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April 7, 2017

**VIA ELECTRONIC MAIL & U.S. MAIL**

Darrell Nitschke, Executive Secretary  
North Dakota Public Service Commission  
600 East Boulevard, Dept 408  
Bismarck, ND 58505-0480

RE: INFORMATIONAL LETTER ON NUCLEAR DECOMMISSIONING ACCRUAL AND  
ESCROW FUND (CASE NO. PU-07-776)

Dear Mr. Nitschke:

Per provisions of the Settlement Agreement approved by the North Dakota Public Service Commission in its *Order Adopting Settlement* dated December 31, 2008 (Case No. PU-07-776), Northern States Power Company provides here its annual informational letter submitted to the Minnesota Public Utilities Commission (MPUC) regarding the Company's Nuclear Decommissioning Accrual.

Due to the voluminous nature of this report (in excess of 800 pages), the Company is providing the full report (including Attachments A.1, A.2, and A.3) on CD only via U.S. Mail. The MPUC filing letter and Attachment A are being provided via email and will be included on the CD; paper copies will gladly be provided if requested by the Commission or Staff. Please contact me at 701-241-8632, if you have any questions regarding this submission.

Sincerely,

A handwritten signature in blue ink that reads 'David H. Sederquist'.

DAVID SEDERQUIST  
SR. REGULATORY CONSULTANT

Enclosure



414 Nicollet Mall  
Minneapolis, MN 55401

April 3, 2017

—Via Electronic Filing—

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

RE: COMPLIANCE FILING-ANNUAL INFORMATIONAL LETTER  
NUCLEAR DECOMMISSIONING ACCRUAL  
DOCKET NO. E002/M-14-761

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this annual informational letter for the Nuclear Decommissioning Trust (NDT) fund.

Xcel Energy is required to review the financial parameters, funding methodology, and cost estimates for nuclear plant decommissioning every three years. Our most recent triennial review was filed on December 1, 2014 in Docket No. E002/M-14-761. Our next triennial review will be filed on December 1, 2017.

Between triennial filings, we are required to submit annual informational letters discussing nuclear decommissioning fund accruals as outlined below:

- The Commission's June 12, 2009 ORDER APPROVING DECOMMISSIONING PLAN, AS MODIFIED, AND REQUIRING REFUND PROPOSAL in Docket No. E002/M-08-1201 requires that our annual letter address the risk of premature decommissioning. No material changes have occurred in the risk or the risk mitigating coverage since we filed our triennial review in 2011, thus we have no updated information to report in this letter.

- The Commission’s Orders in prior triennial dockets<sup>1</sup> require that our annual letter include an external fund evaluation and information on fund performance and balances, including:
  - a) The total annual return on the Fund;
  - b) The total annual return on the Company’s benchmark portfolio for the same period ; and
  - c) The asset allocation by category (i.e., Small Cap, Large Cap, etc.).
  
- The Commission’s February 27, 2017 ORDER DIRECTING XCEL TO ANALYZE FUND INVESTMENTS AND RETAIN OUTSIDE EXPERT in Docket No. E002/M-14-761 requires that our annual compliance filing include the following information:
  - a) The average annual return on –
    - 1) the Nuclear Decommissioning Trust Fund (NDT) portfolio, including and the return on each individual asset;
    - 2) the Standard & Poor’s 500 stock market index;
    - 3) 10-year treasury notes;
    - 4) other qualified nuclear decommissioning trust funds;
    - 5) any other benchmarks proposed by Northern States Power Company d/b/a Xcel Energy, or jointly by Xcel and the Minnesota Department of Commerce;
    - 6) Vanguard Exchange-Traded Funds (ETFs) invested according to the Charles Schwab Moderately Aggressive Asset Allocation as set forth below; and:

Fund Name	Weight
Vanguard Large Cap ETF	45%
Vanguard Small Cap ETF	15%
Vanguard Total World Stock ETF	20%
Vanguard LT Corporate Bond ETF	20%

- b) calculated over the five-, ten-, and twenty-year periods ending in the calendar year preceding the filing.

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<sup>1</sup> See e.g., April 17, 2000 ORDER DETERMINING DECOMMISSIONING COSTS, APPROVING COST RECOVERY PROCEDURES, AND ESTABLISHING FUTURE FILING REQUIREMENTS in Docket No. E002/M-99-1438; and September 24, 2012 ORDER in Docket No. E002/M-11-1184.

The attachments to this letter, listed below, provide the required information related to the annual accrual and fund status:

- Attachment A: External Fund Evaluation
  - A.1: Monticello Qualified Fund
  - A.2: Prairie Island Unit 1 Qualified Fund
  - A.3: Prairie Island Unit 2 Qualified Fund

Finally, we note that in compliance with the Commission's February 27, 2017 Order in Docket No. E002/M-14-761, we will submit an additional compliance filing later this year. Specifically, the Order requires the Company to submit a filing within six months of the Order that contains the following:

- Xcel shall re-evaluate its investment mix with the purpose of reducing the NDT's investment management fees and increasing the annual return on its investment portfolio.
- Xcel shall retain a third-party expert in long-term institutional investment strategies to evaluate Xcel's investment strategy with respect to the NDT with a goal of assuring sufficient funding to meet the decommissioning obligations at the time they are expected to come due and maximize return from the investment consistent with the appropriate risk level. The expert shall file a report on the matter with the Commission within six months of this order.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact me at (612) 330-6950 or [lisa.h.perkett@xcelenergy.com](mailto:lisa.h.perkett@xcelenergy.com) if you have any questions regarding this filing.

Sincerely,

/s/

LISA H. PERKETT  
PRINCIPAL FINANCIAL CONSULTANT

Enclosures  
c: Service List

**XCEL ENERGY**  
**EXTERNAL FUND EVALUATION**  
**MARCH 2017**

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**A. Summary**

Per the Commission's Orders beginning with Docket No. E002/D-86-604 and through subsequent dockets, Xcel Energy is required to review the financial parameters, the funding methodology, and cost estimate for the Nuclear Decommissioning Trust (NDT) fund every three years. The most recent triennial review was submitted at the end of 2014. The next triennial review will be submitted at the end of 2017. In between triennial filings, Xcel Energy submits an Annual Informational Letter providing fund balances and historical performance as of December 31 of each year. That information is provided below.

We note that the Commission's October 5, 2015 ORDER APPROVING NUCLEAR DECOMMISSIONING STUDY, ASSUMPTIONS, AND ANNUAL ACCRUAL, AND SETTING FILING REQUIREMENTS in Docket No. E002/M-14-761 (October 5, 2015 Order) required the Company to discontinue the Escrow Fund and to pour over the balance to the Qualified Trust Fund. The Company completed the pour over in 2016, resulting in a zero balance for the Escrow fund as of December 31, 2016. Consequently, no information is provided below for the Escrow Fund.

**B. Fund Balances**

In the 2014 triennial filing, the Commission approved an accrual based on a 60-year decommissioning scenario. In 2016, the Company deposited \$14.0 million into the Qualified Trust Fund for the Minnesota jurisdiction. The following are the Minnesota jurisdictional balances at book value as of December 31, 2016:

**Table 1**  
**Book Value as of December 31, 2016**  
**Minnesota Jurisdictional Balances**

<b>Qualified Trust Fund</b>	<b>Ending Balance</b>
Monticello	\$ 504,432,968
Prairie Island Unit 1	292,599,639
Prairie Island Unit 2	331,992,382
Total	\$ 1,129,024,989

Performance is reviewed for the funds in their entirety. Therefore, all additional information provided below is for total Company (NSPM).

For accounting purposes, Xcel Energy records the actual purchase price of the investments. Quarterly, a market value adjustment journal entry is made to book any unrealized gains or losses to special regulatory accounts per Statement of Financial Accounting Standards No. 115, Accounting for Certain Investments in Debt and Equity Securities. The difference between market and book values represents the unrealized gains or losses. The unrealized gain in the qualified fund as of December 31, 2016 is \$331.7 million. In addition it should be noted that trustee fees, investment management fees, and income taxes also are paid from these funds, thereby impacting overall fund performance. Tables below show the breakdown in the Qualified Trust Fund.

**Table 2**  
**Summary of Qualified Trust Fund**  
**From March 15, 1991 to December 31, 2016**

	Total Fund	Monticello	Prairie Island Unit 1	Prairie Island Unit 2
Market Value at 03/15/1991	-	-	-	-
Contributions/Transfers	1,196,721,280	561,478,884	298,647,352	336,595,044
Market Value at 12/31/2016	1,860,761,514	811,682,802	494,108,690	554,970,023
Increase in Market Value	664,040,234	250,203,918	195,461,338	218,374,979

**Table 3**

**Market Value Change by Component  
From March 15, 1991 to December 31, 2016**

	<u>Total Fund</u>	<u>Monticello</u>	<u>Prairie Island Unit 1</u>	<u>Prairie Island Unit 2</u>
Interest/Dividends	529,785,700	196,542,211	159,441,772	173,801,718
Realized Gains/(Losses)	14,764,851	3,622,837	5,083,151	6,058,862
Management Fees	(54,310,665)	(20,449,039)	(16,322,550)	(17,539,077)
Trustee Fees	(6,522,869)	(2,312,981)	(2,084,653)	(2,125,235)
Income Taxes	(151,401,886)	(54,780,618)	(48,385,393)	(48,235,875)
Unrealized Gains/(Losses)	<u>331,725,104</u>	<u>127,581,507</u>	<u>97,729,010</u>	<u>106,414,586</u>
Increase in Market Value	664,040,234	250,203,918	195,461,338	218,374,979

**Table 4**

**Summary of Qualified Trust Fund  
From January 1, 2016 to December 31, 2016**

	<u>Total Fund</u>	<u>Monticello</u>	<u>Prairie Island Unit 1</u>	<u>Prairie Island Unit 2</u>
Market Value at 12/31/2015	1,724,018,182	743,555,677	465,131,530	515,330,976
Contributions/Transfers	<u>20,499,685</u>	<u>18,390,820</u>	<u>486,424</u>	<u>1,622,441</u>
Total	1,744,517,867	761,946,497	465,617,954	516,953,417
Market Value at 12/31/2016	<u>1,860,761,514</u>	<u>811,682,802</u>	<u>494,108,690</u>	<u>554,970,023</u>
Increase in Market Value	116,243,647	49,736,305	28,490,736	38,016,606

**Table 5**

**Market Value Change by Component  
From January 1, 2016 to December 31, 2016**

	<u>Total Fund</u>	<u>Monticello</u>	<u>Prairie Island Unit 1</u>	<u>Prairie Island Unit 2</u>
Interest/Dividends	34,303,700	14,477,536	9,436,073	10,390,091
Realized Gains/(Losses)	(733,107)	(289,056)	(258,518)	(185,533)
Management Fees	(6,160,298)	(2,549,167)	(1,736,622)	(1,874,510)
Trustee Fees	(273,608)	(91,354)	(91,140)	(91,114)
Income Taxes	(14,102,158)	(5,375,999)	(7,550,548)	(1,175,611)
Unrealized Gains/(Losses)	<u>103,209,117</u>	<u>43,564,345</u>	<u>28,691,490</u>	<u>30,953,282</u>
Increase in Market Value	116,243,647	49,736,305	28,490,736	38,016,606

Consistent with IRS rules, the investments to the Qualified Trust Fund are maintained by generating unit, thus earnings are shown separated by unit. Except for the contribution, BNY Mellon prorates the remaining items in the fund on a monthly basis to each jurisdiction. The BNY Mellon bank statements for December 31, 2016 are included in

Attachment B; Monticello is shown in B.1, Prairie Island Unit 1 in B.2, and Prairie Island Unit 2 in B.3.

### **C. Trustee**

BNY Mellon is the trustee for Xcel Energy's external nuclear decommissioning funds, the Qualified Trust Fund (Escrow Fund was closed in 2016). The primary duty of the trustee for the funds is the safe custody of its assets including handling the settlement of all purchases and sales, whether placed by the trustee or by an independent investment manager. The trustee has limited investment duties other than the responsibility for keeping cash balances temporarily invested. Other duties include paying income taxes on the earnings of the Qualified Trust Fund paying invoices for services for the trust and investment managers, conducting investment performance reporting, and keeping accurate records of all of its activities with respect to the fund.

### **D. Investment Managers**

Xcel Energy has retained Goldman Sachs to assist the Company in establishing investment policy for the Funds. In 2016, the list of investment managers was reduced to eight covering ten asset categories. As of December 2016, the asset managers and their mandates are as follows:

- First Principles Capital Management manages the domestic investment grade fixed income component.
- Parametric Portfolio Advisors, a subsidiary of Eaton Vance Investment Managers, manages the assets of the U.S. equity and non-U.S. developed market equity components of the Qualified Trust. Parametric utilizes tax-efficient strategies within these portfolios to mitigate tax impacts with respect to the whole trust.
- Parametric Portfolio Advisors also manages the emerging market equity allocation through an Eaton Vance tax aware mutual fund.
- Shenkman Capital Management manages the assets of the high yield fixed income component.
- Wellington Management Company manages the assets of the emerging markets fixed income component.
- Titan Advisors and Magnitude Capital manage the assets of the hedge funds component.

- The Townsend Group manages the assets of the real estate component.
- StepStone Group manages the assets of the private equity component.
- CoreCommodity manages the assets of the commodities component.

**E. Historical Performance**

The Qualified Trust Fund investment returns are measured relative to a total portfolio benchmark that represents the total weighted average impact of the underlying individual asset classes. This benchmark provides a single data point by which the total portfolio’s performance can be measured on a relative basis.

Yearly returns reflect short-term factors, but the focus of the investments is to achieve long-term returns and not the year-by-year results. The total Qualified Trust performance relative to its weighted average Qualified Trust benchmark for the time the current strategy and asset allocation has been in place or in the process of being implemented is as follows:

**Table 6**  
**NDT Qualified Trust Performance (Net of fees)**

	Annualized Returns			
	1 Year	3 Year	5 Year	1/1/2009 to12/31/2016
Total Qualified Trust Fund	7.67%	4.38%	7.29%	8.41%
Qualified Trust Fund Benchmark*	8.38%	3.31%	6.01%	7.12%

\*Total Qualified trust benchmark is the approximate weighted average of the individual asset class benchmarks.

Annualized returns represent the annual return earned each year when considering the effects of compounding. Thus, any annualized difference in return between a portfolio and its benchmark over a 5-year time horizon can be interpreted as the annual difference for each of the five years.

**F. Asset Allocation**

The asset allocation is reviewed at least annually by the NDT Committee. Changes to the asset allocation are made periodically as warranted. As of December 31, 2016, the current allocation versus target was as follows:

**Table 7**

<b><u>Xcel NDT</u></b>			
	<b>12/31/2016</b>	<b>2016 Target Allocation</b>	<b>Benchmark</b>
<b>Equities</b>			
US Equities	26%	24%	Russell 3000
Non-US Equity - EAFE	18%	19%	MSCI EAFE ND
Non-US Equity - EM	7%	7%	MSCI EM ND
<b>Total Equities</b>	<b>51%</b>	<b>50%</b>	<b>Weighted average equity benchmark</b>
<b>Fixed Income</b>			
US Investment grade	5%	5%	Custom US corporate and inflation benchmark
High Yield	5%	5%	BofA/ML High Yield Master II
EM Debt	5%	5%	JPMorgan EMBI GD
<b>Total Fixed Income</b>	<b>15%</b>	<b>15%</b>	<b>Weighted average fixed income benchmark</b>
<b>Alternatives</b>			
Fund of Hedge Fund	9%	10%	HFRI Fund of Fund Index
Private Equity	10%	10%	Custom Cambridge Private Equity Index
Real assets - Real estate	10%	10%	NCREIF ODCE Index
Real assets - Other	5%	5%	Bloomberg Commodity Index
<b>Total Alternatives</b>	<b>34%</b>	<b>35%</b>	<b>Weighted average alternatives benchmark</b>
<b>Total Portfolio</b>	<b>100%</b>	<b>100%</b>	<b>Weighted average total portfolio benchmark</b>

**G. Required Additional Information**

The Commission's February 27, 2017 ORDER DIRECTING XCEL TO ANALYZE FUND INVESTMENTS AND RETAIN OUTSIDE EXPERT in Docket No. E002/M-14-761 requires that our annual compliance filing include certain additional historical information. As we discussed during the December 21, 2016 hearing in this docket, we think that comparisons to other asset allocations have limited value, particularly when those other allocations—such as the S&P 500 or the Schwab Moderately Aggressive Portfolio—reflect significantly different risk profiles than our current NDT asset allocation. Nevertheless, we do not object to providing this data for informational purposes, as requested by the Commission, and we do so here.

The following chart provides 5, 10, and 20-year historical returns for our qualified NDT portfolio as a whole<sup>1</sup> (including each individual asset class<sup>2</sup>), and our total portfolio benchmark<sup>3</sup> returns for the same periods.

**Table 8**

	<u>5-year</u>		<u>10-year</u>		<u>20-year</u>	
	Return	Benchmark	Return	Benchmark	Return	Benchmark
NDT qualified composite	7.3%	6.0%	4.3%	3.3%	4.6%	4.1%
US equity	14.5%	14.7%	6.8%	7.1%	--	7.9%
EAFE equity	6.7%	6.5%	--	0.7%	--	4.2%
EM equity	2.0%	1.3%	--	2.0%	--	5.6%
IG fixed income	3.2%	1.4%	5.2%	3.8%	5.1%	4.1%
High yield	6.0%	7.4%	--	7.4%	--	7.0%
EM debt	5.7%	5.9%	--	6.7%	--	8.7%
Hedge fund of funds	5.0%	1.9%	--	1.3%	--	4.5%
Commodities	-8.4%	-9.0%	--	-5.6%	--	0.5%
Real Estate	14.0%	11.3%	--	6.9%	--	9.8%
Private equity	17.0%	10.9%	--	--	--	--
Cash	3.7%	0.2%	--	1.2%	--	2.7%

The next chart provides historical returns for the S&P 500 index, the 10-year treasury note, and the Department's recommended portfolio. While 10-year and 20-year returns are provided for the S&P 500 index and the 10-year treasury note, only 5-year returns are available for the Department's recommended portfolio, which is based on Exchange Traded Funds (ETFs) that did not exist 10 years ago and therefore do not have return data for longer periods.

<sup>1</sup> The NDT qualified composite is comprised of the following:

- 5-year period: Official BNY Mellon performance data
- 10-year period: Blend of official BNY Mellon data (1/1/2009 onwards) and annual Qualified Trust return data from the 2014 triennial filing
- 20-year period: Blend of official BNY Mellon data (1/1/2009 onwards) and annual Qualified Trust return data from the 2014 triennial filing

<sup>2</sup> Investment grade fixed income (IGFI) and US Equity are the only NDT asset classes that have existed in the portfolio for 10 years. IGFI is the only NDT asset class that has existed in the portfolio for 20 years.

<sup>3</sup> The composition of the NDT qualified composite benchmark has evolved over time as follows:

- 1/1/1994 - 12/31/1998: 50% 5-year Muni / 50% 10-year Muni
- 1/1/1999 - 9/30/2006: Intermediate Gov/Credit Index (tax-effected at 33% annual turnover)
- 10/1/2006 - 12/31/2008: Weighted blend between Intermediate Gov/Credit Index (tax-effected at 33% annual turnover) and S&P 500
- 1/1/2009 - 12/31/2016: Weighted blend between a diversified set of asset class benchmarks

The chart also provides data for other NDTs, as required by the Commission's Order. However, the return data for other NDTs is based on 2015 asset allocation data reported by Callan Associates, which we have used to calculate a proxy return—*i.e.*, the average return we would expect for the NDTs given the average asset allocation reported by Callan Associates. We are using these proxy returns because Callan does not report on actual NDT returns, and we have not been able to identify any other publicly available source for aggregate return data for other NDTs. We calculated the proxy returns by using the 2015 average asset allocation for NDTs, as reported by Callan, and applying those asset class weights to benchmark indexes or passive investment vehicles for the periods identified below.

**Table 9**

	<b>5-Year Return</b>	<b>10-Year Return</b>	<b>20-Year Return</b>
<b>S&amp;P 500 index</b>	14.7%	6.9%	7.7%
<b>10-year Treasury Note</b>	1.5%	5.4%	6.3%
<b>DOC portfolio</b>	11.8%	--	--
<b>Other NDTs (Proxy Return)</b>	8.2%	5.1%	6.3%

## CERTIFICATE OF SERVICE

I, Jim Erickson, hereby certify that I have this day served copies of the foregoing document or a summary thereof on the attached lists of persons:

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

xx via electronic filing

**DOCKET No.: E002/M-14-761**

Dated this 3rd day of April 2017

/s/

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Jim Erickson  
Regulatory Administrator

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