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March 14, 2024

—VIA EMAIL & U.S. MAIL—

Mr. Steven M. Kahl, Executive Director  
North Dakota Public Service Commission  
State Capitol Building, Dept. 408  
600 East Boulevard  
Bismarck, ND 58505-0480

RE: REQUEST TO WITHDRAW  
APPLICATION FOR ADVANCE DETERMINATION OF PRUDENCE –  
MONTICELLO NUCLEAR PLANT EXTENSION (CASE NO. PU-23-064)

Dear Mr. Kahl:

Northern States Power Company, doing business as Xcel Energy, by way of this letter formally requests to withdraw its Application for an Advance Determination of Prudence (ADP) for an extension of the life of the Monticello Nuclear Generating Plant (Monticello Plant or Plant) beyond its current 2030 retirement date.

In its Order dated February 21, 2024 in Case No. PU-23-366, the Commission adopted the First Amended and Restated Settlement Agreement which removed the requirement that the Company must file ADP applications for proposed new construction, rehabilitation, or acquisition of certain resources. The original intent of the ADP obligation was to increase transparency and engage with the Commission regarding significant resource additions in advance of general rate proceedings.

In prior years, the Commission did not have a vehicle outside the ADP process in which to formally consider the Company's resource acquisitions. Now these resources will be considered in our integrated resource plans (IRPs). The Company will be filing an IRP for North Dakota in late March that complies with the new resource planning requirements. A key element of the plan includes extending the lives of both the Monticello Plant and the Prairie Island Nuclear Generating Plant into the 2050's.

Within the North Dakota IRP the Company will analyze in detail how the extension of the Monticello Plant impacts system reliability and rates for our customers. But more importantly, it will review the extension holistically with other proposed resource mixes on both five- and fifteen-year planning horizons to meet current and future electric capacity and energy needs.

Given the robust analysis that will occur in our upcoming IRP, carrying out the full ADP process for this matter is duplicative and very time consuming for both the Commission and the Company. It is of note that a three-day hearing has been set for this matter at the end of May 2024. There is also a tight timeline within which multiple rounds of testimony must be filed prior to the start of the hearing. Therefore, we kindly request to withdraw our ADP application on an urgent basis to conserve the time and resources of the Commission and the Company.

The Company has discussed this request with Commission Staff. Staff is in agreement that this is a reasonable request given the circumstances of this matter. Please be advised that the Company is not waiving any rights or arguments with respect to the prudence of the Project.

We thank the Commission and Staff for your time and consideration of this matter. Please contact me at [alex.j.nisbet@xcelenergy.com](mailto:alex.j.nisbet@xcelenergy.com) if you have any questions regarding this correspondence.

Sincerely,

/s/

ALEX NISBET  
REGULATORY POLICY SPECIALIST

cc: Adam Renfandt  
Victor Schock