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December 7, 2018

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VIA EMAIL AND FEDERAL EXPRESS

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

**Re: Northern States Power Company
Advance Prudence - Acquisition of the 375 MW Mankato Energy Center and
the 345 MW Mankato Energy Center II
Case No. PU-18-___**

Dear Mr. Nitschke:

Northern States Power Company, doing business as Xcel Energy, respectfully submits this Application for an Advance Determination of Prudence for the Company to acquire from Southern Power Company the Mankato Energy Center, LLC, which owns the existing 375 MW Mankato Energy Center (MEC I), and the Mankato Energy Center II, LLC, which owns the 345 MW expansion project (MEC II) scheduled to go in-service in June 2019.

The Company's Application and supporting testimony contain 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 **PROTECTED INFORMATION – PRIVATE**.

An original and ten copies of the public version of our Application are also being provided, along with the following:

- Direct testimonies of Company witnesses Ms. Bria Shea and Mr. Philip Joseph Martin, supporting the Company's Application;
- Verifications for the testimonies of Ms. Shea and Mr. Martin; and
- CD containing the public version of the Application, testimonies and verifications, and Application for Trade Secret Protection.



Darrell Nitschke
December 7, 2018
Page 2

In an effort to file this Application in an expedited manner, the \$175,000 filing fee required by N.D.C.C. § 46-05-16(1)(b) is not included with this Application package. The Company will submit the required filing fee to the Commission as soon as practicable.

Please contact me at (612) 977-8865 or zsimpser@briggs.com or David Sederquist at (701) 241-8632 or dave.sederquist@xcelenergy.com if you have any questions regarding this filing.

Sincerely,

BRIGGS AND MORGAN, P.A.

/s/ Zeviel T. Simpser

Zeviel T. Simpser

ZTS

Enclosures

cc: Via Email - Public Version Only:
Illona A. Jeffcoat-Sacco
Victor Schock
Patrick J. Fahn
Jerry Lein
Jack Schuh