EXHIBIT 14

PUBLIC DOCUMENT
NOT-PUBLIC AND TRADE SECRET DATA EXCISED

Rebuttal Testimony
Farah L. Mandich

STATE OF NORTH DAKOTA
BEFORE THE
NORTH DAKOTA PUBLIC SERVICE COMMISSION

In the Matter of the Application of Northern States Power Company
for an Advance Determination of Prudence for Repowered Wind Portfolio

and

In the Matter of the Application of Northern States Power Company
for an Advance Determination of Prudence for 120 MW Northern Wind Facility

Case Nos. PU-20-425 and PU-21-093
Exhibit___(FLM-2)

Resource Planning Rebuttal

48 PU-21-93 Filed 09/30/2021 Pages: 23
Exhibit 14 - Pre-filed Rebuttal Testimony of Farah L. Mandich (Public)
Northern States Power Company

August 10, 2021

53 PU-20-425 Filed 09/30/2021 Pages: 23
Exhibit 14 - Pre-filed Rebuttal Testimony of Farah L. Mandich (Public)
Northern States Power Company

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I. INTRODUCTION AND QUALIFICATIONS

Q. PLEASE STATE YOUR NAME AND TITLE.

A. My name is Farah L. Mandich. I am a Resource Planning Specialist for Northern States Power Company-Minnesota (NSP or Xcel Energy or the Company).

Q. HAVE YOU PREVIOUSLY PROVIDED TESTIMONY IN THESE PROCEEDINGS?

A. Yes. I filed Direct Testimony supporting the Company's applications for advanced determinations of prudence in both of the consolidated cases. My testimony provided economic analyses of the repowerings and the proposed Northern Wind acquisition.

Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?

A. I provide our response to the Direct Testimony of Charles E. Janecek filed on behalf of the Advocacy Staff of the North Dakota Public Service Commission (Advocacy Staff). In addition to responding to Mr. Janecek's testimony, my testimony also contain information regarding changes to the timing of two of the projects, Borders Wind and Pleasant Valley, and provides updated economic analyses of the proposed projects and the overall benefits we expect them to provide.

II. UPDATED SCHEDULE AND ECONOMIC ANALYSES

Q. WHAT IS THE PURPOSE OF THIS PORTION OF YOUR TESTIMONY?

A. In this section of my testimony, I discuss a change in the timeline for the Borders Wind and Pleasant Valley Wind repowering projects, and present updated economic analyses of the projects.

Q. AS A REMINDER, PLEASE DESCRIBE THE PROJECTS THAT ARE THE SUBJECT OF THESE CASES.

A. Case No. PU-20-425 involves the repowering of four Company-owned wind generation facilities: 1) Border Winds, a 150 MW facility in Rolette County, North Dakota, 2) Grand Meadows Wind, a 100.5 MW facility in Mower County, Minnesota, 3) Nobles Wind, a 201 MW facility in Nobles County, Minnesota, and 4) Pleasant Valley Wind, a 200 MW facility in Mower County, Minnesota. The four individual projects, each of which are described in Company Witness Christopher J. Shaw's Direct Testimony in Case No. PU-20-425, involve changes to existing turbines (and associated components) to increase efficiency and electric production.

Case No. PU-21-093 involves the proposed acquisition of an expanded and repowered 120 MW Northern Wind project. Currently, the project consists of two separate projects located in Murray County, Minnesota, which together total 100 MW and are the subject of two power purchase agreements (PPAs), which are both due to expire in 2023. The current owner, ALLETE Clean Energy, Inc. will repower the existing projects and carry out a 20 MW greenfield expansion, and the Company will then acquire the overall project.

This project is further described in Mr. Shaw's Direct Testimony in Case No. PU-21-093.

Q. WHAT IS THE CHANGE IN THE TIMELINE FOR THE BORDER WINDS AND PLEASANT VALLEY WIND PROJECTS?

A. The timeline for those two re-powering projects have been pushed back so that the scheduled Commercial Operation Date (COD) for those two repowerings is now the fourth quarter of 2025.

Q. WHY DID THE COMPANY CHANGE THE SCHEDULE FOR THOSE TWO PROJECTS?

A. After conducting further analysis, the Company determined that it could maximize customer benefit by taking advantage of additional Production Tax Credits (PTCs) that would be available if the project COD was extended to December 2025. In other words, an additional year of Production Tax Credits (PTCs) could be captured from the existing projects' eligibility; the existing facilities are due to receive PTCs until December 2025.

Q. HAS THE COMPANY UPDATED ITS ECONOMIC ANALYSES OF THE REWPOWERED PROJECTS IN LIGHT OF THE CHANGED IN-SERVICE DATE OF THE BORDER WINDS AND PLEASANT VALLEY PROJECTS?

A. Yes, given the change in the scheduled COD for the Border Winds and Pleasant Valley projects and the passage of time since we submitted our initial applications, we conducted new pro forma and Encompass analyses.

Q. OTHER THAN CHANGING THE TIMELINE FOR TWO OF THE PROJECTS, DO THESE ANALYSES DIFFER FROM THOSE PRESENTED IN THE COMPANY'S APPLICATIONS?

A. For the pro forma analyses, the Company did not make any other changes. Each Pleasant Valley and Border Winds analysis compares a "change case," where the projects are repowered, to a base case in which they are not repowered. The revised analysis assesses the total PVRR benefit of the Company repowering the projects with an in-service date of 2025 rather than 2024, as previously proposed. This analysis is intended to re-evaluate the full benefit of repowering the two projects one year later than originally planned. Because nothing else in the analysis has changed, we can compare the two results to isolate the benefits of extending the in-service date.

We approached the EnCompass analysis differently. As discussed in the record, we have now consolidated the dockets for the initial wind repowering portfolio and the Northern Wind project, and two of the originally proposed PPAs are no longer moving forward at this time. To provide the Commission an updated view of the benefits of the projects being considered here, we have conducted supplemental EnCompass modeling that examines a base case in which no projects are repowered, to a Change Case in which only projects that continue to move forward – including Grand Meadow, Nobles, Pleasant Valley, Border Winds, Ewington, and Northern Wind – are repowered, incorporating the later in-service dates for the Pleasant Valley and Border Winds projects. This analysis shows an updated and consolidated view of the total repowering portfolio, incorporating potential impacts of changes to the expansion plan or system dispatch resulting from the repowering portfolio.

As noted previously, although it is included in our analysis, the Ewington project is under 50 MW and thus we have not sought an ADP for that project.

A. Pro Forma Analysis

Q. WHAT CUSTOMER BENEFITS DID THE UPDATED PRO FORMA ANALYSIS USING GENERIC WIND AS A REPLACEMENT RESOURCE INDICATE FOR THE PROJECTS THAT ARE THE SUBJECT OF THIS CONSOLIDATED MATTER APPLICATION?

A. On an aggregate basis, this pro forma analysis showed $224.6 million in savings for the Company-owned projects and **[TRADE SECRET DATA BEGINS [redacted] TRADE SECRET DATA ENDS]** million for the Northern Wind facility, over the full lives of each project. The pro forma analysis indicated that repowering of Border Winds would result in **[TRADE SECRET DATA BEGINS [redacted] TRADE SECRET DATA ENDS]** million in savings, the repowering of Pleasant Valley Wind would result in **[TRADE SECRET DATA BEGINS [redacted] TRADE SECRET DATA ENDS]** million in savings. The other projects were not changed. These savings are on a present value of revenue requirements (PVRR) basis and – per North Dakota law – do not include carbon dioxide costs, other environmental externality values, or costs for potential future carbon emissions regulations.

Q. WHAT CUSTOMER BENEFITS DID THE PRO FORMA ANALYSIS USING MARKET ENERGY (RATHER THAN GENERIC WIND) AS A REPLACEMENT RESOURCE

INDICATE FOR THE FOUR SELF-BUILD PROJECTS THAT ARE THE SUBJECT OF THIS APPLICATION?

A. On an aggregate basis, this pro forma analysis showed $150.3 million in savings for the Company-owned projects and **[TRADE SECRET DATA BEGINS [redacted] TRADE SECRET DATA ENDS]** million for Northern Wind. The pro forma analysis indicated that repowering of Border Winds would result in **[TRADE SECRET DATA BEGINS [redacted] TRADE SECRET DATA ENDS]** million in savings, the repowering of Pleasant Valley Wind would result in **[TRADE SECRET DATA BEGINS [redacted] TRADE SECRET DATA ENDS]** million in savings. The other projects were not changed. Again, these savings are on a present value of revenue requirements (PVRR) basis and do not include carbon dioxide costs, other environmental externality values, or costs for potential future carbon emissions regulations. Table 1 below summarizes the results of our pro forma analysis.

Table 1: Pro Forma Savings Resulting from Repowering Projects

Project Name	Type	Revised Repower Savings (M) (generic wind replacement)	Revised Repower Savings (M) (market price replacement)	Original Repower Savings $M (generic wind replacement)	Original Repower Savings $M (market price replacement)
Border Winds	Self-build	[TRADE SECRET DATA BEGINS [redacted]	[TRADE SECRET DATA BEGINS [redacted]	[TRADE SECRET DATA BEGINS [redacted]	[TRADE SECRET DATA BEGINS [redacted]
Pleasant Valley	Self-build	[redacted] TRADE SECRET DATA ENDS]	[redacted] TRADE SECRET DATA ENDS]	[redacted]	[redacted]
Grand Meadow	Self-build	No change	No change	[redacted]	[redacted]
Nobles	Self-build	No change	No change	[redacted] TRADE SECRET DATA ENDS]	[redacted] TRADE SECRET DATA ENDS]
Total self-build		$224.6	$150.3	$138.0	$87.9
Northern Wind	Build-own-transfer (BOT)	No change	No change	[TRADE SECRET DATA BEGINS [redacted] TRADE SECRET DATA ENDS]	[TRADE SECRET DATA BEGINS [redacted] TRADE SECRET DATA ENDS]

Q. WHAT DOES THE TABLE SHOW?

A. The results of the pro forma analyses shown in the table above demonstrate that each of the wind repowering projects that are the subject of this consolidated case are expected to provide cost saving benefits to the

Company's customers regardless of whether the existing resources are assumed to be replaced at the end of their current lives with either generic wind resources or market energy. The cost savings for customers served on the entire NSP System are reflected on a PVRR basis over the projects' lives. For comparative purposes, the table provides the results of the analyses originally presented in my Direct Testimonies in both cases and the updated figures. For the projects other than Border Winds and Pleasant Valley, the results of the analyses are unchanged.

Importantly, these updated analyses show that the change in the timeline for the Border Winds and Pleasant Valley projects significantly increased savings associated with the repowering proposal. In fact, the timing change for those two projects has more than doubled the expected savings on a PVRR basis.

B. EnCompass Analysis

Q. WHAT MODELLING INPUTS AND ASSUMPTIONS WERE USED IN THE SUPPLEMENTAL ENCOMPASS MODELLING AND HOW DO THOSE COMPARE WITH THE ASSUMPTIONS USED IN THE MODELLING DESCRIBED IN YOUR DIRECT TESTIMONY?

A. We originally evaluated the economic impacts of the five projects that are the subject of this consolidated case using base cases that were generally consistent with the Company's Integrated Resource Plan Supplement, filed with the Commission on June 30, 2020[1] with certain updates as discussed in my Direct Testimony. For the Northern Wind project, we used a base case

[1] *See* Case No. PU-19-220. XCEL ENERGY 2020-2034 UPPER MIDWEST INTEGRATED RESOURCE PLAN SUPPLEMENT (June 30, 2020).

that incorporated the previously proposed Company-owned repowering projects, along with an additional PPA that is not subject to ADP requirements, and showed the incremental impact of pursuing the Northern Wind repowering.

For the analysis provided here, the Company has used the same base case as in the original modeling – where none of the projects are repowered – to compare to a Change Case in which only the proposed projects that continue to move forward are repowered, and assumes a COD in 2025 for Border Winds and Pleasant Valley. The Company's full Upper Midwest system resource portfolio is then re-optimized in order to evaluate whether moving forward with the remaining repowered projects – with the updated COD dates for Border Winds and Pleasant Valley – will provide benefits or result in additional costs on a system-wide basis.

Q. WHAT WAS THE RESULT OF THE ENCOMPASS ANALYSIS?

A. The results of the EnCompass analysis shows that, on balance, the proposed portfolio of repowered projects will result in net savings for our customers, including under sensitivity analyses for high and low gas, coal, and market prices. The results of the EnCompass analysis are set forth in Table 2 below.

Table 2: PVRR Savings Resulting from the Updated Wind Repower Portfolio EnCompass Analysis

Present Value Measure	**Cost/(Savings) ($2020 millions)**
PVRR (No CO2 Costs)	(188.9)
Sensitivities	
Low Gas, Coal, and Market Prices	(104.9)
High Gas, Coal, and Market Prices	(305.6)

These figures do not include carbon dioxide costs, other externality values, or potential future regulatory costs for carbon emissions.

Q. WHEN WILL THE COST SAVINGS REPRESENTED IN TABLE 2 ABOVE OCCUR?

A. To understand how these potential costs or savings accrue over time, we examined total system costs on an annual and cumulative basis. Figures 1 and 2 below portrays the annual (undiscounted) and cumulative system costs impacts of incorporating the Wind Repower Portfolio into our system. In contrast to our previous analysis, which had a short increase in relative costs in the mid-2020s, extending the Border Winds and Pleasant Valley COD to 2025 and capturing the last remaining year of tax credits from the existing projects ensures that savings continue to accrue in the near term. In fact, contrary to a point made by Mr. Janecek, our analysis shows significant annual savings by 2025 and cumulative savings from that year forward throughout

the analysis period. The figures below represent the primary PVRR case, with base assumptions for fuel prices.

Figure 1: Annual Costs/(Savings) Resulting from the Updated Wind Repower Portfolio Case, as Compared to the Base Case

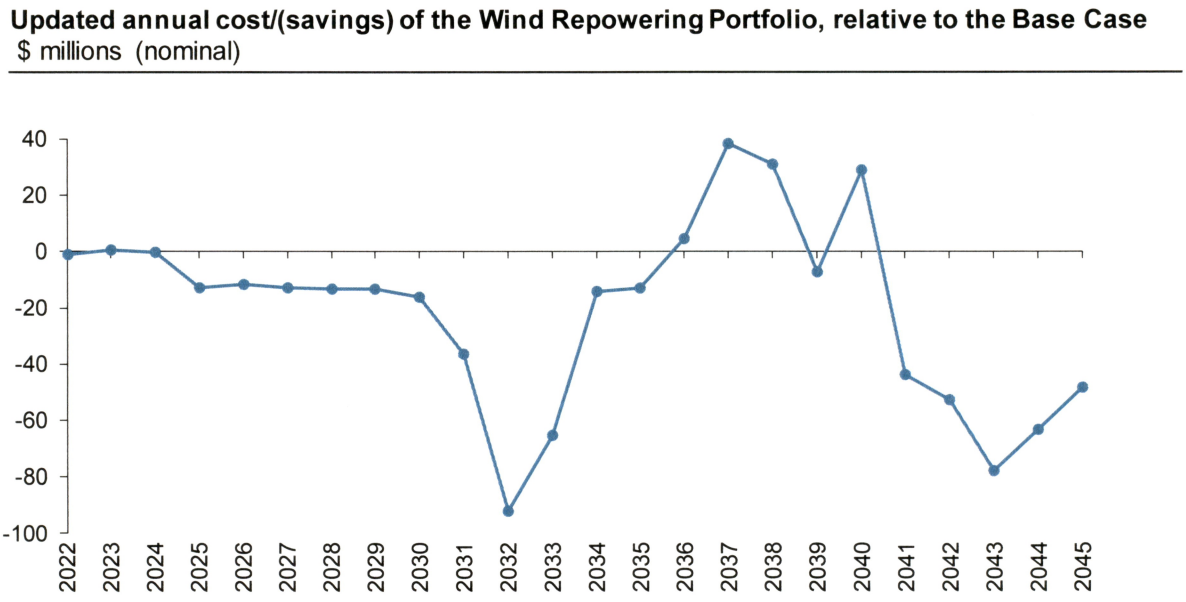
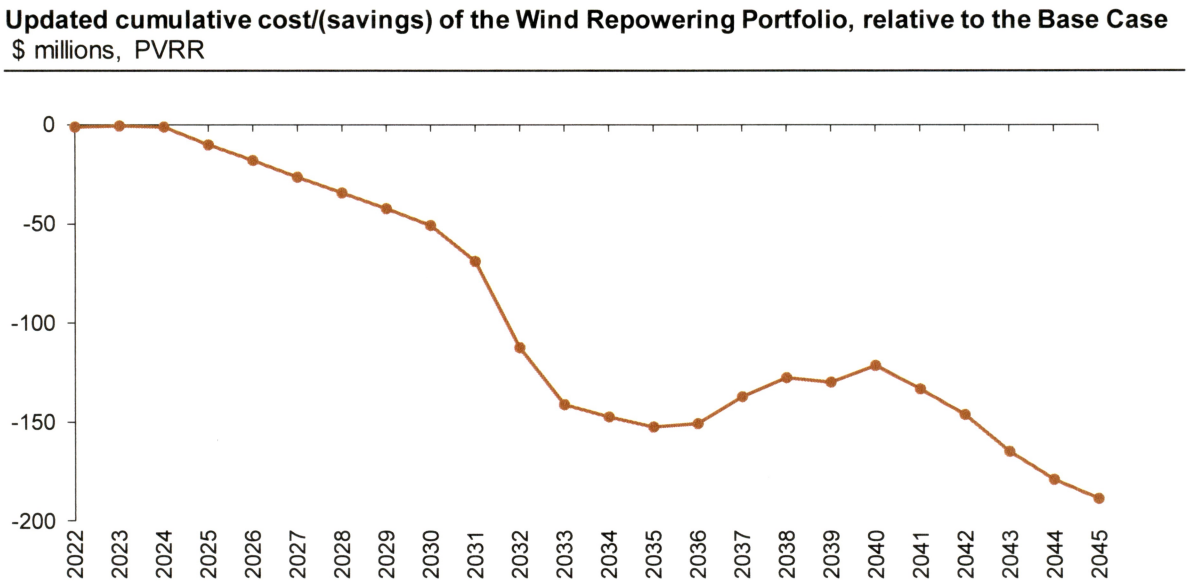


Figure 2: Annual Cumulative Net Present Value Costs/(Savings) Resulting from the Wind Repower Portfolio Case, as Compared to the Base Case



Q. WHAT DO YOU CONCLUDE FROM THIS ANALYSIS?

A. I conclude that the Wind Repower Portfolio will provide material cost savings to the NSP System, including under the high and low-cost sensitivity scenarios. Significant cost savings are now expected to begin as soon as 2025 on an annual basis. In our previous analyses for both the initial portfolio and the Northern Wind repowering, the portfolio resulted in some near-term costs in the mid-2020s before accruing savings throughout the remaining analysis period. As with the pro forma analyses, the Encompass modelling shows that the delay in the Border Winds and Pleasant Valley projects has substantially increased the projected customer savings and eliminated cost increases in the

mid-2020s, relative to the base case. Thus, the extended COD for those two projects results in additional benefits and is beneficial for customers.

Q. IS THE COMPANY CONSIDERING ADDITIONAL CHANGES TO IMPROVE THE ECONOMICS OF THESE PROJECTS?

A. Although we do not have any specific proposals at this time, the Company is always looking to improve the economics of projects for our customers. Should there be a material update, we will inform the Commission.

III. RESPONSE TO MR. JANECEK

Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?

A. In this portion of my testimony, I respond to specific arguments and points made by Mr. Janecek in his Direct Testimony.

Q. CAN YOU SUMMARIZE MR. JANECEK'S RECOMMENDATIONS?

A. In his Direct Testimony, Mr. Janecek recommended that the Commission approve ADPs for the Grand Meadows and Nobles repowering projects, but not for Border Winds, Pleasant Valley, and Northern Wind projects. In addition to disagreeing with his conclusions regarding Border Winds, Pleasant Valley, and Northern Wind, I also disagree with certain of the points and arguments he made in reaching those conclusions, which I will describe further below. As an initial matter, I disagree with Mr. Janecek's discussion of the Company's purpose in seeking to repower these wind projects.

Q. HOW DO YOU DISAGREE WITH MR. JANECEK'S DISCUSSION OF THE PURPOSE OF THESE REPOWERING PROJECTS?

A. In his Direct Testimony, Mr. Janecek discusses the projects in terms of the Company making a "bet" on the MISO markets. Essentially, he is analyzing the Company as if it were the equivalent of an independent power producer. While I understand that is one analytical framework that can be appropriate in considering these projects, I disagree with him in two key respects. As an initial matter, Mr. Janecek is incorrect insofar as he is making a claim about the Company's actual motivations. As Mr. Christopher Shaw previously explained in his Direct Testimony, the Company began considering the possibility of repowering projects in response to a request from the Minnesota Public Utilities Commission to consider projects that might help stimulate the economy in light of the COVID-19 pandemic and its economic impacts. The Company moved forward with those that would have positive economic impacts for customers and would create construction jobs in North Dakota and Minnesota. To the extent Mr. Janecek is making an argument about the Company's motivation and purpose, he is mistaken.

Perhaps more importantly, while Mr. Janecek offers an interesting perspective, I do not believe that it ultimately makes sense to decide the prudence of these projects by treating Xcel Energy as a merchant generator. In actuality, the Company is a vertically integrated utility and the prudence of the projects should be determined in light of their revenue requirement impact. While the projects were not brought forward to meet a capacity or energy need, once the Company determined that repowering these projects could achieve substantial benefits, relative to a case in which we do not repower, over their life while satisfying a system state policy interest in economic development

during the COVID-19 pandemic, it made sense to move forward with the projects.

Q. MR. JANECEK SUGGESTS THAT THE PROJECTED BENEFITS FROM THREE OF THE PROJECTS RELY TOO HEAVILY ON SAVINGS OCCURRING AFTER 2040, WHAT IS YOUR RESPONSE TO THIS ARGUMENT?

A. Simply put, that conclusion does not fit with the results of our modelling. In the modeling presented in my Direct Testimony, our analysis shows that the initial portfolio of projects generally achieves sustained cost savings by 2028, and is expected to accumulative substantial savings over the full analysis period (relative to a case in which they are not repowered). While it is the case that some projects were included in that analysis that ultimately did not move forward – and the Northern Wind project was not included in our initial analysis – we reanalyzed the portfolio in the updated analysis provided above. This current portfolio, along with extending the COD of Border Winds and Pleasant Valley, achieves more savings in an earlier timeframe than even the initial analyses showed. The pro forma results also support this conclusion, meaning that – in comparison with continuing the existing projects and replacing them with generic wind or market energy after their end of lives – each repowering project is expected to result in PVRR benefits for customers, including in the near term. In other words, the extended COD for Pleasant Valley and Border Winds increases the portfolio level savings, relative to our initial analyses, and these savings also begin accruing earlier in the lives of those two projects.

When viewed on a present value of revenue requirements basis, which is appropriate for a vertically integrated utility making a long term investment, Mr. Janecek's arguments are not supported.

Q. WHAT ARE YOUR RESPONSES TO MR. JANECEK'S CRITIQUES OF THE ENCOMPASS MODELLING?

A. I disagree with him on various specific points that I will further discuss below, but from a broader view it is important to understand that various modelling approaches have their advantages and disadvantages. In Direct Testimony and above in Section II, I presented both pro forma analyses and Encompass modelling results. These can be understood as two views of the same question, with a pro forma analysis focused just on the specific and concrete savings from each project in isolation (i.e. repowering the project as compared to not repowering it), and the Encompass modelling considering the impacts of the projects on a broader portfolio point of view, incorporating potential impacts on the rest of the Company's system. Both these analyses necessarily require various key input assumptions – such as natural gas and electricity market prices – which Mr. Janecek noted he believed were within the range of reasonableness. They also both require some simplifying assumptions – such as those characterizing the Company's place within the broader MISO market or what type of replacement energy the "no repowering" baseline should consider.

Mr. Janecek's modelling – relying on examining merchant margins – is another method of analysis that requires simplifying assumptions and does not fully consider the realities of the Company's system. For example, one argument

he notes in reference to EnCompass outputs' validity is that he does not believe the addition of our wind resources would result in changes to how the Company's other plants dispatch in the market. Whether this is true is debatable; however, Mr. Janecek's merchant analysis does not adequately consider the impacts of how the incremental generation from these projects may affect net purchases the Company makes in the MISO market, which is something the EnCompass model does consider.

Although, as I explain above, this merchant view is not aligned to our regulatory model, even his analysis shows the portfolio results in overall savings relative to a case where the projects are not repowered. As noted above, certain of Mr. Janacek's points can be placed in context as a response to the need to include various assumptions and simplifications regarding how our resources participate in the MISO market when modelling with a portfolio-wide approach; however, the Company is not relying solely on Encompass, nor is it running Encompass using only one set of assumptions. We also run Encompass using low and high-cost sensitivities for coal, gas, and market prices. Used in that way, Encompass is an appropriate tool to use in considering the prudence of the projects.

Q. IS MR. JANECEK CORRECT IN STATING THAT THE COMPANY'S ENCOMPASS MODELLING TREATS THE NSP SYSTEM AS A CLOSED SYSTEM?

A. No, that is not correct. As Mr. Janecek himself later notes, there is an option for the model to select market purchases for energy rather than building new resources and the model also includes the capability for the Company to sell into the broader market. Like any model, including Mr. Janecek's analysis, our

Encompass model uses various assumptions to simulate the impacts of the proposed repowered projects on our system. It does not, therefore, fully represent the complexity of the interactions between Xcel Energy's portfolio and the broader MISO market, but it is not accurate to state that it treats our Company as a closed system or an island.

Q. WHAT IS YOUR RESPONSE TO MR. JANECEK'S CONTENTIONS REGARDING THE MANNER IN WHICH THE COMPANY MODELS THE REPOWERING PROJECTS USING ENCOMPASS?

A. It is true that the Encompass model does not select repowered projects in an optimization, but that is because there is no "generic repowering" option for the model to choose. Such projects are site-specific and attempting to model them as generic resource options would not be appropriate. To overcome this, the Company models a base case without the proposed projects and a change case that does include them, and examines the differences between the cases to indicate whether the projects may result in system benefits. In combination with the low and high-price sensitivities in EnCompass, and the pro forma analyses that examine each individual project, our analysis methods are appropriate to understand the potential costs and benefits of the proposed projects.

Q. DO YOU HAVE ANY OTHER RESPONSES TO MR. JANECEK'S CONCERNS REGARDING THE ENCOMPASS MODELLING?

A. The other point I would make is that the Company's pro forma analyses also show substantial (and increased) savings for customers resulting from the repowering projects. The pro forma analyses show benefits based on a

comparison of each repowered project with a baseline in which the existing, un-repowered project remains in the Company's portfolio until the end of its expected life and is then replaced by a generic resource. The cost of the replacement resource is a significant assumption in pro forma modelling; however, not only did the Company perform our analyses using both generic wind and market replacement costs, but Mr. Janecek confirmed that he believes our market price forecasts are reasonable.

Q. HAS MR. JANECEK GIVEN SUFFICIENT WEIGHT TO THE BENEFITS BORDER WINDS WILL PROVIDE TO NORTH DAKOTA?

A. To his credit, Mr. Janecek does discuss those benefits, but I do not believe he gives sufficient consideration to the fact that Border Winds is a project located in North Dakota that will benefit the state. I am not a lawyer, but my understanding is that Section 49-05-16(7) of the North Dakota Century Code states that "There is a rebuttable presumption that a resource addition located in the state is prudent." Moreover, Section 49-05-16(1)(d) provides that for facilities located in North Dakota, the Commission "shall consider the benefits of having the resource addition located in this state." Given that even his own analysis suggests that repowering the Border Winds project will result in customer savings (albeit over the long run) the Company's analyses show substantial savings beginning sooner, and the economic benefits to North Dakota from the repowering of Border Winds, I do not believe Mr. Janecek has successfully met the burden of proving that the project is not prudent.

IV. CONCLUSION

Q. PLEASE SUMMARIZE YOUR TESTIMONY.

A. Both our Encompass modelling and our pro forma analyses show that the repowered wind projects will result in significant savings for North Dakota customers. In light of that, the Commission should approve all the repowering projects, and not just the two recommended by Mr. Janecek. Our analyses do not support Mr. Janecek's claims regarding the timing of the projected savings. Moreover, while it is appropriate to discuss the limitations and assumptions associated with portfolio modelling and use other modelling as a check, the Company's use of Encompass is appropriate, and the benefits of the projects are also supported by the pro forma analyses. The Company has, and is pursuing an opportunity to capture significantly increased benefits for Pleasant Valley and Border Winds by extending the repowering date by one year. Also, the Border Winds project should be approved because it is located in North Dakota and will provide economic benefits to the state, and Mr. Janecek has not rebutted the presumption that it is prudent.

Q. DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?

A. Yes, it does.

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NORTH DAKOTA

NORTHERN STATES POWER COMPANY
ADVANCE PRUDENCE – FOUR REPOWERED WIND PROJECTS APPLICATION

CASE NO. PU-20-425

NORTHERN STATES POWER COMPANY
ADVANCE PRUDENCE – 120 MW NORTHERN WIND FACILITY APPLICATION

CASE NO. PU-21-93

VERIFICATION

STATE OF MINNESOTA)
) SS.
COUNTY OF HENNEPIN)

Farah L. Mandich, being first duly sworn on oath, deposes and says that she is a Resource Planning Specialist for Applicant Northern States Power Company, a Minnesota corporation, in the above-captioned matters, that the Rebuttal Testimony submitted in the above-captioned matters under her name was prepared under her direction, that she knows the contents thereof, and that the same is true and correct to the best of her knowledge and belief.

Farah L. Mandich

Subscribed and sworn to before me on this 5 day of August, 2021

Notary Public
My Commission expires: 1/31/25

STEVEN DELMONT SPIESS
NOTARY PUBLIC
MINNESOTA
My Commission Expires Jan. 31, 2025

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