414 Nicollet Ave
Minneapolis, MN 55401

**PUBLIC DOCUMENT**
**TRADE SECRET DATA EXCISED**

November 16, 2015

**- Via Email and Federal Express -**

Darrell Nitschke, Executive Director
North Dakota Public Service Commission
State Capitol Building, Dept 408
600 East Boulevard
Bismarck, ND 59505-0480

RE: NORTHERN STATES POWER COMPANY
ADVANCED DETERMINATION OF PRUDENCE – MANKATO PPA APPLICATION
CASE NO. PU-15-096

Dear Mr. Nitschke:

Northern States Power Company, doing business as Xcel Energy, respectfully submits Late Filed Exhibits NSP-LF1 and NSP-LF2 in the above referenced matter.

During the hearings held on October 15, 2015, additional information was requested by the Commission. These items were identified for the record and pre-admitted as "late-filed exhibits" and are labeled as Exhibits NSP-LF1 and NSP-LF2. Exhibit NSP-LF1 provides information supporting discussion of MISO's concerns with respect to resource adequacy in 2014. Exhibit NSP-LF2 provides information pertaining to capacity sales that the Company has entered into for the 2015/2016 and 2016/2017 planning years.

Exhibit NSP-LF2 contains trade secret information. In accordance with Section 69-02-09-02 of the North Dakota Administrative Code, an Application for Trade Secret Protection is being provided along with a single copy of the trade secret version of the Application and supporting testimony in a sealed envelope marked **TRADE SECRET-PRIVATE**. We note that the information contained in Exhibit NSP-LF2 is highly sensitive competitive information relating to sales of

capacity including pricing and quantities which could be of value to market participants, including the Calpine Corporation that is a party to this proceeding. The Company has discussed the handling of this information with the other Parties and understands that Calpine has waived any right to review the trade secret information in Exhibit NSP-LF2. The Company looks forward to working with the Parties, if necessary, to determine the most appropriate way to handle this information.

Please contact me if you have any questions regarding this filing at Alison.c.archer@xcelenergy.com or 612-215-4662.

Sincerely,

/s/

ALISON C. ARCHER
Assistant General Counsel
Enclosures

**PUBLIC DOCUMENT – TRADE SECRET DATA EXCISED**

The following provides information for system capacity sales currently entered into for system capacity for the MISO 2015/2016 and 2016/2017 planning years. They are representative of the types of system sales that the Company typically makes in any given year. In the event that there is a substantial resource addition providing significant capacity length for a given period, the Company may increase the amount of sales it makes.

By way of background, capacity sales are usually denominated in either MW/month or as Zonal Resource Credits (ZRC). A ZRC is a credit for owning resources that count towards MISO resource adequacy requirements. By selling ZRCs from capacity, an entity does not give up any transmission, ARR, or energy production rights, other than being required to meet the MISO Must-Offer requirement. ZRCs replace PRCs (Planning Resource Credits), which are part of the existing construct, and will be granted to resource owners in the same way that PRCs are currently granted. Under the current construct, resource credits (PRCs) can be applied anywhere in the footprint. Under the new construct, resource credits (ZRCs) are zone specific. Please note that ZRCs are available in 1/10 MW fractions.

**[TRADE SECRET BEGINS…**

**… TRADE SECRET ENDS]**