,522	13,883,560	164,643	26,881,875	17,860,434	-175,158	246,555,258
312	10312000	Boiler Plant Equipment	700,111,501	39,370,663	228,433	79,560,097	1,036,248	-143,122	658,971,130
314	10314000	Turbogenerator Units	183,739,196	8,640,992	6,375	26,333,456	272,786	127,080	165,907,401
315	10315000	Accessory Electric Equipment	103,515,822	4,824,162	0	14,879,601	1,602	116,744	93,575,525
316	10316000	Miscellaneous Power Plant Equipment	41,090,030	1,829,869	3,646	7,006,156	1,395	40,250	35,956,244
	Total		1,305,881,070	68,549,246	403,096	154,661,185	19,172,465	-34,205	1,200,965,557
Nuclear									
302	10302002	Franchises & Consents	0	576,342				407,249	983,591
321	10321000	Structures & Improvements	256,006,816	7,028,924	0	123,797	248,472	-1,204,910	261,458,561
322	10322000	Reactor Plant Equipment	507,494,644	36,547,490	72,407	2,960,897	2,195,062	-133,728	538,824,853
323	10323000	Turbogenerator Units	148,098,255	5,633,745	0	0	0	0	153,731,999
324	10324000	Accessory Electric Equipment	165,299,415	5,990,196	0	0	5,208	-10,327	171,274,077
325	10325000	Miscellaneous Power Plant Equipment	109,569,087	4,522,234	0	875,794	70,990	64,003	113,208,539
	Total		1,186,468,216	60,298,930	72,407	3,960,489	2,519,732	-877,712	1,239,481,620
Hydro									
302	10302001	Franchises & Consents	0	61,574					61,574
331	10331000	Structures & Improvements	579,615	4,486	0	0	0	0	584,102
332	10332000	Reservoirs, Dams & Waterways	3,848,337	154,320	0	0	0	0	4,002,657
333	10333000	Water Wheels, Turbines & Generators	1,098,716	13,639	0	22,717	10,016	0	1,079,622
334	10334000	Accessory Electric Equipment	259,125	5,798	0	0	0	0	264,923
335	10335000	Miscellaneous Power Plant Equipment	58,876	757	0	0	0	-140	59,494
	Total		5,844,671	240,574	0	22,717	10,016	-140	6,052,372
Other									
341	10341000	Structures & Improvements	9,347,896	677,156	0	34,506	8,198	-62,265	9,920,083
342	10342000	Fuel Holders, Producers & Accessories	4,627,059	397,419	0	0	0	90,391	5,114,869
344	10344000	Generators	121,522,967	11,348,638	0	1,684,962	580,936	6,498	130,612,205
344	10344010	Photovoltaics - CIP Equipment	306,139						306,139
345	10345000	Accessory Electric Equipment	8,177,468	834,021	0	0	0	0	9,011,489
346	10346000	Miscellaneous Power Plant Equipment	2,147,823	149,745	0	0	0	-39,998	2,257,570
	Total		146,129,352	13,406,978	0	1,719,468	589,134	-5,373	157,222,355
Utility Total			2,644,323,309	142,495,729	475,503	160,363,857	22,291,348	-917,431	2,603,721,905

Xcel Energy
2007 Analysis of Depreciation Reserve
Gas Utility

FERC Account	Utility Account	Account Description	Beginning Balance	Credits		Debits		Transfers Adjustments and Other Credits (Debits)	Ending Balance
				Accruals	Gross Salvage	Retirements	Cost of Removal		
Production									
305	20305000	Structures & Improvements	2,182,949	105,200	0	0	0	0	2,288,149
311	20311000	LP Gas Equipment	9,257,732	336,134	0	0	0	-93,713	9,500,154
320	20320000	Other Equipment	608,928	16,185	0	0	0	0	625,113
	Total		12,049,609	457,520	0	0	0	-93,713	12,413,416
Storage									
361	20361000	Structures & Improvements	4,313,125	125,456	0	0	0	0	4,438,581
362	20362000	Gas Holders	6,713,363	147,262	0	0	0	0	6,860,625
363	20363000	Purification Equipment	1,059,509	20,602	0	51,832	-41,606	0	1,069,885
363.1	20363100	Liquefaction Equipment	1,655,687	156,743	0	0	0	0	1,812,430
363.2	20363200	Vaporizing Equipment	3,163,400	231,847	0	0	0	0	3,395,247
363.3	20363300	Compressor Equipment	3,767,413	48,666	0	0	0	0	3,816,079
363.4	20363400	Measuring & Regulating Equipment	39,599	435	0	0	0	0	40,034
363.5	20363500	Other Equipment	2,775,331	76,374	0	54,976	0	0	2,796,728
	Total		23,487,427	807,385	0	106,808	-41,606	0	24,229,610
Utility Total			35,537,036	1,264,905	0	106,808	-41,606	-93,713	36,643,026

Xcel Energy
2007 Summary of Annual Depreciation Accruals
Electric Utility

FERC Account	Utility Account	Account Description	Beginning Plant Balance	Est. Future Net Salvage %	Est. Future Net Salvage Amount	Beginning Depreciation Reserve	Net Balance	Depr Life (Yrs)	Annual Accrual	Depr Rate	Reserve Ratio
Steam											
311	10311000	Structures & Improvements	338,094,109	-26.7%	-90,271,127	277,424,522	150,940,714	12.3	13,883,560	N/A	64.76%
312	10312000	Boiler Plant Equipment	1,006,053,077	-0.3%	-3,018,159	700,111,501	308,959,735	15.5	39,370,663	N/A	69.38%
314	10314000	Turbogenerator Units	247,599,148	-0.5%	-1,237,996	183,739,196	65,097,948	14.2	8,640,992	N/A	73.84%
315	10315000	Accessory Electric Equipment	141,293,455	-0.3%	-421,428	103,515,822	38,199,062	14.1	4,824,162	N/A	73.05%
316	10316000	Miscellaneous Power Plant Equipment	58,122,278	-0.4%	-235,759	41,090,030	17,268,007	9.1	1,829,869	N/A	70.41%
	Total								68,549,246		
Nuclear											
302	10302002	Franchises & Consents	0	0%	0	0	0	22.8	576,342	N/A	0.00%
321	10321000	Structures & Improvements	321,500,624	0%	0	256,006,816	65,493,808	10.5	7,028,924	N/A	79.63%
322	10322000	Reactor Plant Equipment	801,494,871	0%	0	507,494,644	294,000,227	7.7	36,547,490	N/A	63.32%
323	10323000	Turbogenerator Units	198,465,354	0%	0	148,098,255	50,367,099	8.6	5,633,745	N/A	74.62%
324	10324000	Accessory Electric Equipment	213,959,189	0%	0	165,299,415	48,659,774	7.4	5,990,196	N/A	77.26%
325	10325000	Miscellaneous Power Plant Equipment	149,517,073	0%	0	109,569,087	39,947,986	8.1	4,522,234	N/A	73.28%
	Total								60,298,930		
Hydro											
302	10302001	Franchises & Consents	0	0%	0	0	0	26.2	61,574	N/A	0.00%
331	10331000	Structures & Improvements	545,449	-30.0%	-163,635	579,615	129,468	26.2	4,486	N/A	81.74%
332	10332000	Reservoirs, Dams & Waterways	6,119,879	-30.0%	-1,835,964	3,848,337	4,107,505	26.2	154,320	N/A	48.37%
333	10333000	Water Wheels, Turbines & Generators	1,128,023	-30.0%	-338,407	1,098,716	367,713	26.2	13,639	N/A	74.92%
334	10334000	Accessory Electric Equipment	266,037	-30.0%	-79,811	259,125	86,723	26.2	5,798	N/A	74.92%
335	10335000	Miscellaneous Power Plant Equipment	61,252	-30.0%	-18,376	58,876	20,752	26.2	757	N/A	73.94%
	Total								240,574		
Other											
341	10341000	Structures & Improvements	16,553,118	-22.3%	-3,691,345	9,347,896	10,896,567	15.3	677,156	N/A	46.18%
342	10342000	Fuel Holders, Producers & Accessories	10,049,919	-0.9%	-90,449	4,627,059	5,513,310	12.6	397,419	N/A	45.63%
344	10344000	Generators	350,533,451	-0.7%	-2,453,734	121,522,967	231,464,218	19.5	11,348,638	N/A	34.43%
345	10345000	Accessory Electric Equipment	25,359,968	-1.8%	-456,479	8,177,468	17,638,979	19.2	834,021	N/A	31.68%
346	10346000	Miscellaneous Power Plant Equipment	4,245,149	-2.9%	-122,026	2,147,823	2,219,352	13.7	149,745	N/A	49.18%
	Total								13,406,978		
Utility Total									142,495,729		

Xcel Energy
2007 Summary of Annual Depreciation Accruals
Gas Utility

FERC Account	Utility Account	Account Description	Beginning Plant Balance	Est. Future Net Salvage %	Est. Future Net Salvage Amount	Beginning Depreciation Reserve	Net Balance	Depr Life (Yrs)	Annual Accrual	Depr Rate	Reserve Ratio
Production											
305	20305000	Structures & Improvements	2,475,015	-8.0%	-198,001	2,182,949	490,068	5.1	105,200	N/A	81.67%
311	20311000	LP Gas Equipment	11,848,418	5.0%	596,278	9,257,732	1,994,408	4.9	336,134	N/A	82.28%
320	20320000	Other Equipment	688,192	0.3%	2,065	608,928	77,200	3.8	16,185	N/A	88.75%
	TOTAL								457,520		
Storage											
361	20361000	Structures & Improvements	4,719,382	-10%	-471,938	4,313,125	878,195	10.0	125,456	N/A	83.08%
362	20362000	Gas Holders	8,150,695	5%	407,535	6,713,363	1,029,797	10.0	147,262	N/A	86.70%
363	20363000	Purification Equipment	1,217,868	1%	12,179	1,059,509	146,181	10.0	20,602	N/A	87.88%
363	20363100	Liquefaction Equipment	2,805,986	2%	56,120	1,655,687	1,094,179	10.0	156,743	N/A	60.21%
363	20363200	Vaporizing Equipment	8,098,074	2%	161,961	3,163,400	4,772,713	20.0	231,847	N/A	39.86%
363	20363300	Compressor Equipment	4,191,917	2%	83,838	3,767,413	340,665	10.0	48,666	N/A	91.71%
363	20363400	Measuring & Regulating Equipment	45,363	6%	2,722	39,599	3,042	10.0	435	N/A	92.87%
363	20363500	Other Equipment	3,122,017	0%	0	2,775,331	346,686	10.0	76,374	N/A	88.90%
	Total								807,385		
Utility Total									1,264,905		

Xcel Energy
Resource Plan Comparison

Electric Utility

Electric Production Plant Facility	Proposed Depreciation Life on Current Investment	Resource Planning/ Modeling End of Life	Rationale for Difference Between Depreciation Life and Resource Planning Period
Black Dog 3 & 4	5	5	With the possible opportunity for repowering within the 2013-2015 timeframe, current investment plus maintenance and future capital expenditures should keep these assets providing the expected capacity through the 15 year planning period. However, the repowering opportunity is still under review.
High Bridge (Steam Plant)	0	0	Upon completion of the High Bridge steam production portion of the overall MERP project, this plant was taken out of service in August 2007 and fully depreciated in 2007.
High Bridge (Other Production)	30	39	Estimated in-service date is May 1, 2008. Depreciable life will push out beyond the 15 year resource planning period once the new combined cycle natural gas plant is completed. Proposed remaining book life for High Bridge will be 30 years. However, the Resource Plan model uses a 39 year study period. As both the proposed depreciation life and study period are beyond the 15 year Resource Planning Period, we see no need for further reconciliation at this time.
Allen S. King	29.5	39	In-service date for the rebuilt plant was July 15, 2007 with an approved remaining life of 30 years from the in-service date. The Resource Planning period is 15 years. However, the model used in Resource Planning uses a 39 year study period. As both the 30 book life and modeling process extend well beyond the Planning Period, we see no need for further reconciliation at this time.
Minnesota Valley	9.5	0	A 12.5 year -70% net salvage recovery of demolition cost was approved in Docket No. E,G002/D-05-288 effective 1/1/2005. While the site is still considered of value, we did not include this unit in the Resource Plan, as we are not receiving capacity from this plant and thus did not consider it a resource.
Red Wing	5	5	Depreciation life for the current investment is tied to a contract to burn refuse-derived fuel (RDF). The Company has entered into a new "Refuse Derived Fuel Supply Agreement" effective 1/1/2007 for an initial term of 6-years with a "follow-on term" of 5-years. With this new supply agreement, the depreciation recovery period will support the planning period. As options are exercised the remaining life will be re-evaluated.
Riverside Unit 7	1.6	0	As part of the MERP, depreciable life will push out beyond the capacity planning period once a portion of the existing coal plant is repowered with a combined cycle natural gas plant.
Riverside Unit 8	0.9	0	See Riverside Unit 7 above.
Sherco 1 & 2	15	39	Planning upgrades include capacity increases of approximately 80 MW for the 2012-2013 timeframe. For planning purposes it was anticipated that the capacity upgrades would extend the life well beyond the 15 year Resource Planning Period making the end of life close enough to the end of the 39 year Study Period to continue plant operation throughout the study time frame.
Sherco 3	15	39	See Sherco 1 & 2 above.
Wilmarth	5	5	See Red Wing above.
Monticello	22.8	22	Approved in 2006, a Certificate of Need for the spent fuel storage required to operate the plant an additional 20 years beyond 2010 became effective June 1, 2007. In June 2007, NSP-Minnesota filed for depreciation life extension of the plant based on previous NRC and MPUC process approvals. The 20-year depreciation life extension until September 2030 was granted by the MPUC on Sept. 21, 2007.

Xcel Energy
Resource Plan Comparison

Electric Utility

Electric Production Plant Facility	Proposed Depreciation Life on Current Investment	Resource Planning/ Modeling End of Life	Rationale for Difference Between Depreciation Life and Resource Planning Period
Prairie Island	6.3	24	Resource planning analysis was done to examine the impacts of closing the plant at end of license and operating beyond 2014. Preparations are underway for the submission of a license extension request to the NRC. The operating license extension for an additional 20 years of operation is anticipated to be filed in 2008 with the NRC. A spent fuel storage Certificate of Need application would be made contemporaneously.
Hennepin Island	26.2	39	The depreciation period is tied to the FERC operating license which extends the life well beyond the planning period.
Angus C. Anson Unit 2 & 3	11.8	13	The depreciation life is shorter to assure the current investment is recovered in the event a new asset is put in place of the existing one. Either way, the capacity at this site will be maintained.
Angus C. Anson Unit 4	27.4	27	Unit 4 was given a 30.4 year life as a new unit in 2005.
Black Dog 5	24	24	Unit 5 was given a 30 year life as a new unit in 2002.
Blue Lake Unit 1 thru 4	5	22	See Granite City below.
Blue Lake Unit 7 & 8	27.4	27	Units 7 & 8 were given 30.4 year lives as new units in 2005.
Grand Meadow Wind Farm	25	25	Minnesota's Renewable Energy Standard (RES) is requiring the Company to serve 30 percent of retail electric sales through renewable energy sources by 2020, with at least 25 percent of that generated by wind energy. This large wind energy conversion system (Grand Meadow Wind Farm 100 MW Project) will be the first project eligible under a proposed RES Rider with an estimated in-service of November 2008.
Granite City	5	10	Under operational review to decide if the current asset will supply the needed capacity through maintenance and capital expenditures or if a new asset will take its place. Either way, the capacity at this site will be maintained. The depreciation life is shorter to assure the current investment is recovered in the event a new asset is put in place of the existing one. Possible life extension peaking facility with modest capital investments.
Inver Hills	9	39	Valued as a tier one (top performing) peaking plant, current (intermediate) life and planned capital expenditures along with system reliability will keep these assets providing the expected capacity through the 15 year planning period and beyond.
Key City	5	5	See Granite City above.
West Faribault	0	0	Fully depreciated in 2006 and removed from the energy fleet. Disposition of the plant under review.

CERTIFICATE OF SERVICE

I, Nancy A. Haley, hereby certify that I have this day served copies or summaries 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-08-_____

Dated this 19th day of February 2008

_____

In the Matter of Xcel Energy 2007 Annual Review of Remaining Lives

E,G002/D-07-251
7-11-07

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Snavely King Majoros O'Connor & Lee
National Study of U.S. Steam Generating Unit Lives
50 MW and Greater
2006 Update

I. Introduction

Snavely King Majoros O'Connor & Lee, Inc. ("Snavely King") performed a study of U.S. Steam Generating Units Lives, 50 MW and Greater using analytical techniques generally accepted in the utility industry and a database maintained by the U.S. Department of Energy ("DOE"). Snavely King concludes that the lives of the U.S. Steam Generating Units (50 MW and Greater) are experiencing average life spans of approximately 60 years and these spans are lengthening almost on a year-to-year basis.

II. Database

The DOE's Energy Information Administration ("EIA") requires every owner of an electric utility generating plant to file a Form 860 describing the status of its generating facilities. From these reports, EIA maintains data on the installation and retirements of generating units around the country.

The data utilized in this study is available on the EIA's web site. The primary data used in Snavely King's study is located in the Form 860 database files[1]. The data was downloaded in several steps into a single Microsoft Access file and developed into inputs for Snavely King's actuarial analysis program.

III. Analysis

Snavely King initially study ("1999 Study") conducted a full band (1918-1999) resulting in a 54 L4 life and Iowa curve indication. Snavely King's initial ten-year band resulted in a 59 L4 indication and its initial rolling and shrinking band analysis showed trends toward longer lives – as long as 70 years.

Snavely King's 2000 update ("2000 Update") consisted of an analysis of the full band (1900-2000) and the most recent ten-year band (1991-2000) of data. The full band analysis had a best fit result of 60.5 L3, which indicates a 60 year life. The ten-year band best fit was a 59.5 R4, which indicates a 59 year life.

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[1] Prior to 2001, the EIA Form-860 Database was split two parts, Form-860A (Annual Electric Generator Report – Utility) and Form-860B (Annual Electric Generator Report – Nonutility). After 2001 the EIA combined Form-860A and Form-860B in a single Form-860 database. During the consolidation of the two Form-860 databases, the EIA removed all listed retirements in the 2000 database. From 2001 onwards, the Form-860 database started listing new retirements and re-classification of generating units that retired prior to 2001. In some cases plants that where classified as operable during 2000 Study, but in fact had been retired where reclassified as retried in the EIA data after 2000

Snavely King's 2006 update ("2006 Update") consisted of an analysis of the full band (1900-2006) and the most recent ten-year band (1997-2006) of data. The full band analysis had a best fit result of 59 S3, which indicates a 59 year life. The ten-year band best fit was a 58 R4, which indicates a 58 year life.

IV. Additional Analyses

Additional analyses were performed: an expanded full band analysis, rolling band analysis and a shrinking band analysis. The results are discussed and set forth in tabular form below.

Expanded Full band Analysis

The expanded full band analysis held the initial year constant, but used cut off dates of 2005, 2004, 2003, and 2002. The actuarial analyses yielded the following results:

Expanded Full Band Analysis

Band	Life	Curve Type
1900-2006	59	S3
1900-2005	59	S3
1900-2004	59	S3
1900-2003	58	S3
1900-2002	58	S3

Rolling Band Analysis

The ten-year band analyses for these data sets provided a "rolling band" analysis. The results are summarized in the table below:

Rolling Band Analysis

Band	Life	Curve Type
1997-2006	58	R4
1996-2005	58	R4
1995-2004	58	R4
1994-2003	57	R4
1993-2002	58	L5

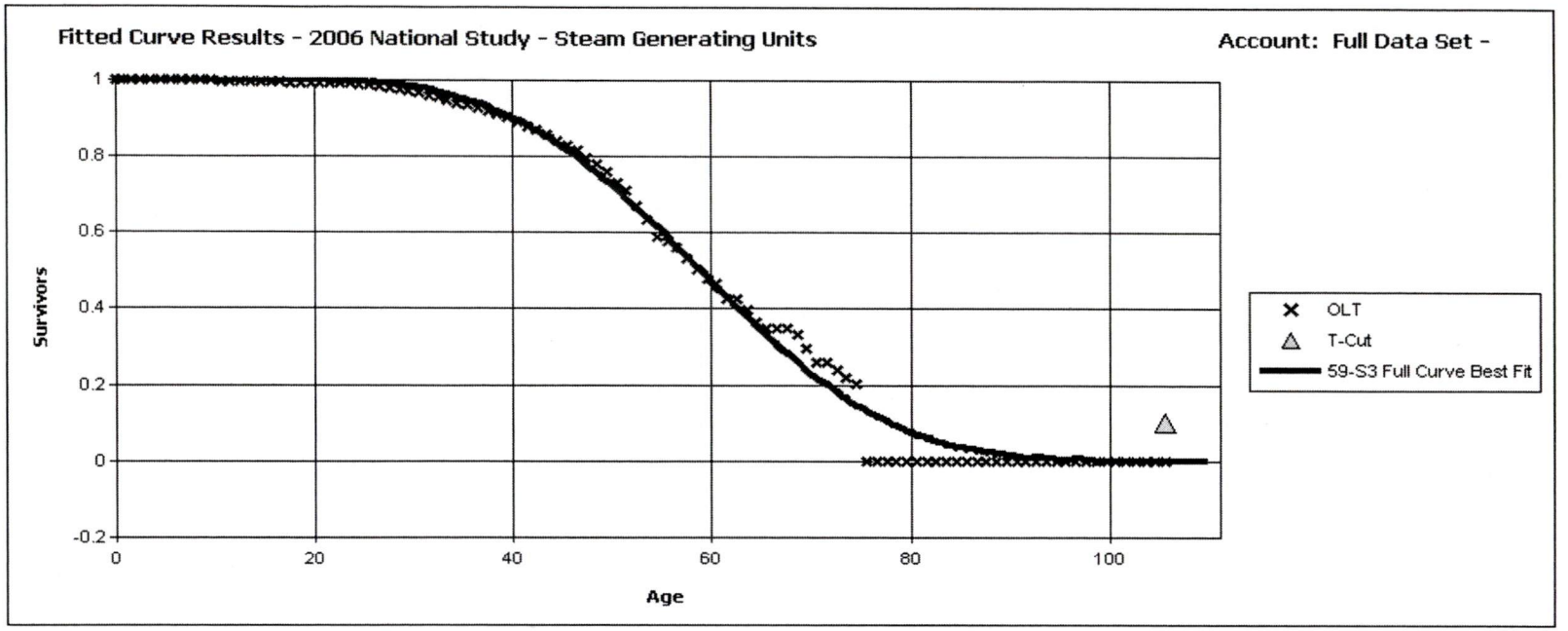
This indicates an increase in lives of generating units probably coincident with the wide spread introduction of life extension programs and the reduction in investment by utilities in new base load generating units.

Shrinking Band Analysis

Finally, Snavely King did a "shrinking band" analysis, in which the final 2000 year was held constant and the bands were continually shrunk.

Band	Width	Life	Curve Type
2002-2006	5	58	S4
1997-2006	10	58	R4
1992-2006	15	58	R4
1987-2006	20	58	R4
1982-2006	25	57	R4

The shrinking band analysis corroborated earlier results and conclusions.



Analytical Parameters

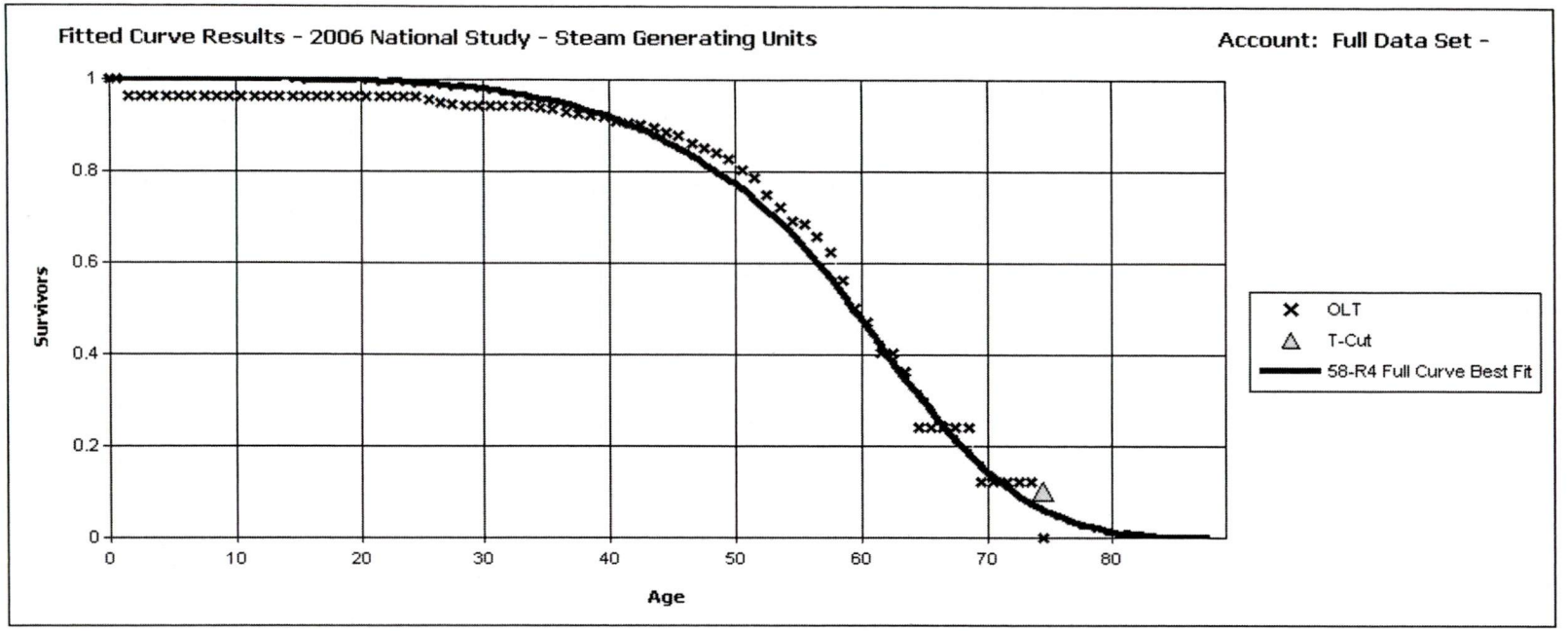
OLT Placement Band:	1900 - 2006
OLT Experience Band:	1900 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	107.0

Best Fit Curve Results
2006 National Study - Steam Generating Units
Account: Full Data Set -

Curve	Life	Sum of Squared Differences
BAND	1900 - 2006	
S3	59.0	1,088.993
R3	58.0	1,191.623
R4	59.0	1,842.609
L4	60.0	1,933.157
R2.5	57.0	2,626.642
S4	60.0	2,945.066
S2	58.0	3,001.689
L3	60.0	4,685.997
L5	60.0	4,792.597
R2	56.0	5,141.857
S1.5	58.0	5,291.768
R5	60.0	6,978.197
S1	57.0	8,361.511
S5	60.0	8,635.656
R1.5	56.0	9,091.594
L2	59.0	11,655.665
S0.5	56.0	12,302.955
R1	54.0	14,155.627
L1.5	59.0	16,081.760
S6	60.0	16,416.956
S0	55.0	17,076.547
L1	58.0	21,483.080
R0.5	53.0	22,014.134
S-0.5	54.0	23,821.165
L0.5	58.0	26,917.624
O1	52.0	31,608.441
L0	58.0	33,241.913
SQ	59.0	35,783.144
O2	59.0	37,211.949
O3	74.0	56,138.776
O4	99.0	64,407.355

Analytical Parameters

OLT Placement Band:	1900 - 2006
OLT Experience Band:	1900 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	107.0



Analytical Parameters

OLT Placement Band:	1900 - 2006
OLT Experience Band:	1997 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	76.0

Best Fit Curve Results
2006 National Study - Steam Generating Units
Account: Full Data Set -

Curve	Life	Sum of Squared Differences
BAND	1997 - 2006	
R4	58.0	796.154
S4	59.0	1,228.560
L4	60.0	1,494.655
L5	60.0	1,573.579
R5	59.0	2,125.630
S3	59.0	2,248.330
R3	58.0	2,462.917
S5	60.0	2,995.326
R2.5	57.0	4,342.245
L3	62.0	4,543.176
S2	59.0	5,019.473
S1.5	59.0	6,970.160
R2	57.0	7,113.019
S6	60.0	7,142.851
L2	64.0	9,293.844
S1	60.0	9,504.726
R1.5	57.0	10,377.269
L1.5	65.0	12,051.102
S0.5	60.0	12,178.976
R1	58.0	14,444.787
S0	61.0	15,416.168
L1	66.0	15,578.356
L0.5	69.0	18,269.739
R0.5	60.0	19,361.207
S-0.5	63.0	19,508.344
L0	72.0	21,379.899
SQ	60.0	22,819.938
O1	66.0	24,312.779
O2	74.0	24,356.264
O3	100.0	27,717.940
O4	100.0	38,084.137

Analytical Parameters

OLT Placement Band:	1900 - 2006
OLT Experience Band:	1997 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	76.0

Snavely King Majoros O'Connor & Lee
National Study of Other Production Unit Lives
2006 Study

I. Introduction

Snavely King Majoros O'Connor & Lee, Inc. ("Snavely King") performed a study of U.S. Other Production Unit Lives[1] using analytical techniques generally accepted in the utility industry and a database maintained by the U.S. Department of Energy ("DOE"). Snavely King concludes that the lives of the U.S. Other Production Units are experiencing average life spans of approximately 50 years.

II. Database and Methodology

The DOE's Energy Information Administration ("EIA") requires every owner of an electric utility generating plant to file a Form 860 describing the status of its generating facilities. From these reports, EIA maintains data on the installation and retirements of generating units around the country.

The data utilized in this study is available on the EIA's web site. The primary data used in Snavely King's study is located in the Form 860 database files. The data was downloaded in several steps into a single Microsoft Access file and developed into inputs[2] for Snavely King's actuarial analysis program.

III. Analysis

Snavely King's 2006 update ("2006 Update") consisted of an analysis of the full band (1915-2006) and the most recent ten-year band (1997-2006) of data. The full band analysis had a best fit result of 50 S0.5, which indicates a 50 year life. The ten-year band best fit was a 50 R0.5, which indicates a 50 year life.

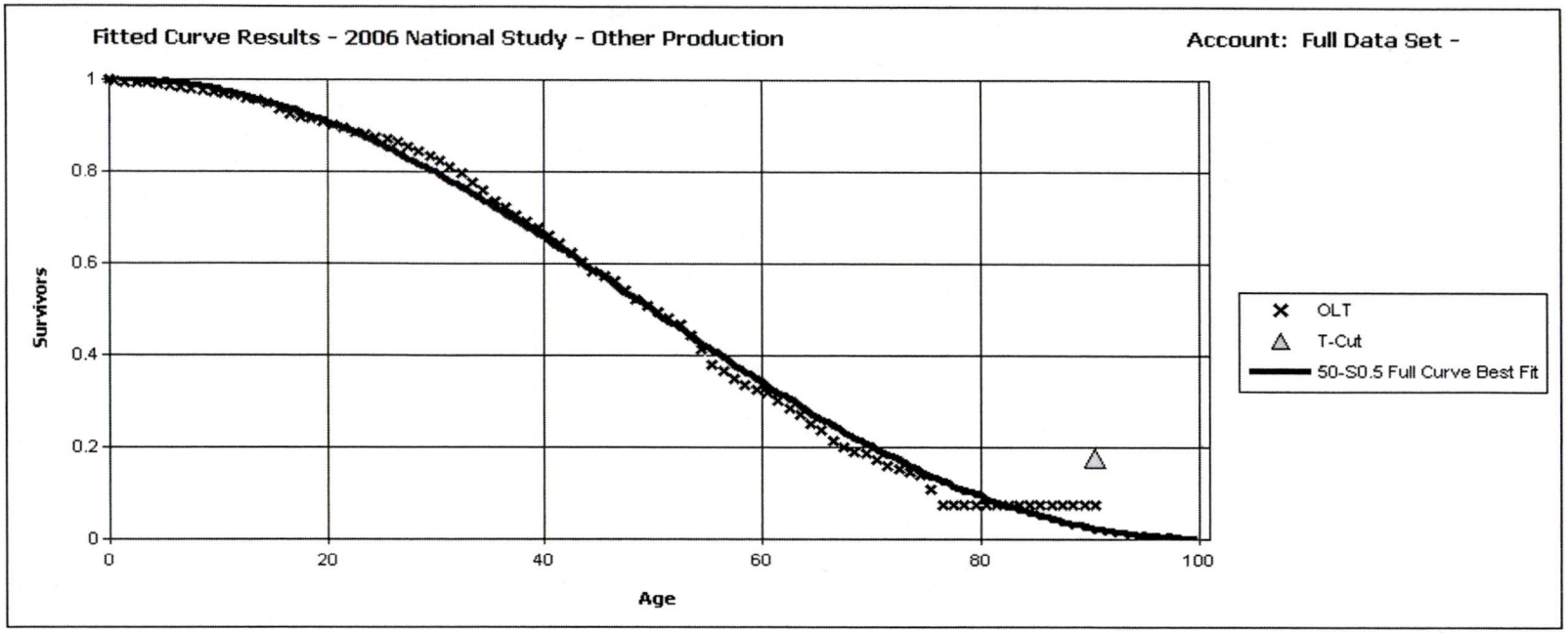
Finally, Snavely King preformed a "shrinking band" analysis, in which the final year was held constant and the bands were continually shrunk. The results are shown below.

Shrinking Band Analysis

Band	Width	Life	Curve Type
2002-2006	5	43	L0
1997-2006	10	50	R0.5
1992-2006	15	51	R1
1987-2006	20	50	R1
1982-2006	25	47	S0

[1] Other Production Units in this study are considered as Combusting (Gas) Turbines (including jet engine designs), Internal Combustion Engine (diesel, piston) and Combined Cycle Combustion Turbine generating units.

[2] Various sorts were made to refine the data and to remove bad data. For instance, some units listed as retired had no retirement dates indicated, etc.



Analytical Parameters

OLT Placement Band:	1915 - 2006
OLT Experience Band:	1915 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	92.0

Best Fit Curve Results
2006 National Study - Other Production
Account: Full Data Set -

Curve	Life	Sum of Squared Differences
BAND	**1915 - 2006**	
S0.5	50.0	400.971
S1	50.0	432.746
R1.5	49.0	525.805
L2	51.0	661.377
L1.5	51.0	904.554
R1	49.0	1,007.595
S0	49.0	1,179.115
S1.5	50.0	1,180.871
R2	50.0	1,299.153
L1	51.0	2,121.823
L3	51.0	2,678.501
S2	51.0	2,701.452
R0.5	48.0	2,805.946
R2.5	50.0	2,869.604
S-0.5	48.0	3,171.055
L0.5	51.0	3,847.943
R3	50.0	5,616.852
L0	51.0	6,339.838
O1	47.0	6,416.110
S3	51.0	7,191.810
O2	52.0	8,244.710
L4	51.0	9,160.698
R4	51.0	12,042.745
S4	51.0	15,052.133
O3	64.0	17,366.231
L5	51.0	17,474.300
R5	51.0	21,444.751
O4	84.0	21,905.574
S5	51.0	23,899.724
S6	51.0	32,433.821
SQ	51.0	51,452.552

Analytical Parameters

OLT Placement Band:	1915 - 2006
OLT Experience Band:	1915 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	92.0

Analytical Parameters

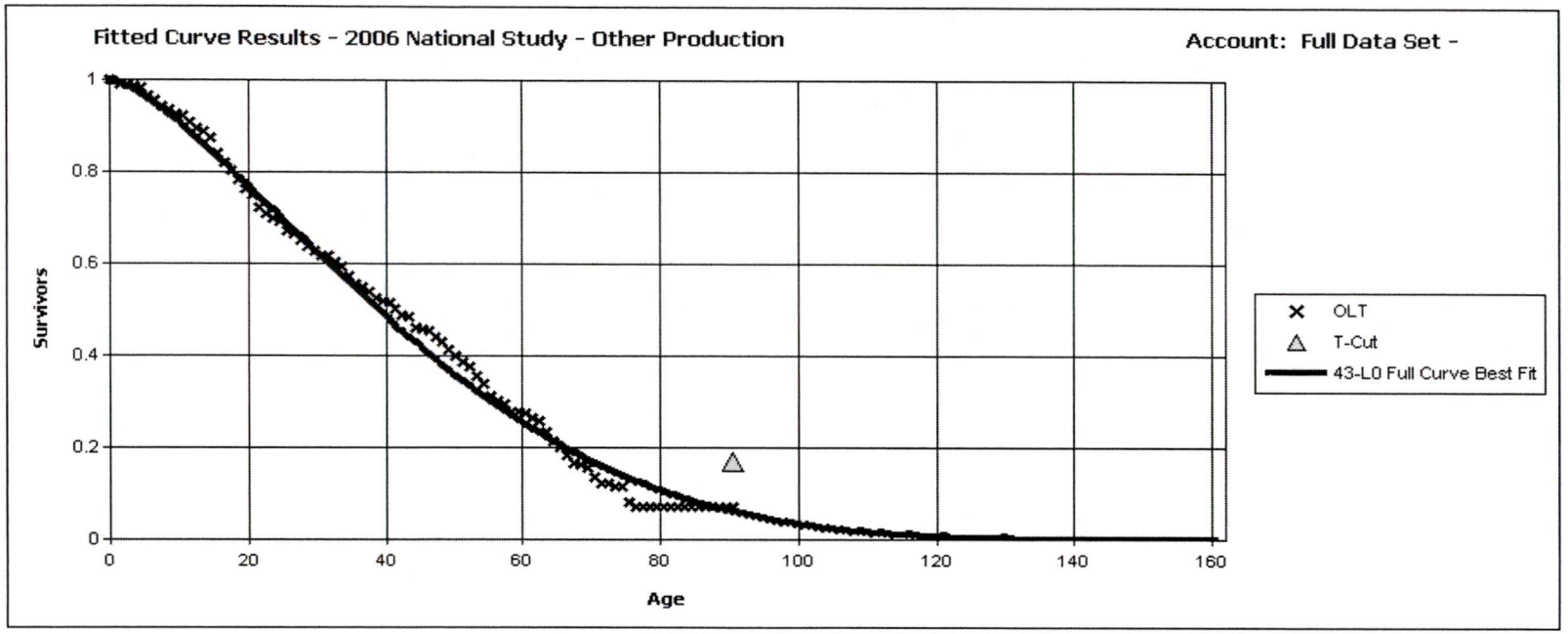
OLT Placement Band:	1915 - 2006
OLT Experience Band:	1997 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	92.0

Best Fit Curve Results
2006 National Study - Other Production
Account: Full Data Set -

Curve	Life	Sum of Squared Differences
BAND	1997 - 2006	
R0.5	50.0	609.859
S-0.5	50.0	921.382
R1	51.0	932.246
S0	51.0	1,085.767
L0.5	52.0	1,881.619
L1	52.0	1,884.621
O1	49.0	2,029.514
S0.5	52.0	2,076.028
R1.5	52.0	2,432.511
L0	53.0	2,635.341
L1.5	53.0	2,756.984
O2	54.0	3,251.048
S1	52.0	3,909.978
L2	53.0	4,591.942
R2	52.0	5,118.036
S1.5	53.0	6,264.151
R2.5	53.0	8,498.373
O3	66.0	9,217.495
S2	53.0	9,450.341
L3	54.0	10,237.454
O4	86.0	12,365.760
R3	53.0	13,069.801
S3	54.0	16,607.378
L4	54.0	19,655.879
R4	54.0	22,386.099
S4	54.0	27,068.849
L5	55.0	30,183.631
R5	55.0	34,679.860
S5	55.0	37,757.281
S6	54.0	47,537.233
SQ	54.0	67,057.979

Analytical Parameters

OLT Placement Band:	1915 - 2006
OLT Experience Band:	1997 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	92.0



Analytical Parameters

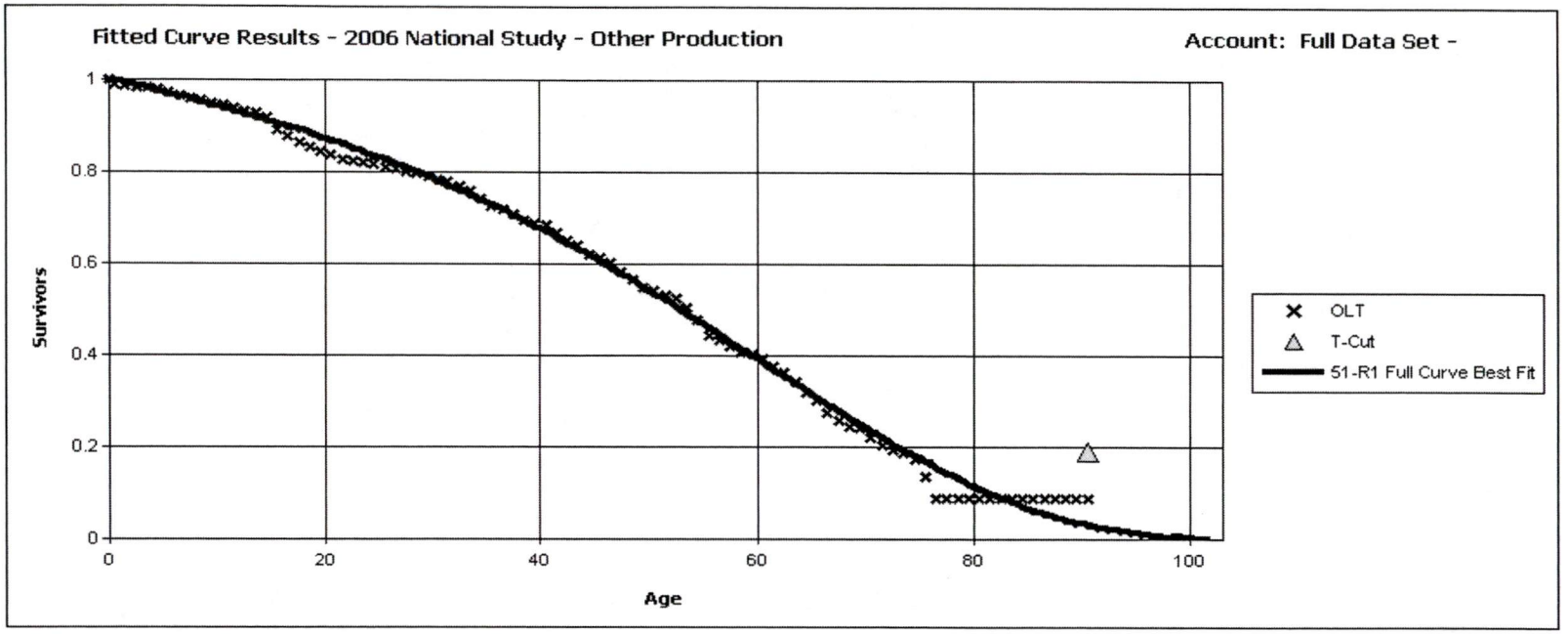
OLT Placement Band:	1915 - 2006
OLT Experience Band:	2002 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	92.0

Best Fit Curve Results
2006 National Study - Other Production
Account: Full Data Set -

Curve	Life	Sum of Squared Differences
BAND	2002 - 2006	
L0	43.0	570.514
L0.5	44.0	733.272
O1	42.0	807.800
S-0.5	43.0	1,073.940
O2	44.0	1,097.520
R0.5	43.0	1,364.704
L1	44.0	1,625.260
S0	43.0	2,514.163
R1	43.0	3,486.196
L1.5	44.0	3,540.542
S0.5	44.0	4,562.316
O3	51.0	6,013.842
R1.5	44.0	6,246.758
L2	44.0	6,338.362
S1	44.0	7,371.521
O4	64.0	9,798.844
R2	44.0	10,081.373
S1.5	44.0	10,660.152
L3	44.0	14,297.055
R2.5	44.0	14,369.717
S2	44.0	14,687.789
R3	44.0	19,693.366
S3	44.0	23,107.335
L4	44.0	25,940.554
R4	44.0	29,708.113
S4	44.0	34,177.292
L5	44.0	37,025.036
R5	44.0	41,663.706
S5	44.0	44,516.800
S6	43.0	53,411.639
SQ	42.0	70,413.367

Analytical Parameters

OLT Placement Band:	1915 - 2006
OLT Experience Band:	2002 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	92.0



Analytical Parameters

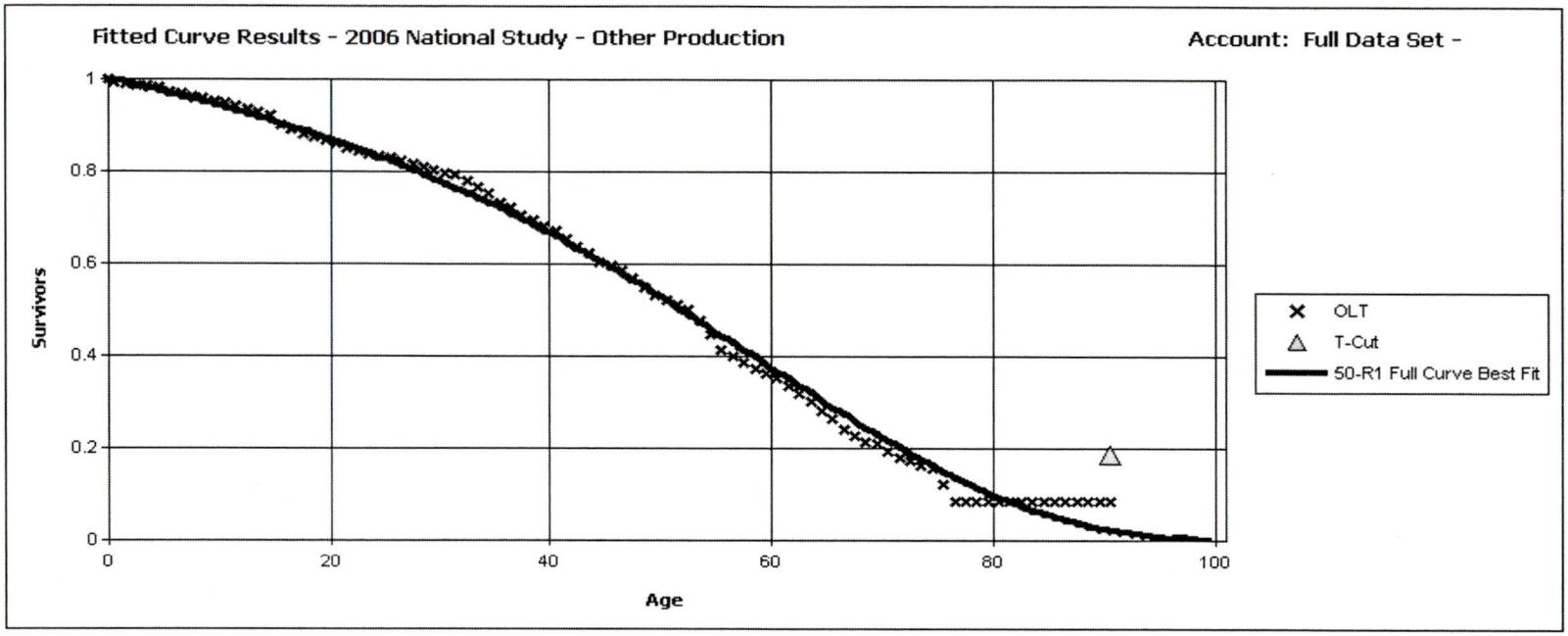
OLT Placement Band:	1915 - 2006
OLT Experience Band:	1992 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	92.0

Best Fit Curve Results
2006 National Study - Other Production
Account: Full Data Set -

Curve	Life	Sum of Squared Differences
BAND	**1992 - 2006**	
R1	51.0	373.338
S0	51.0	803.503
R1.5	52.0	932.509
S0.5	52.0	942.953
R0.5	50.0	1,169.078
S-0.5	50.0	1,635.602
L1.5	53.0	1,855.708
L1	53.0	1,932.967
S1	52.0	1,935.752
R2	52.0	2,651.549
L0.5	53.0	2,670.279
L2	53.0	2,769.720
S1.5	53.0	3,472.572
O1	49.0	3,723.966
L0	53.0	4,176.289
R2.5	53.0	5,175.949
O2	54.0	5,258.105
S2	53.0	5,852.621
L3	54.0	6,508.614
R3	53.0	8,858.409
S3	54.0	11,661.901
O3	67.0	12,537.541
L4	54.0	14,245.641
O4	88.0	16,145.723
R4	54.0	16,861.330
S4	54.0	20,824.962
L5	54.0	23,662.298
R5	54.0	27,915.173
S5	54.0	30,717.660
S6	54.0	40,053.065
SQ	54.0	59,379.950

Analytical Parameters

OLT Placement Band:	1915 - 2006
OLT Experience Band:	1992 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	92.0



Analytical Parameters

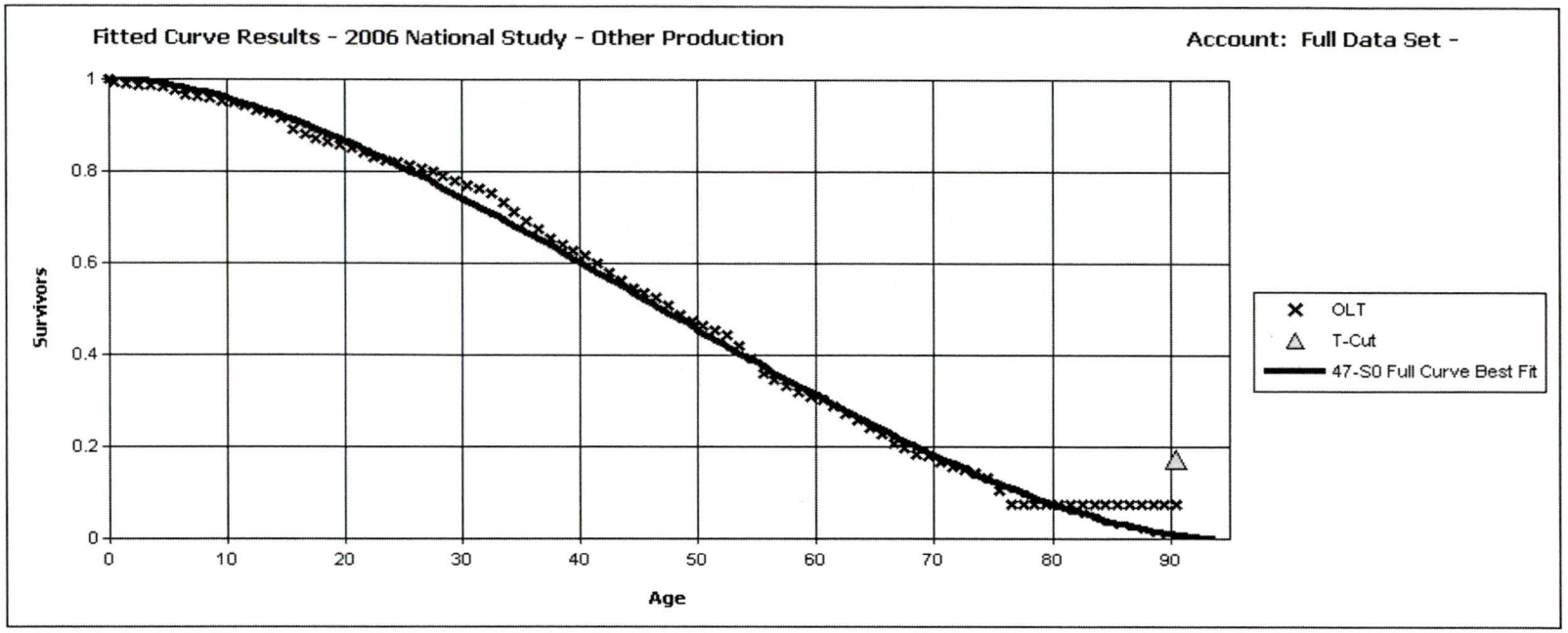
OLT Placement Band:	1915 - 2006
OLT Experience Band:	1987 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	92.0

Best Fit Curve Results
2006 National Study - Other Production
Account: Full Data Set -

Curve	Life	Sum of Squared Differences
BAND	**1987 - 2006**	
R1	50.0	407.076
S0.5	51.0	561.418
R1.5	50.0	600.198
S0	50.0	729.878
S1	51.0	1,217.407
L1.5	52.0	1,275.730
R0.5	49.0	1,502.486
L2	52.0	1,767.225
L1	52.0	1,767.358
S-0.5	49.0	1,928.851
R2	51.0	1,997.721
S1.5	52.0	2,479.248
L0.5	52.0	2,833.270
R2.5	51.0	4,194.343
O1	48.0	4,384.240
S2	52.0	4,523.014
L0	52.0	4,666.417
L3	53.0	4,875.081
O2	53.0	6,004.430
R3	52.0	7,470.060
S3	52.0	9,843.788
L4	53.0	12,106.296
O3	65.0	13,988.226
R4	52.0	14,856.560
O4	85.0	17,978.888
S4	53.0	18,388.649
L5	53.0	20,995.287
R5	53.0	25,112.445
S5	53.0	27,742.382
S6	52.0	36,631.534
SQ	53.0	55,655.989

Analytical Parameters

OLT Placement Band:	1915 - 2006
OLT Experience Band:	1987 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	92.0



Analytical Parameters

OLT Placement Band:	1915 - 2006
OLT Experience Band:	1982 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	92.0

Best Fit Curve Results
2006 National Study - Other Production
Account: Full Data Set -

Curve	Life	Sum of Squared Differences
BAND	1982 - 2006	
S0	47.0	436.315
R1	47.0	447.815
S0.5	48.0	558.954
L1.5	49.0	811.212
R0.5	46.0	992.633
L1	49.0	995.881
R1.5	48.0	1,067.941
S-0.5	47.0	1,209.038
L2	49.0	1,579.596
S1	48.0	1,585.670
L0.5	49.0	1,839.119
R2	48.0	2,856.566
S1.5	49.0	3,105.025
O1	46.0	3,246.618
L0	49.0	3,444.781
O2	50.0	4,794.791
R2.5	49.0	5,346.921
L3	50.0	5,397.725
S2	49.0	5,442.534
R3	49.0	8,899.024
S3	49.0	11,185.926
O3	60.0	12,830.068
L4	50.0	13,448.811
R4	49.0	16,545.762
O4	78.0	17,201.400
S4	49.0	20,048.824
L5	49.0	22,634.242
R5	49.0	26,792.613
S5	49.0	29,391.583
S6	49.0	38,145.975
SQ	48.0	56,837.585

Analytical Parameters

OLT Placement Band:	1915 - 2006
OLT Experience Band:	1982 - 2006
Minimum Life Parameter:	1
Maximum Life Parameter:	100
Life Increment Parameter:	1
Max Age (T-Cut):	92.0

Northern States Power Company
Summary of Recommended Adjustments
($Thousands)

Line	Adjustment	Source	Rate Base	Expenses	Revenue Requirement
1	Remove Rehabilitation of Allen Plant	Ex___(CWK-3)	(18,987)	(928)	
2	Adjust High Bridge for Alternative	Ex___(CWK-4)	(22,137)	(571)	
3	Remove Mercury Emissions Cost	PSC IR 3-4			(268)
4	Remove Refuse-Derived Energy	PSC IR 3-4			(173)
5	Remove RDF Contribution	PSC IR 3-4			(170)
6	Remove 25% of Grand Meadow Wind Farm	Testimony, p 12			(79)
7	Remove 25% of Transmission to Wind Farms	Testimony, p 12			(80)
8	Depreciation Adjustments	Ex___(CWK-7), Sch 1	4,115	(4,115)	