

BEFORE THE NEW MEXICO PUBLIC REGULATION COMMISSION

**IN THE MATTER OF SOUTHWESTERN)
PUBLIC SERVICE COMPANY'S)
APPLICATION FOR: (1) REVISION OF)
ITS RETAIL RATES UNDER ADVICE)
NOTICE NO. 282; (2) AUTHORIZATION) CASE NO. 19-00170-UT
AND APPROVAL TO SHORTEN THE)
SERVICE LIFE OF AND ABANDON ITS)
TOLK GENERATING STATION UNITS;)
AND (3) OTHER RELATED RELIEF,)
)
SOUTHWESTERN PUBLIC SERVICE)
COMPANY,)
)
APPLICANT.)
_____)**

DIRECT TESTIMONY

of

MELISSA L. SCHMIDT

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

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GLOSSARY OF ACRONYMS AND DEFINED TERMS

<u>Acronym/Defined Term</u>	<u>Meaning</u>
A&G	administrative and general
Base Period	April 1, 2018 through March 31, 2019
Commission	New Mexico Public Regulation Commission
FERC	Federal Energy Regulatory Commission
LTD	long-term disability
NSPM	Northern States Power Company, a Minnesota corporation
NSPW	Northern States Power Company, a Wisconsin corporation
Operating Companies	PSCo, NSPM, NSPW, and SPS
O&M	operation and maintenance
PUHCA 1935	Public Utility Holding Company Act of 1935
PUHCA 2005	Public Utility Holding Company Act of 2005
PSCo	Public Service Company of Colorado, a Colorado corporation
RFP	Rate Filing Package
RTU	remote terminal unit
SCADA	Supervisory Control and Data Acquisition
SEC	Securities and Exchange Commission

<u>Acronym/Defined Term</u>	<u>Meaning</u>
SPS	Southwestern Public Service Company, a New Mexico corporation
Test Year	Historical Test Year Period consisting of the Base Period and further incorporating all proper adjustments and capital additions
WBS	Work Breakdown Structures
WestGas	WestGas Interstate, Inc.
Xcel Energy	Xcel Energy Inc.
XES	Xcel Energy Services Inc.

LIST OF ATTACHMENTS

<u>Attachment</u>	<u>Description</u>
MLS-1	XES Billings for 12 months ending March 31, 2019 (<i>Filename: MLS-1.xlsx</i>)
MLS-2	SPS NMPRC Rule 450 Annual Report of Class I Transactions for the Period ended December 31, 2018 (<i>Non-native format</i>)
MLS-3	SPS Class II Transactions for the Period ended December 31, 2018 (<i>Filename: MLS-3.xls</i>)
MLS-4	XES 2018 FERC Form 60 (<i>Non-native format</i>)
MLS-5	XES Service Agreement with SPS (<i>Non-native format</i>)
MLS-6	XES Allocating Cost Center Descriptions (<i>Filename: MLS-6.xlsx</i>)
MLS-7	Allocating SCADA EMS (<i>Filename: MLS-7.xlsx</i>)
MLS-8(V)	XES Allocating Cost Center Calculations (<i>Filename: MLS-8.xlsx</i>)
MLS-9	XES Policies and Procedures (<i>Non-native format</i>)
MLS-10	Shared Assets Agreement (<i>Non-native format</i>)
MLS-11	First Amendment to the Shared Assets Agreement (<i>Non-native format</i>)

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of
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1 **I. WITNESS IDENTIFICATION AND QUALIFICATIONS**

2 **Q. Please state your name and business address.**

3 A. My name is Melissa L. Schmidt. My business address is 401 Nicollet Mall,
4 Minneapolis, Minnesota 55401.

5 **Q. On whose behalf are you testifying in this proceeding?**

6 A. I am filing testimony on behalf of Southwestern Public Service Company, a New
7 Mexico corporation (“SPS”) and wholly-owned electric utility subsidiary of Xcel
8 Energy Inc. (“Xcel Energy”).

9 **Q. By whom are you employed and in what position?**

10 A. I am employed by Xcel Energy Services Inc. (“XES”), the service company
11 subsidiary of Xcel Energy, as Director of Corporate Accounting, which includes
12 Corporate Accounting, Service Company Accounting, Cash Processes, and
13 Business Area Accounting.

14 **Q. Please briefly outline your responsibilities as Director of Corporate**
15 **Accounting, Service Company Accounting, Cash Processes, and Business**
16 **Area Accounting.**

17 A. As Director of Corporate Accounting, which includes Corporate Accounting,
18 Service Company Accounting, Cash Processes, and Business Area Accounting, I
19 am responsible for the general administration of XES, including accounting,

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1 billing, allocations, policies and procedures, service agreements, internal audits,
2 external audits, and external reporting to state and federal regulatory agencies.
3 Additionally, I direct Xcel Energy's Corporate Accounting group, which manages
4 the month-end close process, legal consolidation process, maintain the general
5 ledger, and other accounting functions and controls; the Cash Processes group,
6 which is responsible for monitoring and reconciling the cash activity, long-term
7 debt, and other related items for all Xcel Energy affiliates and subsidiaries; and
8 the Business Area Accounting group, which is responsible for the accounting
9 functions for the business areas of Xcel Energy which includes Energy Supply,
10 Transmission, Distribution, Gas Engineering & Operations, and Corporate
11 Services.

12 **Q. Please describe your educational background.**

13 A. I received a Bachelor of Arts in Business Administration, with a major in
14 accounting, from University of St. Thomas, St. Paul, Minnesota, in 2000.

15 **Q. Please describe your professional experience.**

16 A. I have been employed by XES since April 2005, holding positions in Corporate
17 Accounting, Internal Reporting, Benefits Accounting, Sarbanes-Oxley
18 management, and External Reporting. Prior to joining XES, I was employed by

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1 Temple Inland as a senior financial and operational auditor. Prior to Temple
2 Inland, I was employed by Andersen LLP and Deloitte LLP, where I performed
3 financial statement audits for companies in various industries, including energy
4 and utilities, manufacturing, retail, and travel services.

5 **Q. Have you filed testimony before any regulatory authorities?**

6 A. Yes. I have filed testimony before the New Mexico Public Regulation
7 Commission (“Commission”) in Case No. 17-00255-UT¹ concerning the same
8 topics discussed in this testimony.

¹ *In the Matter of Southwestern Public Service Company’s Application for Revision of Its Retail Rates Under Advice Notice No. 272, Case No. 17-00255-UT, New Final Order on Partial Mandate from the New Mexico Supreme Court (Mar. 6, 2019).*

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1 treatment entries and practices for the XES affiliate charges. I also establish that
2 the affiliate charges to SPS are “at cost.” In addition, I explain the allocation
3 methods used to assign XES allocated costs to SPS. Apart from my testimony,
4 SPS is presenting a group of witnesses who support the overall O&M expenses
5 SPS incurred during the Base Period and adjusted to represent the Test Year
6 expenses,³ which include affiliate costs.⁴ These witnesses testify about the
7 reasonableness and necessity of those expenses, which includes both affiliate
8 costs and native costs (SPS’s non-affiliate costs).

9 **Q. Please summarize the recommendations and conclusions in your testimony.**

10 A. The system and methodologies used for XES and its Operating Companies and
11 affiliated interests to provide services and charge for those services is appropriate
12 under the law and accurately distributes the costs based upon the benefits received
13 by the affiliated interest. The charges from XES to SPS for services is set out in
14 the Service Agreement, which was updated in September 2016 to reflect the
15 current processes used. The charges to SPS for services performed by XES or
16 another Operating Company are charged “at cost.” Additionally, the process for

³ The Test Year is the Historical Test Year Period consisting of the Base Period (April 1, 2018 through March 31, 2019) and further incorporating all proper adjustments and capital additions.

⁴ Please refer to the Direct Testimony of William A. Grant for identification of the witnesses who address O&M.

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1 charging out labor and labor-related overheads is reasonable and represents actual
2 costs for each affiliated interest.

3 **Q. Were Attachments MLS-1 through MLS-11 prepared by you or under your**
4 **direct supervision and control?**

5 A. Yes. With the exception of Attachment MLS-3, which was taken from SPS's
6 New Mexico 2018 Annual Report filed with the Commission. I have confirmed
7 the accuracy of the information provided in Attachment MLS-3.

8 **Q. Was RFP Schedule H-14 that you co-sponsor prepared by you or under your**
9 **direct supervision and control?**

10 A. Yes.

11 **Q. Do you incorporate the RFP schedule you sponsor into your testimony?**

12 A. Yes.

13 **Q. How were New Mexico retail jurisdictional amounts in your testimony and**
14 **attachments calculated?**

15 A. Throughout this testimony, I quantify the expense and asset amounts on a New
16 Mexico retail basis based upon the jurisdictional allocation percentages SPS
17 witness Arthur P. Freitas uses to develop the New Mexico retail revenue
18 requirement in his Attachment APF-6. Mr. Freitas is responsible for calculating

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1 jurisdictional allocation percentages that apply to the various costs components in
2 the cost of service. My staff and I conferred with Mr. Freitas and his staff to
3 determine these New Mexico retail jurisdictional amounts presented in my
4 testimony. If the percentages used to allocate amounts to the New Mexico retail
5 jurisdiction change, those new allocation percentages will need to be applied to
6 the total company numbers to derive updated New Mexico retail amounts.

1 **III. DEFINITIONS**

2 **Q. In the remainder of your testimony, will you be using certain terms?**

3 A. Yes. For ease of reading and reference, I have defined the following terms that
4 will be used throughout my testimony:

- 5 • **Allocated Charges:** Allocated, or indirect, charges occur when services
6 cannot be directly assigned to a specific legal entity.
- 7 • **Allocating Cost Center:** An Allocating Cost Center is used to collect
8 costs that will be allocated to other cost centers, Internal Orders, or Work
9 Breakdown Structures (“WBS”).
- 10 • **Allocation Methods or Formulas:** Allocation methods or formulas are
11 the basis for assigning costs to an affiliate and result from using a single
12 allocation ratio or the average of two or more allocation ratios. Examples
13 of allocation methods or formulas are: Number of Customers; Number of
14 Employees; and Assets, Revenue, and Number of Employees - known as a
15 “three-factor formula” which is based on the average of those ratios.
- 16 • **Allocation Ratios or Factors:** Each set of allocation statistics is used to
17 calculate an allocation ratio or factor. For example, the employee ratio
18 uses the number of employees for each affiliate to the total number of
19 employees for all affiliates to determine the percent of services chargeable
20 to each affiliate.
- 21 • **Allocation Statistics:** Allocation statistics are the actual numerical inputs
22 used to derive the allocation ratios or factors. Examples of statistics are:
23 the number of employees, dollar amount of assets, dollar amount of
24 revenues, number of customers, number of invoice transactions, megawatt
25 hours of generation, and number of customer bills.
- 26 • **Assessment:** The process used by the accounting system to allocate costs
27 from an allocating cost center to the receiving cost element.

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- 1 • **Cost Center:** An organizational unit that represents a defined functional
2 location where costs are incurred.
- 3 • **Direct Charge:** Direct charges occur when an employee of any affiliate
4 including XES can clearly identify that the service being rendered is for
5 the benefit of a specific legal entity. Under XES’s accounting practices, if
6 a charge is the result of an allocation performed before the charge is
7 entered into the accounting system, then the accounting system treats the
8 charge as a direct charge. The application of an allocation performed
9 before the charge is entered into the accounting system is an “off-line
10 allocation.”
- 11 • **Final Cost Center:** A cost center defined by business area, Operating
12 Company or affiliate, and Profit Center.
- 13 • **Internal Order:** Internal Orders are required for all transactions that are
14 booked to an income statement account. Each internal order is associated
15 with only one Operating Company or affiliate. All Internal Orders have
16 settlement rules assigned at the time they are created. The settlement rules
17 determine how the costs will be treated during the month-end close
18 process in SAP. For example:
- 19 ○ If the settlement rule states that the costs in a specific internal order are
20 to settle to an internal order on an Operating Company or affiliate, the
21 costs are direct charged to that Operating Company or affiliate.
- 22 ○ If the settlement rule states that the costs in a specific internal order are
23 indirect or allocated Service Company charges, the Service Company
24 internal order will settle to an Allocating Cost Center in the Service
25 Company. The Allocating Cost Center will then go through the
26 Assessment Process to charge the costs to the appropriate legal
27 entities.
- 28 • **Labor and Labor-Related Overheads:** Overhead processes are used to
29 bill labor and labor-related overheads such as pension costs, health care
30 costs, paid time off (e.g., vacation time, holiday, or sick time), workers’

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- 1 compensation, incentive compensation (all compensation is sponsored by
2 SPS witness Michael T. Knoll), payroll taxes, and facilities costs.
- 3 • **Legal Entity:** A generic reference to an affiliate company within the Xcel
4 Energy corporate structure.
 - 5 • **Profit Center:** An SAP data element that identifies the state (e.g.,
6 Colorado) and utility (e.g., electric, gas, steam, or common) or Joint
7 Venture Owner (e.g., Hayden Joint Venture).
 - 8 • **Settlement:** The process used by the accounting system to move charges
9 from internal orders to the specified settlement receiver. The receiver
10 could be another internal order, an allocating cost center, or a final cost
11 center.
 - 12 • **Statistical Key Figures:** The method by which the allocation ratios and
13 factors are organized in the accounting system and linked to allocating
14 cost centers to facilitate the performance of the assessment process to
15 allocate charges.
 - 16 • **Work Breakdown Structures:** Hierarchical cost collectors representing
17 work performed that includes various attributes to be used for the
18 reporting of costs.

1 **IV. ORGANIZATION AND ACCOUNTING OVERVIEW**

2 **Q. Please describe the Xcel Energy organizational structure.**

3 A. Xcel Energy is a registered holding company under the Public Utility Holding
4 Company Act of 2005 (“PUHCA 2005”). Within the Xcel Energy holding
5 company system, as of March 31, 2019, there were 93 active legal entities or
6 affiliates and 7 inactive legal entities for a total of 100. Of the 93 active legal
7 entities, 83 are included in the XES allocations. A complete list of Xcel Energy
8 subsidiaries as of March 31, 2019 is provided in Schedule Q-2, Description of
9 Company. The primary legal entities in the holding company system are the four
10 utility Operating Companies and XES, the centralized service company. Xcel
11 Energy also owns an interstate natural gas pipeline company, WestGas Interstate,
12 Inc. (“WestGas”), and three electric transmission companies through its
13 subsidiary Xcel Energy Transmission Holding Company, LLC.

14 The following is a brief description of the utility Operating Companies,
15 WestGas, and the transmission-only companies:

- 16 • SPS is an electric only utility operating company with operations in
17 New Mexico and Texas.
- 18 • Public Service Company of Colorado, a Colorado corporation
19 (“PSCo”) is an electric, gas, and thermal utility operating company,
20 with operations in Colorado.

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- 1 • Northern States Power Company, a Minnesota corporation (“NSPM”)
2 is an electric and gas utility operating company with operations in
3 Minnesota, North Dakota, and South Dakota.
- 4 • Northern States Power Company, a Wisconsin corporation (“NSPW”)
5 is an electric and gas utility operating company with operations in
6 Wisconsin and Michigan.
- 7 • WestGas is an interstate natural gas pipeline company that operates in
8 Colorado.
- 9 • Xcel Energy Southwest Transmission Company, LLC is an electric
10 transmission company that operates in the Southwest Power Pool.
- 11 • Xcel Energy Transmission Development Company, LLC is an electric
12 transmission company that operates in the Midwest Independent
13 System Operator.
- 14 • Xcel Energy West Transmission Company, LLC is an electric
15 transmission company that operates in the WestConnect planning
16 region.

17 The four Operating Companies and WestGas made up 92.1287% of the
18 revenues, 73.7912% of the assets, and 99.8239% of the employees of the Xcel
19 Energy consolidated financial position at December 31, 2018 for the 83 active
20 legal entities included in the XES allocations. The three transmission companies
21 currently do not have any employees.

22 The remaining legal entities within the Xcel Energy holding company
23 system consist of legal entities that support the operations of the four utility
24 Operating Companies and WestGas, and a small amount of non-regulated

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1 operations. For example, 1480 Welton Inc. owns a facility that PSCo uses as a
2 warehouse and that XES uses to house its accounts payable staff.

3 **Q. Please describe how Xcel Energy manages its business.**

4 A. Xcel Energy takes both the legal entity management (e.g., SPS) and the functional
5 organization management (business area, organization, and department) into
6 consideration when managing its business. As of the end of the Base Period, the
7 corporate-wide functions of Xcel Energy were organized into the following
8 business areas:

- 9 • Benefits Related;
- 10 • Chief Executive Officer;
- 11 • Corporate Secretary & Executive Services;
- 12 • Corporate Other;
- 13 • Distribution Operations;
- 14 • Energy Supply;
- 15 • Financial Operations;
- 16 • Gas Systems;
- 17 • General Counsel;
- 18 • Nuclear Generation;⁵
- 19 • Operations Services;

⁵ Not applicable to SPS's operations.

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- 1 • Transmission; and
2 • Utilities & Corporate Services.

3 All business areas can provide services to one or more companies within the Xcel
4 Energy holding company system. Thus, for example, the Distribution Operations
5 business area provides distribution O&M services for all of the Operating
6 Companies, including SPS.

7 Employees belong to, or are associated with, both a legal entity and a
8 business area. Thus, to give two examples, a distribution lineman may be an
9 employee of SPS and also be associated with the Distribution Operations business
10 area; or an information technology specialist may be an employee of XES and
11 also be associated with the Utilities & Corporate Services business area.

12 **Q. Does the Xcel Energy organizational structure include a centralized service**
13 **company?**

14 A. Yes. XES is a centralized service company. At the time Xcel Energy was formed
15 in 2000, registered holding companies such as Xcel Energy were regulated by the
16 Securities and Exchange Commission (“SEC”) under the Public Utility Holding
17 Company Act of 1935 (“PUHCA 1935”) and were permitted to form and operate
18 service companies to provide services, at cost, to utility operating companies and
19 affiliates within the holding company system. Under PUHCA 2005, Xcel Energy

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1 has retained XES, which previously had been established as New Century
2 Services, Inc. Employees who are expected to provide services to more than one
3 legal entity within the holding company system are employed by XES, which
4 provides shared or common administrative and management and some technical
5 services to Xcel Energy, the Operating Companies, and other affiliates. The
6 services provided to SPS by XES include, but are not limited to: executive
7 management, accounting, financial reporting, finance, treasury, corporate
8 communications, property services, human resources, information technology,
9 environmental, legal, regulatory, customer services, engineering, generation
10 resource planning, distribution and transmission management and support, and
11 energy supply management and support. The service company will be described
12 in detail in the Affiliate Transactions – XES section of my testimony.

13 **Q. Please explain how Xcel Energy’s organizational structure affects the flow of**
14 **costs within the holding company system and, more directly, how it affects**
15 **SPS.**

16 A. I will first discuss the SPS native costs, then the billings from XES, and, finally,
17 the billings from other affiliated interests.

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1 • **SPS Native Costs (Non-Affiliate Costs)**

2 The vast majority of costs incurred by SPS are native costs associated with
3 SPS’s provision of electric service to its customers. These costs consist of
4 the plant investment, labor, fuel, and other material costs that SPS incurs
5 for its electric utility operations that are not billed from XES or any other
6 affiliated interest. For example, the salaries of SPS employees are native
7 costs.

8 • **Billings from XES**

9 One of the underlying requirements of PUHCA 1935 and PUHCA 2005 is
10 that a centralized service company’s services be provided at cost to the
11 utility operating companies and affiliates within the holding company
12 system.⁶ The term “at cost” means the service company earns no profit on
13 the services. XES provides its services to SPS at cost under the current
14 Service Agreement. For additional information, please refer to the
15 Affiliate Transactions – XES section of my testimony.

16 SPS receives services and billings of directly assigned and allocated (or
17 indirect) costs from XES. Costs from XES that are billed to SPS can be
18 directly assigned or allocated to SPS on a total company basis. Schedule
19 H-14 shows the total billings from XES, both direct and allocated, for the
20 Base Period⁷ and Test Year. The total billings from XES are shown on
21 Attachment MLS-1.⁸ I will describe the Service Company allocation
22 methods in more detail in Section V of my testimony.

⁶ 18 Code of Federal Regulations § 35.44(b)(3).

⁷ The Base Period is April 1, 2018 through March 31, 2019.

⁸ Attachment MLS-1 provides the XES billings to SPS for the Base Period, and the adjustments made to reach the Test Year Period billings. The direct testimony of Mr. Freitas discusses adjustments made to Base Period costs.

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1 • **Billings to and from Other Affiliated Interests**

2 SPS may provide services to and bill affiliated interests other than XES,
3 and affiliated interests other than XES may provide services to and bill
4 costs to SPS. For example, SPS employees may assist PSCo with storm
5 restoration activities, or PSCo employees may help SPS with storm
6 restoration work.

7 **Q. Please describe the flow of affiliate transactions.**

8 A. To understand the flow of direct and allocated costs within the Xcel Energy
9 corporate structure, it is necessary to describe the various high-level stages that
10 costs go through in the accounting process.

11 First, within Xcel Energy, all costs originate within an operational area
12 and a legal entity. All costs are first recorded on the books of the legal entity that
13 is responsible for providing the service. Each accounting transaction includes
14 detailed information designating which operational area and legal entity is
15 performing the work. The accounting system also requires that an internal order
16 be included on all transactions recorded to the income statement. The internal
17 order contains the information to indicate how the transaction will flow through
18 the system. The settlement rule on the internal order will indicate the legal entity
19 to which the transaction will settle.

20 In the case of native costs described earlier in my testimony, they will
21 remain on the accounting records of the same entity. Accounting transactions for

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1 native expenses are recorded directly on the books of the operating company that
2 incurred the native expenses. For example, expenses related to repairing an SPS
3 customer's meter are recorded on SPS's books.

4 In the case of non-native costs incurred by one legal entity for the benefit
5 of another entity, these costs are eventually recorded on the books of the entity
6 receiving goods or services through the settlement and assessment processes
7 executed within the accounting system. Every affiliate within Xcel Energy uses
8 the same settlement and assessment processes and the same method of recording
9 transactions. For example, if SPS personnel provided emergency storm damage
10 assistance to PSCo, the transaction is first recorded on SPS's books, but the
11 transaction will include accounting information that indicates the transaction will
12 be settled to PSCo.

13 Second, all costs identified as billable are processed using the settlement
14 and/or assessment processes of the accounting system. These processes charge
15 the transactions to the legal entity that receives the services. This process
16 captures: (1) XES direct and allocated billings of all its costs to affiliated
17 interests; (2) direct billings between an Operating Company and an affiliated
18 interest other than XES; and (3) direct billings between departments within a legal
19 entity. For example, the settlement process will settle XES labor directly to the

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1 affiliated interest if the labor is a direct charge or it will send the charges to an
2 allocating cost center if the charge is to be allocated. The assessment process will
3 then clear the charges from the allocating cost center and allocate them to the
4 legal entities to which the employee is providing services along with the
5 appropriate labor and labor-related overheads. Transactions between affiliates
6 (excluding XES) are direct charges, as are charges from one business area to
7 another business area (for example, charges from the Distribution Operations
8 business area to the Energy Supply business area). After the settlement and
9 assessment processes are completed, all costs reside on the books of the legal
10 entity ultimately responsible for the charge.

11 As a result of these steps, all transactions are recorded on the books of the
12 responsible legal entity and in the appropriate Federal Energy Regulatory
13 Commission (“FERC”) account. The methods and percentages applied for the
14 jurisdictional allocations are specific to SPS and are discussed by Mr. Freitas in
15 his direct testimony.

16 **Q. Does SPS or any of its affiliated interests provide support services to**
17 **unaffiliated entities?**

18 A. No. XES provides administrative and general (“A&G”) support services only to
19 Xcel Energy and its subsidiaries. Likewise, SPS, the three other Xcel Energy

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1 Operating Companies, and the other Xcel Energy subsidiaries provide A&G
2 support services only to their Xcel Energy corporate affiliates. Thus, neither SPS
3 nor any of its affiliated interests provides A&G support services to any
4 unaffiliated legal entity.

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1 **V. AFFILIATE TRANSACTIONS – XES**

2 **Q. Please describe XES.**

3 A. XES provides shared or common administrative and management services to the
4 Operating Companies and affiliates in the Xcel Energy holding company system.
5 A service agreement is executed between XES and each Operating Company and
6 the other affiliates to which it provides services.

7 XES is staffed with individuals who provide services such as executive
8 management, finance, accounting, human resources, information technology,
9 environmental, engineering, legal, and customer services to more than one legal
10 entity within the Xcel Energy system of companies.

11 Services are provided and either direct billed or allocated to the Operating
12 Companies and other affiliates on a monthly basis.

13 SPS files an annual report with the Commission under 17.6.450.13(B)
14 NMAC listing all of its Class I transactions for the calendar year.⁹ Attachment
15 MLS-2 is a copy of Class I transactions from the annual report for the period
16 ended December 31, 2018. The total amount of transactions is shown as zero due

⁹ Class I transactions mean “the sale, lease or provision of real property, water rights or other goods or services by an affiliated interest to a public utility with which it is affiliated or by a public utility to its affiliated interest.” NMSA 1978, § 62-3-3(K).

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1 to both the income statement and balance sheet activity being included in the
2 report. The transactions between the affiliate companies result in an income
3 statement charge along with an offsetting payable or receivable being recorded on
4 the balance sheet.

5 In addition, Attachment MLS-3 is a list of SPS's Class II transactions for
6 the period ended December 31, 2018.

7 XES also files a FERC Form 60 report of its billings to the Xcel Energy
8 Operating Companies and other affiliates, including a listing of the approved
9 allocation methods, on an annual basis. A copy of the 2018 FERC Form 60 is
10 provided as Attachment MLS-4.

11 **Q. Please describe the main provisions of the Service Agreement between XES**
12 **and SPS.**

13 A. The Service Agreement is a high-level agreement that describes the services
14 provided by XES, the billing and payment information, the terms of the
15 agreement, the limitation of liability and indemnification, and miscellaneous
16 information. Appendix A to the Service Agreement provides a description of the
17 XES services provided and the methods of assignment that can be used for
18 charges to the Operating Companies and affiliates for each type of service. The

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1 substance of all XES Service Agreements is the same; only the parties to the
2 agreements differ. A copy of the Service Agreement dated September 9, 2016 is
3 provided as Attachment MLS-5.

4 **Q. Have there been changes in the Service Agreement between XES and the**
5 **Operating Companies (including SPS) related to the allocation methods since**
6 **Case No. 17-00255-UT, SPS's last completed base rate case?**

7 A. No. There have been no changes to the Service Agreement since 2016.

8 **Q. Please describe XES's overall philosophy for recording costs.**

9 A. XES's goal is to directly assign costs to the Operating Companies and affiliates
10 that use such services as often as possible. Costs that cannot be directly assigned
11 are allocated to the Operating Companies and other affiliates in accordance with
12 cost allocation methods reflected in XES's most recently filed FERC Form 60 and
13 SPS's Service Agreement with XES, which is consistent with the requirements of
14 PUHCA 2005.

15 **Q. Please describe XES direct charges.**

16 A. Direct charges occur when an employee of XES can determine that the service
17 being rendered is for the benefit of only one legal entity. As previously stated,
18 employees of XES are instructed to direct charge their labor and non-labor costs
19 whenever possible. To direct charge their costs, an employee will choose an

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1 internal order that settles directly to a second internal order that belongs to the
2 Operating Company or affiliate benefiting from the charges. This will result in
3 100% of the charges being recorded on the Operating Company or affiliate books.
4 For example, an XES employee in Financial Operations can charge an internal
5 order that relates specifically to SPS for work performed. The same process is
6 used for both O&M and Capital work.

7 **Q. Please describe XES allocated charges.**

8 A. XES allocated charges occur when services cannot be directly charged to a single,
9 specific legal entity, such as services for staff meetings, training, or other
10 activities that benefit more than one company. These costs are allocated to the
11 affiliates benefiting from the services based on allocation methods using
12 allocating cost centers to pool the costs. For example, shareholder meeting costs
13 are allocated to legal entities in the Xcel Energy holding company system at the
14 first and second tier subsidiary level, excluding intermediate holding companies,
15 discontinued operations, and minority interest affiliates using an internal order
16 that settles to an allocating cost center for this type of cost. XES allocating cost
17 centers are set up for each allocation.

18 The complete list of XES allocation methods used during the Test Year is
19 provided in Attachment MLS-6, along with examples of the services billed under

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1 those methods. Allocation methods are selected for each allocating cost center
2 based on the relationship between the services being provided and the legal
3 entities benefiting from those services.

4 For example, allocating cost center 200063 is used for executive corporate
5 governance services. These services cannot be directly assigned to a single legal
6 entity. Thus, XES uses a three-factor formula of assets, revenue, and number of
7 employees to distribute corporate governance costs. The formula produces a
8 percentage of costs that are allocated to the various affiliates, including the parent
9 company. The three-factor formula reflects the complexity, risk, and overall
10 business activity levels that drive corporate governance costs and measures the
11 benefits received from those activities. The formula includes assets because the
12 greater the value of a subsidiary's assets, the more focus will be placed on that
13 subsidiary's operations due to its relative effect on the consolidated business and
14 balance sheet, and the greater the benefit to that subsidiary from corporate
15 governance activities. Similarly, the formula considers revenue because the larger
16 a subsidiary's revenue, the more focus will be placed on that subsidiary's
17 operations due to its relative effect on the consolidated business, income
18 statement, and statement of cash flow, and the subsidiary will benefit accordingly

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1 from the corporate governance activities. Finally, the relative number of
2 employees is a good measure of the time and attention management must pay to
3 the subsidiary's operations in relation to the consolidated operations.
4 Collectively, these three factors are rationally related to the level of corporate
5 governance services provided and the benefits received from those services.

6 **Q. How are Supervisory Control and Data Acquisition (“SCADA”) costs**
7 **allocated among the Operating Companies?¹⁰**

8 A. The costs for the SCADA system are allocated among the Operating Companies
9 using the applicable allocating internal order. SPS uses one allocating internal
10 order for the SCADA system to allocate costs associated with Business Systems'
11 O&M costs for the system. The allocation was developed to distribute these labor
12 and non-labor costs among production, transmission, and distribution FERC
13 accounts. The allocator is based on the number of remote terminal units (“RTU”)
14 related to the applicable business area. The allocator used in the current year is
15 based on the previous years' actual number of RTUs.

¹⁰ The SCADA system allows for communication with field devices, substations, and generating units to allow for remote control in response to planned and unplanned events. The SCADA System used by SPS and the other Operating Companies is owned by XES.

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1 **Q. Have you provided the SCADA allocating internal order methodology and**
2 **factors?**

3 A. Yes. The Test Year allocating internal order methodology and factors for the
4 SCADA Electric Management System are provided in Attachment MLS-7.

5 **Q. Are the XES allocation methods, factors, and processes used for the Test**
6 **Year reflective of actual costs?**

7 A. Yes. The XES allocation methods, factors, and processes in effect during the Test
8 Year are those used to allocate the actual costs. The XES allocation factors
9 became effective in April 2018 (based on data as of December 31, 2017) and are
10 used for the Test Year.

11 **Q. How often does XES update its allocation factors?**

12 A. The frequency of the updates depends on the individual components of the
13 allocation factors. I'll address each component separately.

14 Allocation Methods – XES updates its allocation methods as needed
15 during the year. There is already an extensive list of allocation methods and XES
16 has not had to add very many since the initial list was developed under PUHCA
17 1935 and approved by the SEC.

18 Allocation Statistics, Allocation Ratios, and Allocation Percentages – XES
19 annually updates all three components to determine the percent to be allocated to

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1 each legal entity included in the statistical key figures. These components are
2 updated for April business based on the prior year calendar statistics.¹¹ XES may
3 also update the statistics used in the allocation ratios to determine new allocation
4 percentages if there is a significant change in the statistics, driven by the addition
5 or deletion of a legal entity. Attachment MLS-8 provides the April 2018 statistics
6 for each allocating cost center and the Test Year calculations for each allocating
7 cost center.

8 Allocating Cost Centers – The allocating cost centers used to collect and
9 allocate actual expenses are charged each month based on the expenses incurred
10 each month. The allocating cost centers used in the budget process are based on
11 the results of the budget creation.

12 **Q. What does XES do to ensure that costs are recorded correctly?**

13 A. XES takes the following steps to ensure that costs are recorded and budgeted
14 correctly:

- 15 • XES Policies and Procedures were developed and continue to be
16 implemented. These policies and procedures are available on the Xcel
17 Energy internal website for access by all Xcel Energy personnel (see
18 Attachment MLS-9);

¹¹ XES annually updates four Allocation Statistics and Allocation Percentages related to the Joint Operating Agreement and trading activities starting with January business. The statistics are based off of the prior calendar year.

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- 1 • the Audit Services department performs compliance audits on sections of
2 XES Policies and Procedures and the application thereof;

- 3 • personnel within the Financial Performance and Controls organization,
4 including the XES Accounting department, regularly review XES actual
5 and budgeted charges and may request adjustments where necessary;

- 6 • XES employees are required to complete online training through Xcel
7 Energy's Learning Management System, an online training tool. Training
8 can also be provided either in a classroom setting, online via Xcel
9 Energy's internal website, or on an individual basis;

- 10 • the FERC reviews XES's FERC Form No. 60 submissions and may
11 review allocations during audits; and

- 12 • independent external auditors, Deloitte and Touche, LLC, annually audit
13 the books and records of Xcel Energy and its affiliates.

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1 cost of each SPS asset is calculated, including book depreciation, deferred taxes,
2 property taxes, and the return on investment. The return on investment associated
3 with the shared assets is included to ensure that SPS ratepayers are not
4 subsidizing other affiliates and vice versa. The associated costs are transferred
5 from SPS to XES by crediting FERC Account 922, Administrative and General
6 Transferred Credit, and debiting inter-company receivables. The shared asset
7 costs that are associated with facilities are accumulated in the facilities clearing
8 account on XES's books, and the shared asset costs associated with network
9 equipment are allocated to the affiliates benefitting from the use of the network
10 equipment assets using an internal order that settles to allocating cost centers.

11 The XES facilities clearing account also holds charges associated with
12 XES's use of NSPM-owned facility assets, NSPW-owned facility assets, and
13 PSCo-owned facility assets, as well as the costs of XES leased assets and the
14 O&M expenses for the leased and owned facilities. The costs accumulated in the
15 XES facilities allocating cost centers are programmed to follow labor costs. The
16 XES facilities process is explained in more detail in the Labor and Labor
17 Overheads subsection of my testimony (VII.A).

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1 **Q. Does SPS have non-fuel affiliate transactions with affiliated interests other**
2 **than XES?**

3 A. Yes. From time to time, SPS engages in transactions with affiliated interests
4 other than XES. These services are provided at cost and primarily include
5 services for emergency transmission and distribution O&M activities (non-
6 support services). Non-fuel affiliate transactions are and will be direct billed to
7 the affiliated interest receiving the services and can include labor, labor
8 overheads, materials and supplies, and vehicle costs. This method of assigning
9 costs to the affiliated interest ensures that the payments to or by SPS are
10 reasonable and do not result in any ratepayer subsidization. SPS is billed by the
11 affiliated interest and SPS pays the affiliated interest in the normal course of
12 business. In other instances, SPS may provide services to affiliated interests. In
13 these circumstances, SPS bills the affiliated interest and receives payment from
14 the affiliated interest in the normal course of business.

15 **Q. What is the dollar amount of SPS's affiliate expense transactions with the**
16 **other Operating Companies or affiliated interests (other than XES) during**
17 **the Test Year?**

18 A. SPS's affiliate expense transactions for the Test Year are as follows:

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- 1 a. *SPS charges to its affiliated interests.* For the Test Year, SPS’s affiliate
2 transaction expense charges to other affiliated interests (other than XES)
3 are charges to NSPM, NSPW, and PSCo totaling \$47,744 New Mexico
4 Retail.¹² Please see Schedule H-14 for a list of transactions.
- 5 b. *Charges from SPS’s affiliated interests (other than XES) to SPS.* The Test
6 Year expense charges from other affiliated interests (other than XES) to
7 SPS are charges from NSPM, NSPW, and PSCo totaling \$63,571 New
8 Mexico Retail.¹³ Please see Schedule H-14 for a list of transactions.
- 9 These costs are fully distributed costs including labor overheads (*e.g.*, pension,
10 insurance, payroll taxes) and facilities charges that are added to provide a fully
11 loaded labor charge for the work performed.

¹² \$183,562 total SPS before jurisdictional allocations, or “Total Company.”

¹³ \$210,820 Total Company.

1 **VII. LABOR, LABOR-RELATED, AND OTHER OVERHEADS**

2 **Q. Does XES charge operating companies and affiliates for overhead costs?**

3 A. Yes. XES charges for labor overheads, labor-related overheads, purchase and
4 warehouse overheads, and fleet overheads that are applicable to XES, the
5 Operating Companies, and other affiliates. The processes described here show
6 how overheads are applied to actual costs.

7 **A. Labor and Labor Overheads**

8 **Q. Please generally describe the labor reporting process.**

9 A. In order to understand the labor overhead process and the labor-related overheads,
10 it is important to understand the labor process.

11 XES and the other Xcel Energy legal entities, including the Operating
12 Companies, use a positive time reporting process. Employees bill their time
13 based on positive time reporting through the labor distribution system. Positive
14 time reporting requires each employee to report the hours worked each day.
15 Employees' time is reported on the basis of accounting codes related to specific
16 legal entities that are to be billed.

17 All bi-weekly and semi-monthly employees' labor expenses are recorded
18 into the time reporting system, all of which feed into the labor distribution system.
19 The employee submitting their time is responsible for coding the account numbers

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1 to charge the appropriate legal entity and functional area (capital, operations,
2 maintenance, clearing, purchasing, warehousing, etc.). The employee's
3 supervisor or manager is responsible for reviewing and approving all time entries
4 and verifying that the employee has used the correct account number for each
5 transaction.

6 The labor distribution system used for bi-weekly employees includes the
7 distribution of actual paid and accrued labor dollars/hours to the account numbers
8 charged based on the hours worked. Accrual of payroll facilitates the recording of
9 labor costs on a calendar month basis. The accrual includes any reversal of the
10 prior month's accrual. The charge of labor dollars for semi-monthly employees to
11 account numbers is based on a distribution of the monthly salary of the employee.

12 **Q. Please explain the labor overhead process.**

13 A. XES and the Operating Companies use a labor overhead process to capture and
14 bill labor overhead costs such as: pensions and benefits, worker's compensation,
15 paid time off, incentive compensation, and payroll taxes. Labor overheads are
16 allocated within a legal entity by calculating a separate loading rate for each labor
17 overhead cost category by type of employee. Benefit employees have the
18 following labor overhead cost categories: pension and insurance (401(k) match,
19 retirement related consulting, active healthcare, life and long-term disability

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1 (“LTD”) insurance premiums, miscellaneous benefit programs and LTD benefits
2 for former or inactive employees before retirement, as well as the service cost
3 portion of qualified pension, non-qualified pension and retiree healthcare); non-
4 productive labor (vacation, sick, holiday, etc.); worker’s compensation; incentive
5 compensation; benefits non-service; labor and expenses of the Human Resources
6 service center; and payroll taxes. Non-benefit employees’ labor overhead consists
7 only of payroll taxes. A benefit employee generally is a full-time employee. A
8 non-benefit employee generally is a part-time employee.

9 Legal entity specific labor overhead rates for each category are entered
10 into the accounting system and applied to productive labor charges as appropriate
11 by resource type. Labor overhead loadings applied to labor charges follow the
12 labor charges. For example, XES labor overheads follow XES labor and SPS
13 labor overheads follow SPS labor.

14 For each legal entity and each cost category, the labor overhead
15 percentage is determined based on a single-factor formula derived from the
16 relationship of total forecasted costs for the category divided by total forecasted
17 productive labor costs. A monthly process is performed to bring the labor
18 overhead allocating cost centers to zero. Labor overheads are updated on a
19 monthly basis for actual expenses using the latest forecast information.

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1 agreements/ contracts for strategic supplier partnerships and service contracts;
2 monitoring supplier performance; and managing purchase records, supplier
3 qualification records, and the supplier diversity program. Costs are collected in
4 allocating cost centers on the Service Company and the Operating Companies and
5 cleared using an overhead loading based on a costing sheet, cost element, and
6 accounts payable document type criterion.

7 **Q. Please describe the warehouse loading process.**

8 A. Inventory warehousing costs, including labor, supervision, materials, and supplies
9 are allocated through pools specific to business areas as an overhead on materials
10 and supplies as materials and supplies are issued from or returned to a storeroom
11 or warehouse. Overhead costs for inventory items as noted above and associated
12 adjustments are accumulated within the Supply Chain warehouse pools. These
13 accumulated overhead costs are allocated to material issuances/returns from the
14 storeroom using the same account coding where the materials were originally
15 charged. Costs are collected in allocating cost centers on the Service Company
16 and Operating Companies, then cleared using a warehouse overhead loading
17 based on a costing sheet, cost element, and accounts payable document type
18 criterion.

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1 **Q. Please describe the fleet clearing process.**

2 A. The Fleet Services department in the Service Company is responsible for
3 managing the fleet assets owned by the operating companies. Fleet assets are
4 vehicle units that are organized into fleet work centers, which group together
5 vehicles similar in nature for a specific business function within an Operating
6 Company. The SAP Work Manager application records the utilization of the fleet
7 assets and allocates the cost to the business area of operating companies and
8 affiliates for the costs of using vehicles or associated equipment using fleet
9 activity rates based on work centers. Fleet costs included in the calculation of the
10 monthly billing rate include: licensing taxes and fees, lease costs, depreciation,
11 material and labor costs for maintenance and repair, fuel, labor loadings, and
12 overhead for overall management of the Fleet Services department that includes
13 labor, facilities, insurance, utilities, computer, phone, and office supplies. Costs
14 are collected in allocating cost centers for the Service Company and Operating
15 Companies which are cleared using an overhead fleet rate based on the weighted
16 vehicle type to the respective business area.

17 **Q. Does this conclude your pre-filed direct testimony?**

18 A. Yes.

Line No.	FERC Account Number	Account Name or Type of Service	Total Company Base Period	Adjustments	Total Company Test Year Period	Allocator (Name)	TY Allocator (%)	NM Retail Test Year Period
1	408.1	Tax Other Than Income Tax	\$ 3,465,678	\$ (14,165)	\$ 3,451,513	LABOR	0.282609	\$ 975,428
2	408.2	Tax Other Than Income Tax	2,273	(782)	1,491	LABOR	0.282609	421
3	500	Operation supervision and engineering	626,472	(14,462)	612,010	12CP-PROD	0.276813	169,412
4	501	Fuel	776,983	(20,194)	756,789	ENERGY	0.286880	217,107
5	502	Steam expenses	(10,256)	180	(10,076)	12CP-PROD	0.276813	(2,789)
6	506	Miscellaneous steam power expenses	4,547,822	(84,764)	4,463,058	12CP-PROD	0.276813	1,235,432
7	507	Rents	4,384,747	(15,182)	4,369,565	12CP-PROD	0.276813	1,209,552
8	510	Maintenance supervision and engineering	4,325	(55)	4,270	12CP-PROD	0.276813	1,182
9	512	Maintenance of boiler plant	896,845	(15,961)	880,885	ENERGY	0.286880	252,708
10	513	Maintenance of electric plant	510,746	(11,517)	499,229	ENERGY	0.286880	143,219
11	514	Maintenance of miscellaneous steam plant	943,847	(17,228)	926,619	12CP-PROD	0.276813	256,500
12	546	Operation supervision and engineering	184,003	(526)	183,477	12CP-PROD	0.276813	50,789
13	549	Miscellaneous other power generation expenses	154,747	(1,512)	153,235	12CP-PROD	0.276813	42,417
14	550	Rents	378,622	(1,087)	377,535	12CP-PROD	0.276813	104,507
15	551	Maintenance supervision and engineering	162	0	162	12CP-PROD	0.276813	45
16	552	Maintenance of structures	6,242	(153)	6,089	12CP-PROD	0.276813	1,685
17	553	Maintenance of generating and electric plant	26,743	(1,282)	25,461	12CP-PROD	0.276813	7,048
18	554	ES Business Resources	141,775	(2,660)	139,115	12CP-PROD	0.276813	38,509
19	556	System control and load dispatching	952,763	(17,577)	935,186	12CP-PROD	0.276813	258,872
20	557	Other expenses	1,393,204	(181,068)	1,212,136	12CP-PROD	0.276813	335,535
21	560	Operation supervision and engineering	8,356,812	(182,128)	8,174,684	PIS-TRAN	0.209450	1,712,184
22	561.2	Load dispatch	1,426,870	(10,671)	1,416,199	12CP-TRAN	0.204492	289,601
23	561.5	Reliability planning and standards development	31	0	31	12CP-TRAN	0.204492	6
24	561.6	Transmission service studies	15,250	(752)	14,497	12CP-TRAN	0.204492	2,965
25	562	Station expenses	13,340	0	13,340	PIS-TRAN	0.209450	2,794
26	563	Overhead line expenses	9,681	(397)	9,284	PIS-TRAN	0.209450	1,945
27	566	Miscellaneous transmission expenses	610,184	(5,213)	604,971	PIS-TRAN	0.209450	126,711
28	567	Rents	1,485,582	(5,446)	1,480,136	PIS-TRAN	0.209450	310,014
29	568	Maintenance supervision and engineering	7,441	(578)	6,863	PIS-TRAN	0.209450	1,437
30	570	Maintenance of station equipment	234	0	234	PIS-TRAN	0.209450	49
31	571	Maintenance of overhead lines	31,925	(557)	31,368	PIS-TRAN	0.209450	6,570
32	575.1	Operation Supervision	138,856	(2,536)	136,320	ENERGY	0.286880	39,107
33	575.2	Day	265,679	(5,319)	260,360	ENERGY	0.286880	74,718
34	575.5	Ancillary services market administration	21,216	(486)	20,730	ENERGY	0.286880	5,947
35	575.6	Market monitoring and compliance	35,876	(711)	35,165	ENERGY	0.286880	10,088
36	575.8	Facilities & Real Estate	34,474	(125)	34,349	ENERGY	0.286880	9,854
37	580	Operation supervision and engineering	632,976	(27,153)	605,823	PIS-DIST	0.357039	216,302
38	581	Load dispatching	278,474	(1,421)	277,054	PIS-DIST	0.357039	98,919
39	582	Station expenses	20,180	(4)	20,176	PIS-DIST	0.357039	7,203
40	583	Overhead line expenses	104,129	(1,705)	102,423	PIS-DIST	0.357039	36,569
41	586	Meter expenses	150,377	(3,057)	147,320	PIS-DIST	0.357039	52,599
42	587	Customer installations expenses	442	0	442	PIS-DIST	0.357039	158
43	588	Miscellaneous distribution expenses	1,806,158	(13,625)	1,792,533	PIS-DIST	0.357039	640,003
44	589	Rents	1,457,993	(4,471)	1,453,522	PIS-DIST	0.357039	518,963
45	590	Maintenance supervision and engineering	16,919	(304)	16,615	PIS-DIST	0.357039	5,932
46	592	Maintenance of station equipment	1,391	(0)	1,390	PIS-DIST	0.357039	496
47	593	Maintenance of overhead lines	196,481	(3,183)	193,298	PIS-DIST	0.357039	69,015
48	901	Supervision	19,599	9,412	29,011	CUST-AVG	0.310815	9,017
49	902	Meter reading expenses	461,501	(794)	460,707	CUST-AVG	0.310815	143,195
50	903	Customer records and collection expenses	3,439,146	(54,038)	3,385,108	CUST-AVG	0.310815	1,052,141
51	908	Customer assistance expenses	123,802	(13,694)	110,108	CUST-AVG	0.310815	34,223
52	909	Informational and instruction advertising expense	245,149	(146)	245,002	CUST-RET	0.310820	76,152
53	910	Marketing & Sales	6,519	(36)	6,483	CUST-RET	0.310820	2,015
54	912	Demonstrating and selling expenses	266	0	266	CUST-AVG	0.310815	83
55	920	Administrative and general salaries	26,711,850	(4,544,214)	22,167,637	LABXAG	0.277614	6,154,052
56	921	Office supplies and expenses	18,444,048	(54,578)	18,389,470	LABXAG	0.277614	5,105,179
57	922	Administrative expenses transferred	(185,713)	0	(185,713)	LABXAG	0.277614	(51,557)
58	923	Outside services employed	9,045,536	(4,273)	9,041,263	LABXAG	0.277614	2,509,984
59	924	Property insurance	8,569	0	8,569	PIS-NET	0.265442	2,275
60	925	Injuries and damages	2,107,773	(756)	2,107,018	LABXAG	0.277614	584,938
61	926	Employee pensions and benefits	13,245,456	848,159	14,093,615	LABXAG	0.277614	3,912,588
62	928	Regulatory commission expenses	1,040	0	1,040	CUST-AVG	0.310815	323
63	930.1	General advertising expenses	858,440	(858,440)	-	PIS-PTD	0.264371	-
64	930.2	Miscellaneous general expenses	1,043,239	(1,258)	1,041,981	PIS-PTD	0.264371	275,469
65	931	Rents	12,284,087	(14,435)	12,269,652	PIS-PTD	0.264371	3,243,735
66	935	Maintenance of general plant	185,214	0	185,214	PIS-GEN	0.278228	51,532
67			\$ 124,552,324	\$ (5,358,928)	\$ 119,193,396			\$ 32,643,074

Southwestern Public Service Company
Class 1 Transactions
Annual Report - Calendar Year 2018
Pursuant to New Mexico Public Regulation Commission
Rule 450.13(B)
Charges to SPS from NSP-Minnesota

FERC Account Number	Account Name or Type of Service	Service Billing	Total Company (Dollars Transacted)
107	CONSTRUCTION WORK IN PROGRESS	\$ 19,791	\$ 19,791
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	(166,518)	(166,518)
408	TAXES OTHER THAN INCOME	68	68
426.1-426.5	OTHER INCOME DEDUCTIONS	9	9
500-515	STEAM GENERATION EXPENSE	93,791	93,791
546-557	OTHER POWER GENERATION EXPENSE	283	283
560-574	ELECTRIC TRANSMISSION EXPENSE	4,685	4,685
580-598	ELECTRIC DISTRIBUTION EXPENSE	32,535	32,535
901-905	CUSTOMER ACCOUNTS EXPENSE	9,546	9,546
920-935	ADMINISTRATIVE AND GENERAL EXPENSE	5,810	5,810
	TOTAL	\$ -	\$ -

Southwestern Public Service Company
Class 1 Transactions
Annual Report - Calendar Year 2018
Pursuant to New Mexico Public Regulation Commission
Rule 450.13(B)
Charges to SPS from NSP-Wisconsin

FERC Account Number	Account Name or Type of Service	Service Billing	Total Company (Dollars Transacted)
107	CONSTRUCTION WORK IN PROGRESS	\$ 658	\$ 658
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	(19,515)	(19,515)
408	TAXES OTHER THAN INCOME	1	1
426.1-426.5	OTHER INCOME DEDUCTIONS	244	244
500-515	STEAM GENERATION EXPENSE	247	247
560-574	ELECTRIC TRANSMISSION EXPENSE	187	187
580-598	ELECTRIC DISTRIBUTION EXPENSE	17,401	17,401
901-905	CUSTOMER ACCOUNTS EXPENSE	673	673
920-935	ADMINISTRATIVE AND GENERAL EXPENSE	104	104
	TOTAL	\$ -	\$ -

Southwestern Public Service Company
Class 1 Transactions
Annual Report - Calendar Year 2018
Pursuant to New Mexico Public Regulation Commission
Rule 450.13(B)
Charges to SPS from Public Service Company of Colorado

FERC Account Number	Account Name or Type of Service	Service Billing	Total Company (Dollars Transacted)
107	CONSTRUCTION WORK IN PROGRESS	\$ 388,492	\$ 388,492
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	(471,964)	(471,964)
408	TAXES OTHER THAN INCOME	12	12
500-515	STEAM GENERATION EXPENSE	40,699	40,699
546-557	OTHER POWER GENERATION EXPENSE	186	186
560-574	ELECTRIC TRANSMISSION EXPENSE	4,389	4,389
580-598	ELECTRIC DISTRIBUTION EXPENSE	25,021	25,021
901-905	CUSTOMER ACCOUNTS EXPENSE	4,557	4,557
920-935	ADMINISTRATIVE AND GENERAL EXPENSE	8,608	8,608
	TOTAL	\$ -	\$ -

Southwestern Public Service Company
Class 1 Transactions
Annual Report - Calendar Year 2018
Pursuant to New Mexico Public Regulation Commission
Rule 450.13(B)
Charges to SPS from Xcel Energy Services, Inc.

FERC Account Number	Account Name or Type of Service	Service Billing	Total Company (Dollars Transacted)
107	CONSTRUCTION WORK IN PROGRESS	\$ 52,208,670	\$ 52,208,670
108	ACCUMULATED PROVISION FOR DEPRECIATION	1,712,924	1,712,924
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	(195,078,416)	(195,078,416)
130-176	CURRENT AND ACCRUED ASSETS	(1,352)	(1,352)
181-190	DEFERRED DEBITS	3,599,544	3,599,544
231-245	CURRENT AND ACCRUED LIABILITIES	3,925,595	3,925,595
408-409	TAXES	3,794,588	3,794,588
417-421	OTHER INCOME	(284,030)	(284,030)
426.1-426.5	OTHER INCOME DEDUCTIONS	2,028,648	2,028,648
427-432	INTEREST CHARGES	1,072,852	1,072,852
500-515	STEAM GENERATION EXPENSE	14,873,993	14,873,993
546-557	OTHER POWER GENERATION EXPENSE	4,022,770	4,022,770
560-574	ELECTRIC TRANSMISSION EXPENSE	10,495,988	10,495,988
575.1-575.8	REGIONAL MARKET EXPENSE	561,646	561,646
580-598	ELECTRIC DISTRIBUTION EXPENSE	5,877,443	5,877,443
901-905	CUSTOMER ACCOUNTS EXPENSE	5,581,082	5,581,082
908-910	CUSTOMER SERVICE AND INFORMATIONAL EXPENSE	451,457	451,457
911-916	SALES EXPENSE	768	768
920-935	ADMINISTRATIVE AND GENERAL EXPENSE	85,155,830	85,155,830
	TOTAL	\$ -	\$ -

Southwestern Public Service Company
Class 1 Transactions
Annual Report - Calendar Year 2018
Pursuant to New Mexico Public Regulation Commission
Rule 450.13(B)
Charges from SPS to NSP-Minnesota

FERC Account Number	Account Name or Type of Service	Service Billing	Total Company (Dollars Transacted)
107	CONSTRUCTION WORK IN PROGRESS	\$ 2,991	\$ 2,991
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	(15,878)	(15,878)
408	TAXES OTHER THAN INCOME	3	3
500-515	STEAM GENERATION EXPENSE	532	532
546-557	OTHER POWER GENERATION EXPENSE	581	581
560-575	ELECTRIC TRANSMISSION EXPENSE	2,034	2,034
580-598	ELECTRIC DISTRIBUTION EXPENSE	6,709	6,709
750-769	NATURAL GAS PRODUCTION EXPENSE	56	56
871-894	GAS DISTRIBUTION EXPENSE	1,963	1,963
901-905	CUSTOMER ACCOUNTS EXPENSES	620	620
920-935	ADMINISTRATIVE AND GENERAL EXPENSES	389	389
	TOTAL	\$ -	\$ -

Southwestern Public Service Company
Class 1 Transactions
Annual Report - Calendar Year 2018
Pursuant to New Mexico Public Regulation Commission
Rule 450.13(B)
Charges from SPS to NSP-Wisconsin

FERC Account Number	Account Name or Type of Service	Service Billing	Total Company (Dollars Transacted)
107	CONSTRUCTION WORK IN PROGRESS	\$ 685	\$ 685
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	(1,760)	(1,760)
560-575	ELECTRIC TRANSMISSION EXPENSE	185	185
580-598	ELECTRIC DISTRIBUTION EXPENSE	556	556
871-894	GAS DISTRIBUTION EXPENSE	148	148
901-905	CUSTOMER ACCOUNTS EXPENSES	117	117
920-935	ADMINISTRATIVE AND GENERAL EXPENSES	69	69
	TOTAL	\$ -	\$ -

Southwestern Public Service Company
Class 1 Transactions
Annual Report - Calendar Year 2018
Pursuant to New Mexico Public Regulation Commission
Rule 450.13(B)
Charges from SPS to Public Service Company of Colorado

FERC Account Number	Account Name or Type of Service	Service Billing	Total Company (Dollars Transacted)
107	CONSTRUCTION WORK IN PROGRESS	\$ 2,426	\$ 2,426
146	ACCOUNTS RECEIVABLE FROM ASSOCIATED COMPANIES	(187,271)	(187,271)
408	TAXES OTHER THAN INCOME	(4)	(4)
415-421.1	OTHER INCOME	105	105
500-515	STEAM GENERATION EXPENSE	560	560
535-545	HYDRO POWER GENERATION EXPENSE	35,173	35,173
546-557	OTHER POWER GENERATION EXPENSE	821	821
560-575	ELECTRIC TRANSMISSION EXPENSE	17,281	17,281
580-598	ELECTRIC DISTRIBUTION EXPENSE	116,105	116,105
850-870	TRANSMISSION EXPENSES	208	208
871-894	GAS DISTRIBUTION EXPENSE	12,504	12,504
901-905	CUSTOMER ACCOUNTS EXPENSES	1,329	1,329
911-917	SALES EXPENSES	92	92
920-935	ADMINISTRATIVE AND GENERAL EXPENSES	671	671
	TOTAL	\$ -	\$ -

Southwestern Public Service Company
2018 Class II Transactions
For 12 months ended December 31, 2018

FERC	FERC Description	Transaction Description	Amount
23300	Notes Payable to Assc. Co.	SPS Repaying XES UMP	(595,000,000)
23300	Notes Payable to Assc. Co.	Intercompany borrowing from XES to SPS	595,000,000
14500	Notes Receivable Assc. Co.	SPS contribution into UMP	(285,000,000)
14500	Notes Receivable Assc. Co.	XES UMP Repaying SPS	350,000,000
41900	Int & Dividend Income	Interest on Intercompany borrowing	235,506
43000	Interest on Debt to Assc	Interest on Intercompany borrowing	1,638,286

Legend

Xcel Energy Services Inc (XES)
Utility Money Pool (UMP)
Southwestern Public Service Company (SPS)

THIS FILING IS	
Item 1: <input checked="" type="checkbox"/> An Initial (Original) Submission	OR <input type="checkbox"/> Resubmission No. ____

Form 60 Approved
OMB No. 1902-0215
Expires 05/31/2019



FERC FINANCIAL REPORT

FERC FORM No. 60: Annual Report of Centralized Service Companies

This report is mandatory under the Public Utility Holding Company Act of 2005, Section 1270, Section 309 of the Federal Power Act and 18 C.F.R. § 366.23. Failure to report may result in criminal fines, civil penalties, and other sanctions as provided by law. The Federal Energy Regulatory Commission does not consider this report to be of a confidential nature.

Exact Legal Name of Respondent (Company) Xcel Energy Services Inc.	Year of Report Dec 31, <u>2018</u>
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GENERAL INSTRUCTIONS FOR FILING FERC FORM NO. 60

I. Purpose

Form No. 60 is an annual regulatory support requirement under 18 CFR 369.1 for centralized service companies. The report is designed to collect financial information from centralized service companies subject to the jurisdiction of the Federal Energy Regulatory Commission. The report is considered to be a non-confidential public use form.

II. Who Must Submit

Unless the holding company system is exempted or granted a waiver by Commission rule or order pursuant to §§ 18 CFR 366.3 and 366.4 of this chapter, every centralized service company (see § 367.2) in a holding company system must prepare and file electronically with the Commission the FERC Form No. 60 then in effect pursuant to the General Instructions set out in this form.

III. How to Submit

Submit FERC Form No. 60 electronically through the Form No. 60 Submission Software. Retain one copy of each report for your files. For any resubmissions, submit the filing using the Form No. 60 Submission Software including a justification. Respondents must submit the Corporate Officer Certification electronically.

IV. When to Submit

Submit FERC Form No. 60 according to the filing date contained § 18 CFR 369.1 of the Commission's regulations.

V. Preparation

Prepare this report in conformity with the Uniform System of Accounts (18 CFR 367) (USof A). Interpret all accounting words and phrases in accordance with the USof A.

VI. Time Period

This report covers the entire calendar year.

VII. Whole Dollar Usage

Enter in whole numbers (dollars) only, except where otherwise noted. The amounts shown on all supporting pages must agree with the amounts entered on the statements that they support. When applying thresholds to determine significance for reporting purposes, use for balance sheet accounts the balances at the end of the current reporting period, and use for statement of income accounts the current year's amounts.

VIII. Accurateness

Complete each question fully and accurately, even if it has been answered in a previous report. Enter the word "None" where it truly and completely states the fact.

IX. Applicability

For any page(s) that is not applicable to the respondent, enter "NONE," or "Not Applicable" in column (c) on the List of Schedules, page 2.

X. Date Format

Enter the month, day, and year for all dates. Use customary abbreviations. The "Resubmission Date" included in the header of each page is to be completed only for resubmissions (see III. above).

XI. Number Format

Generally, except for certain schedules, all numbers, whether they are expected to be debits or credits, must be reported as positive. Numbers having a sign that is different from the expected sign must be reported by use of a minus sign.

XII. Required Entries

Do not make references to reports of previous years or to other reports instead of required entries, except as specifically authorized.

XIII. Prior Year References

Wherever (schedule) pages refer to figures from a previous year, the figures reported must be based upon those shown by the report of the previous year, or an appropriate explanation given as to why the different figures were used.

XIV. Where to Send Comments on Public Reporting Burden

The public reporting burden for the Form No. 60 collection of information is estimated to average 75 hours per response, including

- the time for reviewing instructions, searching existing data sources,
- gathering and maintaining the data-needed, and
- completing and reviewing the collection of information.

Send comments regarding these burden estimates or any aspect of this collection of information, including suggestions for reducing burden, to:

Federal Energy Regulatory Commission, (Attention: Information Clearance Officer, CIO),
888 First Street NE,
Washington, DC 20426
or by email to DataClearance@ferc.gov

And to:

Office of Information and Regulatory Affairs,
Office of Management and Budget, Washington, DC 20503 (Attention: Desk Office for the Federal
Energy Regulatory Commission).
Comments to OMB should be submitted by email to: oira_submission@omb.eop.gov

No person shall be subject to any penalty if any collection of information does not display a valid control number (44 U.S.C. 3512(a)).

DEFINITIONS
I. Respondent -- The person, corporation, or other legal entity in whose behalf the report is made.

**FERC FORM NO. 60
ANNUAL REPORT FOR SERVICE COMPANIES**

IDENTIFICATION		
01 Exact Legal Name of Respondent Xcel Energy Services Inc.		02 Year of Report Dec 31, <u>2018</u>
03 Previous Name (If name changed during the year)		04 Date of Name Change / /
05 Address of Principal Office at End of Year (Street, City, State, Zip Code) 414 Nicollet Mall, Minneapolis, MN 55401		06 Name of Contact Person Jeffrey S. Savage
07 Title of Contact Person Senior Vice President, Controller		08 Address of Contact Person 414 Nicollet Mall, Minneapolis, MN 55401
09 Telephone Number of Contact Person (612) 330-5658		10 E-mail Address of Contact Person Jeffrey.S.Savage@xcelenergy.com
11 This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission		12 Resubmission Date (Month, Day, Year) / /
13 Date of Incorporation 04/02/1997	14 If Not Incorporated, Date of Organization / /	
15 State or Sovereign Power Under Which Incorporated or Organized DELAWARE		
16 Name of Principal Holding Company Under Which Reporting Company is Organized: Xcel Energy, Inc.		
CORPORATE OFFICER CERTIFICATION		
The undersigned officer certifies that: I have examined this report and to the best of my knowledge, information, and belief all statements of fact contained in this report are correct statements of the business affairs of the respondent and the financial statements, and other financial information contained in this report, conform in all material respects to the Uniform System of Accounts.		
17 Name of Signing Officer Jeffrey S. Savage	19 Signature of Signing Officer	20 Date Signed (Month, Day, Year)
18 Title of Signing Officer Senior Vice President, Controller	Jeffrey S. Savage	04/29/2019

Name of Respondent Xcel Energy Services Inc.		This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
List of Schedules and Accounts				
1. Enter in Column (c) the terms "None" or "Not Applicable" as appropriate, where no information or amounts have been reported for certain pages.				
Line No.	Description (a)	Page Reference (b)	Remarks (c)	
1	Schedule I - Comparative Balance Sheet	101-102		
2	Schedule II - Service Company Property	103	None	
3	Schedule III - Accumulated Provision for Depreciation and Amortization of Service Company Property	104	None	
4	Schedule IV - Investments	105		
5	Schedule V - Accounts Receivable from Associate Companies	106		
6	Schedule VI - Fuel Stock Expenses Undistributed	107	None	
7	Schedule VII - Stores Expense Undistributed	108	None	
8	Schedule VIII - Miscellaneous Current and Accrued Assets	109	None	
9	Schedule IX - Miscellaneous Deferred Debits	110		
10	Schedule X - Research, Development, or Demonstration Expenditures	111	None	
11	Schedule XI - Proprietary Capital	201		
12	Schedule XII - Long-Term Debt	202	None	
13	Schedule XIII - Current and Accrued Liabilities	203		
14	Schedule XIV - Notes to Financial Statements	204		
15	Schedule XV - Comparative Income Statement	301-302		
16	Schedule XVI - Analysis of Charges for Service - Associate and Nonassociate Companies	303-306		
17	Schedule XVII - Analysis of Billing – Associate Companies (Account 457)	307		
18	Schedule XVIII – Analysis of Billing – Non-Associate Companies (Account 458)	308	None	
21	Schedule XIX - Miscellaneous General Expenses - Account 930.2	307		
23	Schedule XX - Organization Chart	401		
24	Schedule XXI - Methods of Allocation	402		

Name of Respondent Xcel Energy Services Inc.		This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission		Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
Schedule I - Comparative Balance Sheet					
1. Give balance sheet of the Company as of December 31 of the current and prior year.					
Line No.	Account Number (a)	Description (b)	Reference Page No. (c)	As of Dec 31 Current (d)	As of Dec 31 Prior (e)
1		Service Company Property			
2	101	Service Company Property	103		
3	101.1	Property Under Capital Leases	103		
4	106	Completed Construction Not Classified			
5	107	Construction Work In Progress	103		
6		Total Property (Total Of Lines 2-5)			
7	108	Less: Accumulated Provision for Depreciation of Service Company Property	104		
8	111	Less: Accumulated Provision for Amortization of Service Company Property			
9		Net Service Company Property (Total of Lines 6-8)			
10		Investments			
11	123	Investment In Associate Companies	105		
12	124	Other Investments	105	58,846,927	52,458,124
13	128	Other Special Funds	105		
14		Total Investments (Total of Lines 11-13)		58,846,927	52,458,124
15		Current And Accrued Assets			
16	131	Cash			
17	134	Other Special Deposits			
18	135	Working Funds			
19	136	Temporary Cash Investments		2,432,621	783,617
20	141	Notes Receivable			
21	142	Customer Accounts Receivable			
22	143	Accounts Receivable		4,010,102	4,378,617
23	144	Less: Accumulated Provision for Uncollectible Accounts			
24	146	Accounts Receivable From Associate Companies	106	126,469,284	162,568,086
25	152	Fuel Stock Expenses Undistributed	107		
26	154	Materials And Supplies			
27	163	Stores Expense Undistributed	108		
28	165	Prepayments		75,406,515	65,903,870
29	171	Interest And Dividends Receivable		97,268	
30	172	Rents Receivable			
31	173	Accrued Revenues			
32	174	Miscellaneous Current and Accrued Assets			
33	175	Derivative Instrument Assets	109		
34	176	Derivative Instrument Assets – Hedges			
35		Total Current and Accrued Assets (Total of Lines 16-34)		208,415,790	233,634,190
36		Deferred Debits			
37	181	Unamortized Debt Expense			
38	182.3	Other Regulatory Assets			
39	183	Preliminary Survey And Investigation Charges			
40	184	Clearing Accounts			
41	185	Temporary Facilities			
42	186	Miscellaneous Deferred Debits		226,041,779	236,892,085
43	188	Research, Development, or Demonstration Expenditures	110		
44	189	Unamortized loss on reacquired debt	111		
45	190	Accumulated Deferred Income Taxes		49,641,056	46,059,841
46		Total Deferred Debits (Total of Lines 37-45)		275,682,835	282,951,926
47		TOTAL ASSETS AND OTHER DEBITS (TOTAL OF LINES 9, 14, 35 and 46)		542,945,552	569,044,240

Name of Respondent Xcel Energy Services Inc.		This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission		Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
Schedule I - Comparative Balance Sheet (continued)					
Line No.	Account Number (a)	Description (b)	Reference Page No. (c)	As of Dec 31 Current (d)	As of Dec 31 Prior (e)
48		Proprietary Capital			
49	201	Common Stock Issued	201	10	10
50	204	Preferred Stock Issued	201		
51	211	Miscellaneous Paid-In-Capital	201	(309,953)	(309,475)
52	215	Appropriated Retained Earnings	201		
53	216	Unappropriated Retained Earnings	201	2,680,063	(1)
54	219	Accumulated Other Comprehensive Income	201	(12,846,996)	(12,465,627)
55		Total Proprietary Capital (Total of Lines 49-54)		(10,476,876)	(12,775,093)
56		Long-Term Debt			
57	223	Advances From Associate Companies	202		
58	224	Other Long-Term Debt	202		
59	225	Unamortized Premium on Long-Term Debt			
60	226	Less: Unamortized Discount on Long-Term Debt-Debit			
61		Total Long-Term Debt (Total of Lines 57-60)			
62		Other Non-current Liabilities			
63	227	Obligations Under Capital Leases-Non-current			
64	228.2	Accumulated Provision for Injuries and Damages			
65	228.3	Accumulated Provision For Pensions and Benefits		181,887,055	191,440,214
66	230	Asset Retirement Obligations			
67		Total Other Non-current Liabilities (Total of Lines 63-66)		181,887,055	191,440,214
68		Current and Accrued Liabilities			
69	231	Notes Payable			
70	232	Accounts Payable		156,260,710	179,090,485
71	233	Notes Payable to Associate Companies	203	94,700,000	93,700,000
72	234	Accounts Payable to Associate Companies	203		
73	236	Taxes Accrued		20,490,682	24,526,997
74	237	Interest Accrued		53,659	
75	241	Tax Collections Payable		2,905,742	2,926,853
76	242	Miscellaneous Current and Accrued Liabilities	203	5,015,000	4,138,000
77	243	Obligations Under Capital Leases – Current			
78	244	Derivative Instrument Liabilities			
79	245	Derivative Instrument Liabilities – Hedges			
80		Total Current and Accrued Liabilities (Total of Lines 69-79)		279,425,793	304,382,335
81		Deferred Credits			
82	253	Other Deferred Credits		70,753,194	63,933,736
83	254	Other Regulatory Liabilities			
84	255	Accumulated Deferred Investment Tax Credits			
85	257	Unamortized Gain on Reacquired Debt			
86	282	Accumulated deferred income taxes-Other property		1,843,292	1,445,517
87	283	Accumulated deferred income taxes-Other		19,513,094	20,617,531
88		Total Deferred Credits (Total of Lines 82-87)		92,109,580	85,996,784
89		TOTAL LIABILITIES AND PROPRIETARY CAPITAL (TOTAL OF LINES 55, 61, 67, 80, AND 88)		542,945,552	569,044,240

Name of Respondent Xcel Energy Services Inc.	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
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Schedule II - Service Company Property

1. Provide an explanation of Other Changes recorded in Column (f) considered material in a footnote.
2. Describe each construction work in progress on lines 18 through 30 in Column (b).

Line No.	Acct # (a)	Title of Account (b)	Balance at Beginning of Year (c)	Additions (d)	Retirements or Sales (e)	Other Changes (f)	Balance at End of Year (g)
1	301	Organization					
2	303	Miscellaneous Intangible Plant					
3	306	Leasehold Improvements					
4	389	Land and Land Rights					
5	390	Structures and Improvements					
6	391	Office Furniture and Equipment					
7	392	Transportation Equipment					
8	393	Stores equipment					
9	394	Tools, Shop and Garage Equipment					
10	395	Laboratory Equipment					
11	396	Power Operated Equipment					
12	397	Communications Equipment					
13	398	Miscellaneous Equipment					
14	399	Other Tangible Property					
15	399.1	Asset Retirement Costs					
16		Total Service Company Property (Total of Lines 1-15)					
17	107	Construction Work in Progress:					
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31		Total Account 107 (Total of Lines 18-30)					
32		Total (Lines 16 and Line 31)					

Name of Respondent Xcel Energy Services Inc.	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
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Schedule IV – Investments

1. For other investments (Account 124) and other special funds (Account 128), in a footnote state each investment separately, with description including the name of issuing company, number of shares held or principal investment amount.
2. For temporary cash investments (Account 136), list each investment separately in a footnote.
3. Investments less than \$50,000 may be grouped, showing the number of items in each group.

Line No.	Account Number (a)	Title of Account (b)	Balance at Beginning of Year (c)	Balance at Close of Year (d)
1	123	Investment In Associate Companies		
2	124	Other Investments	52,458,124	58,846,928
3	128	Other Special Funds		
4	136	Temporary Cash Investments	783,617	2,432,621
5		(Total of Lines 1-4)	53,241,741	61,279,549

Name of Respondent Xcel Energy Services Inc.	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year of Report 2018
FOOTNOTE DATA			

Schedule Page: 105 Line No.: 2 Column: d

FERC Account 124-Other Investments:

Funding vehicles for key man insurance and deferred compensation obligations.						
2018	Pacific Life Insurance Co.	Security Life Insurance	Prudential Insurance Co.	Rabbi Trust	Hartford Insurance Co.	Total
Officer Survivor Benefit (OSB) Cash Surrender Value (CSV)					530,560	\$530,560
Premiums	210,200	48,569	90,913			\$349,682
CSV	10,780,614	460,129	903,939	50,567,552		\$62,712,234
Loans	(4,432,682)	(312,867)				(\$4,745,549)
Total	\$6,558,132	\$195,831	\$994,852	\$50,567,552	\$530,560	\$58,846,927

Schedule Page: 105 Line No.: 4 Column: d

FERC Account 136-Temporary Cash Investments:

The full amount represents December 31, 2018 excess cash balance which was held in a temporary cash investment.

Name of Respondent Xcel Energy Services Inc.		This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
Schedule V – Accounts Receivable from Associate Companies				
<p>1. List the accounts receivable from each associate company. 2. If the service company has provided accommodation or convenience payments for associate companies, provide in a separate footnote a listing of total payments for each associate company.</p>				
Line No.	Account Number (a)	Title of Account (b)	Balance at Beginning of Year (c)	Balance at Close of Year (d)
1	146	Accounts Receivable From Associate Companies		
2		Associate Company:		
3		Northern States Power Company, a Minnesota corporation (NSP-Minnesota)	71,367,900	52,743,959
4		Public Service Company of Colorado, a Colorado corporation (PSCo)	58,835,751	45,830,128
5		Southwestern Public Service Company, a New Mexico corporation (SPS)	22,298,269	19,178,589
6		Northern States Power Company, a Wisconsin corporation (NSP-Wisconsin)	11,728,758	9,017,756
7		e-prime, Inc.	24,536	117,257
8		Nicollet Projects I, LLC	(867,394)	82,660
9		Capital Services, LLC	121,230	57,508
10		Eloigne Company	33,651	41,491
11		Xcel Energy WYCO, Inc.	271,037	41,014
12		Quixx Corporation	367	31,258
13		Xcel Energy Ventures, Inc.	14,470	8,453
14		WestGas Interstate, Inc.	1,607	6,022
15		Chippewa and Flambeau Improvement Company	4,527	5,367
16		1480 Welton, Inc.	(187)	4,311
17		Xcel Energy Performance Contracting, Inc.	467	3,896
18		Xcel Energy Wholesale Group, Inc.	6,753	3,660
19		Seren Innovations, Inc.	3,176	2,938
20		Energy Impact Fund Investments, Inc.	672	2,687
21		PSR Investments, Inc.	2,816	2,491
22		Clearwater Investments, Inc.	1,057	2,141
23		Xcel Energy Transmission Development Company, LLC	2,702	1,395
24		Xcel Energy Transmission Holding Company, LLC	4,853	1,299
25		Xcel Energy Ventures Holdings, Inc.	7,863	1,098
26		Xcel Energy Retail Holdings, Inc.	1,493	1,040
27		Xcel Energy Southwest Transmission Company, LLC	(55)	830
28		Xcel Energy Markets Holdings, Inc.	958	810
29		Xcel Energy West Transmission Company, LLC	773	744
30		Xcel Energy International, Inc.	849	731
31		Xcel Energy Communications Group, Inc.	1,162	724
32		Nicollet Holdings Company	624	718
33		Reddy Kilowatt Corporation	602	322
34		Quixxlin Corporation		300
35		NSP Lands, Inc.	84	263
36		United Power & Land Company	380	138
37		Xcel Energy, Inc.	(1,303,665)	(724,714)
38				0
39				
40	Total		162,568,086	126,469,284

Name of Respondent	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year of Report 2018
FOOTNOTE DATA			

Schedule Page: 106 Line No.: 37 Column: d

Xcel Energy Inc.:

This credit balance represents unsettled payments for the 401(k) and restricted stock units. The offsetting equity account for these items are recorded on Xcel Energy Inc. (the Holding Company). The Service Company debits an expense account and credits an intercompany A/R with the Holding Company. The corresponding entry on the Holding Company is a debit to an intercompany A/R with the Service Company and a credit to an equity account.

Schedule Page: 106 Line No.: 38 Column: d

2018 CONVENIENCE PAYMENTS

PSCo	\$116,272,627
NSP-Minnesota	93,539,521
SPS	32,286,719
NSP-Wisconsin	15,440,423
Xcel Energy, Inc.	4,443,124
e-prime, Inc.	794,242
Nicollet Projects I, LLC	337,780
Xcel Energy Transmission Development Company	177,857
Quixx Corporation	50,799
Capital Services, LLC	13,245
Chippewa and Flambeau improvement Company	7,866
Xcel Energy Performance Contracting, Inc.	5,797
Xcel Energy Ventures Holdings	360
Seren Innovations, Inc.	285
NSP Lands, Inc.	24
	\$263,370,669

Name of Respondent Xcel Energy Services Inc.	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
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Schedule VI – Fuel Stock Expenses Undistributed

- List the amount of labor in Column (c) and expenses in Column (d) incurred with respect to fuel stock expenses during the year and indicate amount attributable to each associate company.
- In a separate footnote, describe in a narrative the fuel functions performed by the service company.

Line No.	Account Number (a)	Title of Account (b)	Labor (c)	Expenses (d)	Total (e)
1	152	Fuel Stock Expenses Undistributed			
2		Associate Company:			
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
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26					
27					
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31					
32					
33					
34					
35					
36					
37					
38					
39					
40	Total				

Name of Respondent Xcel Energy Services Inc.	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
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Schedule VII – Stores Expense Undistributed

1. List the amount of labor in Column (c) and expenses in Column (d) incurred with respect to stores expense during the year and indicate amount attributable to each associate company.

Line No.	Account Number (a)	Title of Account (b)	Labor (c)	Expenses (d)	Total (e)
1	163	Stores Expense Undistributed			
2		Associate Company:			
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
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25					
26					
27					
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32					
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34					
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36					
37					
38					
39					
40	Total				

Name of Respondent Xcel Energy Services Inc.	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
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Schedule VIII - Miscellaneous Current and Accrued Assets

1. Provide detail of items in this account. Items less than \$50,000 may be grouped, showing the number of items in each group.

Line No.	Account Number (a)	Title of Account (b)	Balance at Beginning of Year (c)	Balance at Close of Year (d)
1	174	Miscellaneous Current and Accrued Assets		
2		Item List:		
3				
4				
5				
6				
7				
8				
9				
10				
11				
12				
13				
14				
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16				
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26				
27				
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32				
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34				
35				
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37				
38				
39				
40	Total			

Name of Respondent Xcel Energy Services Inc.	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
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Schedule IX - Miscellaneous Deferred Debits

1. Provide detail of items in this account. Items less than \$50,000 may be grouped, showing the number of items in each group.

Line No.	Account Number (a)	Title of Account (b)	Balance at Beginning of Year (c)	Balance at Close of Year (d)
1	186	Miscellaneous Deferred Debits		
2		Items List:		
3		Post Retirement Benefits	235,292,085	224,441,779
4		Life Insurance Premium	1,600,000	1,600,000
5		Other Miscellaneous Deferred Debits		
6				
7				
8				
9				
10				
11				
12				
13				
14				
15				
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40	Total		236,892,085	226,041,779

Name of Respondent Xcel Energy Services Inc.	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
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Schedule X - Research, Development, or Demonstration Expenditures

1. Describe each material research, development, or demonstration project that incurred costs by the service corporation during the year. Items less than \$50,000 may be grouped, showing the number of items in each group.

Line No.	Account Number (a)	Title of Account (b)	Amount (c)
1	188	Research, Development, or Demonstration Expenditures	
2		Project List:	
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
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34			
35			
36			
37			
38			
39			
40	Total		

Name of Respondent Xcel Energy Services Inc.	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
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Schedule XI - Proprietary Capital

1. For miscellaneous paid-in capital (Account 211) and appropriate retained earnings (Account 215), classify amounts in each account, with a brief explanation, disclosing the general nature of transactions which give rise to the reported amounts.
2. For the unappropriated retained earnings (Account 216), in a footnote, give particulars concerning net income or (loss) during the year, distinguishing between compensation for the use of capital owed or net loss remaining from servicing nonassociates per the General Instructions of the Uniform System of Accounts. For dividends paid during the year in cash or otherwise, provide rate percentages, amount of dividend, date declared and date paid.

Line No.	Account Number (a)	Title of Account (b)	Description (c)	Amount (d)
1	201	Common Stock Issued	Number of Shares Authorized	1,000
2			Par or Stated Value per Share	0.01
3			Outstanding Number of Shares	1,000
4			Close of Period Amount	10
5		Preferred Stock Issued	Number of Shares Authorized	
6			Par or Stated Value per Share	
7			Outstanding Number of Shares	
8			Close of Period Amount	
9	211	Miscellaneous Paid-In Capital		(309,953)
10	215	Appropriated Retained Earnings		
11	219	Accumulated Other Comprehensive Income		(12,846,996)
12	216	Unappropriated Retained Earnings	Balance at Beginning of Year	2,680,063
13			Net Income or (Loss)	
14			Dividend Paid	
15			Balance at Close of Year	2,680,063

Name of Respondent Xcel Energy Services Inc.	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
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Schedule XII – Long Term Debt

- For the advances from associate companies (Account 223), describe in a footnote the advances on notes and advances on open accounts. Names of associate companies from which advances were received shall be shown under the class and series of obligation in Column (c).
- For the deductions in Column (h), please give an explanation in a footnote.
- For other long-term debt (Account 224), list the name of the creditor company or organization in Column (b).

Line No.	Account Number (a)	Title of Account (b)	Term of Obligation Class & Series of Obligation (c)	Date of Maturity (d)	Interest Rate (e)	Amount Authorized (f)	Balance at Beginning of Year (g)	Additions Deductions (h)	Balance at Close of Year (i)
1	223	Advances from Associate Companies							
2		Associate Company:							
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13		TOTAL							
14	224	Other Long-Term Debt							
15		List Creditor:							
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28		TOTAL							

Name of Respondent Xcel Energy Services Inc.		This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
Schedule XIII – Current and Accrued Liabilities				
<p>1. Provide the balance of notes and accounts payable to each associate company (Accounts 233 and 234). 2. Give description and amount of miscellaneous current and accrued liabilities (Account 242). Items less than \$50,000 may be grouped, showing the number of items in each group.</p>				
Line No.	Account Number (a)	Title of Account (b)	Balance at Beginning of Year (c)	Balance at Close of Year (d)
1	233	Notes Payable to Associates Companies	93,700,000	94,700,000
2				
3				
4				
5				
6				
7				
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9				
10				
11				
12				
13				
14				
15				
16				
17				
18				
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20				
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22				
23				
24	234	Accounts Payable to Associate Companies		
25				
26				
27				
28				
29				
30				
31				
32				
33				
34				
35				
36				
37				
38				
39				
40				
41	242	Miscellaneous Current and Accrued Liabilities	4,138,000	5,015,000
42				
43				
44				
45				
46				
47				
48				
49				
50		(Total)	97,838,000	99,715,000

Name of Respondent Xcel Energy Services Inc.	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year of Report 2018
FOOTNOTE DATA			

Schedule Page: 203 Line No.: 1 Column: d

FERC Account 233-Notes Payable to Associate Companies

The 2018 balance represents intercompany borrowings with Xcel Energy, Inc.

Schedule Page: 203 Line No.: 41 Column: d

FERC Account 242-Miscellaneous Current and Accrued Liabilities

The 2018 balance represents the current benefit obligation for a non-qualified pension plan and retiree medical.

Non-qualified pension plan	\$4,048,000
Retiree Medical	967,000
Total	<u>\$5,015,000</u>

Name of Respondent Xcel Energy Services Inc.	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year of Report 2018
Schedule XIV- Notes to Financial Statements			

1. Use the space below for important notes regarding the financial statements or any account thereof.
2. Furnish particulars as to any significant contingent assets or liabilities existing at the end of the year.
3. Furnish particulars as to any significant increase in services rendered or expenses incurred during the year.
4. Furnish particulars as to any amounts recorded in Account 434, Extraordinary Income, or Account 435, Extraordinary Deductions.
5. Notes relating to financial statements shown elsewhere in this report may be indicated here by reference.
6. Describe the annual statement supplied to each associate service company in support of the amount of interest on borrowed capital and compensation for use of capital billed during the calendar year. State the basis for billing of interest to each associate company. If a ratio, describe in detail how ratio is computed. If more than one ratio explain the calculation. Report the amount of interest borrowed and/or compensation for use of capital billed to each associate company.

ANNUAL REPORT OF XCEL ENERGY SERVICES INC.

For the Years Ended December 31, 2018 and 2017

Schedule XIV - NOTES TO FINANCIAL STATEMENTS

1. Summary of Significant Accounting Policies

Business and System of Accounts — Xcel Energy Services Inc. (XES or the Company) is a wholly owned subsidiary of Xcel Energy Inc. (Xcel Energy). XES provides Northern States Power Company, a Minnesota corporation (NSP-Minnesota), Northern States Power Company, a Wisconsin corporation (NSP-Wisconsin), Public Service Company of Colorado (PSCo) and Southwestern Public Service Company (SPS) and other subsidiaries of Xcel Energy with a variety of administrative, management, engineering, construction and corporate support services at cost. XES began operations effective April 2, 1997 doing business as New Century Energy. All of XES' accounting records conform to the Federal Energy Regulatory Commission (FERC) uniform system of accounts or to systems required by various state regulatory commissions, which are the same in all material respects.

Basis of Accounting — The accompanying financial statements were prepared in accordance with the accounting requirements of the FERC as set forth in the Uniform System of Accounts and published accounting releases, which is a comprehensive basis of accounting other than Generally Accepted Accounting Principles (GAAP). The following areas represent the significant differences between the Uniform System of Accounts and GAAP:

- Accumulated deferred income taxes are shown as long-term assets and liabilities at their gross amounts in the FERC presentation, in contrast to the GAAP presentation as net long-term assets and liabilities.
- Unrecognized tax benefits are recorded for temporary differences in accounts established for accumulated deferred income taxes in the FERC presentation, in contrast to the GAAP presentation as taxes accrued and noncurrent other liabilities.
- Various expenses such as donations, lobbying, and other non-regulatory expenses are presented as other income and deductions for the FERC presentation and reported as operating expenses for the GAAP presentation.
- Income tax expense is shown as a component of operating expenses in the FERC presentation, in contrast to the GAAP presentation as a below-the-line deduction from operating income.

Subsequent Events — Management has evaluated the impact of events occurring after Dec. 31, 2018 up to Feb. 22, 2019, the date Xcel Energy's GAAP financial statements were issued and has updated such evaluation for disclosure purposes through the date of filing this report. These statements contain all necessary adjustments and disclosures resulting from these evaluations.

Use of Estimates — In recording transactions and balances resulting from business operations, XES uses estimates based on the best information available. The recorded estimates are revised when better information becomes available or when actual amounts can be determined. Those revisions can affect operating results.

Benefit Plans and Other Postretirement Benefits — Xcel Energy maintains pension and postretirement benefit plans for eligible employees. Recognizing the cost of providing benefits and measuring the projected benefit obligation of these plans under applicable accounting guidance requires management to make various assumptions and estimates.

Based on the regulatory recovery mechanisms of Xcel Energy's utility subsidiaries, certain unrecognized actuarial gains and losses and unrecognized prior service costs or credits are recorded as regulatory assets and liabilities, rather than other comprehensive income.

Name of Respondent Xcel Energy Services Inc.	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year of Report 2018
Schedule XIV- Notes to Financial Statements			

Leases — XES evaluates a variety of contracts for lease classification at inception, including rental arrangements for office space, vehicles and equipment. Contracts determined to contain a lease because of per unit pricing that is other than fixed or market price, terms regarding the use of a particular asset, and other factors are evaluated further to determine if the arrangement is a capital lease.

Income Taxes — The Company's operations are included in the consolidated federal income tax return of Xcel Energy. The allocation of income tax consequences to the Company is calculated under a parent company policy which provides that benefits or liabilities created by the Company, computed on a separate return basis, will be allocated to (and paid to or by) the Company to the extent the benefits are usable or additional liabilities are incurred in Xcel Energy's consolidated tax returns. Deferred taxes are provided on temporary differences between the financial accounting and tax bases of assets and liabilities using the tax rates that are in effect at the balance sheet date (see Note 6).

Cash and Cash Equivalents — XES considers investments in certain instruments with a remaining maturity of three months or less at the time of purchase, to be cash equivalents.

Accounts Receivable — Accounts receivable are stated at the actual billed amount.

2. Common Stock

XES has authorized the issuance of common stock.

Common Shares	Par Value
<u>Authorized</u>	<u>Par Value</u>
1,000	\$ 0.01

At Dec. 31, 2018 and 2017, all shares of common stock were issued and held by Xcel Energy.

3. Borrowings and Other Financing Instruments

Money Pool — Xcel Energy has established a utility money pool arrangement with NSP-Minnesota, PSCo, and SPS. The utility money pool, administered by XES, allows for short-term investments in and borrowings between the participating utility subsidiaries. Xcel Energy may make investments in the participating utility subsidiaries at market-based interest rates; however, the money pool arrangement does not allow the participating utility subsidiaries to make investments in Xcel Energy.

The Board of Directors has authorized the Company to borrow directly from Xcel Energy. At Dec. 31, intercompany borrowings outstanding and the weighted average interest rate were as follows:

<u>(Amounts in Thousands of Dollars, Except Interest Rates)</u>	<u>Twelve Months Ended Dec. 31, 2018</u>	<u>Twelve Months Ended Dec. 31, 2017</u>
Borrowing limit.....	\$ 300,000	\$ 300,000
Intercompany borrowings outstanding at period end.....	94,700	93,700
Average amount outstanding.....	144,495	153,632
Maximum amount outstanding.....	252,500	255,400
Weighted average interest rate, computed on a daily basis.....	2.46 %	1.38 %
Weighted average interest rate at period end.....	2.97	1.80

4. Commitments and Contingencies

Leases — XES leases a variety of equipment and facilities used in the normal course of business. Total expenses under operating lease obligations for XES were approximately \$23 million and \$21 million in 2018 and 2017, respectively.

Future commitments under operating leases are as follows:

Name of Respondent Xcel Energy Services Inc.	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year of Report 2018
Schedule XIV- Notes to Financial Statements			

(Thousands of Dollars)	Total Operating Leases
2019	\$ 22,949
2020	22,765
2021	22,563
2022	22,054
2023	21,566
Thereafter	124,130

Technology Agreements — XES has a contract that extends through December 2022 with International Business Machines Corp. (IBM) for information technology services. The contract is cancelable at the XES' option, although XES would be obligated to pay 50 percent of the contract value for early termination. XES capitalized or expensed \$81 million, \$98 million and \$119 million associated with the IBM contract in 2018, 2017 and 2016, respectively.

XES' contract with Accenture for information technology services extends through December 2020. The contract is cancelable at XES' option, although there are financial penalties for early termination. XES capitalized or expensed \$46 million, \$16 million and \$35 million associated with the Accenture contract in 2018, 2017 and 2016, respectively.

Committed minimum payments under these obligations are as follows:

(Millions of Dollars)	IBM Agreement	Accenture Agreement
2019	\$ 30	\$ 11
2020	16	11
2021	16	-
2022	7	-
2023	-	-
Thereafter	-	-

5. Benefit Plans and Other Postretirement Benefits

Pension and other postretirement disclosures below represent Xcel Energy consolidated information unless specifically identified as being attributable to XES. Consistent with the process for rate recovery of pension and postretirement benefits for its employees, XES accounts for its participation in, and related costs of, pension and other postretirement benefit plans sponsored by Xcel Energy as multiple employer plans. XES is responsible for its share of cash contributions, plan costs and obligations and is entitled to its share of plan assets; accordingly, XES accounts for its pro rata share of these plans, including pension expenses and contributions, resulting in accounting consistent with that of a single employer plan exclusively for XES employees.

The plans invest in various instruments which are disclosed under the accounting guidance for fair value measurements which establishes a hierarchical framework for disclosing the observability of the inputs utilized in measuring fair value. The three levels in the hierarchy and examples of each level are as follows:

Level 1 — Quoted prices are available in active markets for identical assets as of the reporting date. The types of assets included in Level 1 are highly liquid and actively traded instruments with quoted prices.

Level 2 — Pricing inputs are other than quoted prices in active markets, but are either directly or indirectly observable as of the reporting date. The types of assets included in Level 2 are typically either comparable to actively traded securities or contracts, or priced with models using highly observable inputs.

Name of Respondent	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year of Report 2018
Schedule XIV- Notes to Financial Statements			

Level 3 — Significant inputs to pricing have little or no observability as of the reporting date. The types of assets included in Level 3 are those with inputs requiring significant management judgment or estimation.

Pension Benefits

Xcel Energy, which includes XES, has several noncontributory, defined benefit pension plans that cover almost all employees. Generally, benefits are based on a combination of years of service, the employee’s average pay and, in some cases, social security benefits. Xcel Energy and XES’ policy is to fully fund into an external trust the actuarially determined pension costs recognized for ratemaking and financial reporting purposes, subject to the limitations of applicable employee benefit and tax laws.

In addition to the qualified pension plans, Xcel Energy maintains a supplemental executive retirement plan (SERP) and a nonqualified pension plan. The SERP is maintained for certain executives that were participants in the plan in 2008, when the SERP was closed to new participants. The nonqualified pension plan provides unfunded, nonqualified benefits for compensation that is in excess of the limits applicable to the qualified pension plans. The total obligations of the SERP and nonqualified plan as of Dec. 31, 2018 and 2017 for XES were \$23.1 million and \$24.9 million, respectively. In 2018 and 2017, XES recognized net benefit cost for financial reporting for the SERP and nonqualified plans of \$2.8million and \$3.7 million, respectively. Benefits for these unfunded plans are paid out of Xcel Energy’s consolidated operating cash flows.

In 2016, Xcel Energy established rabbi trusts to provide partial funding for future distributions of the SERP and its deferred compensation plan, supplemented by Xcel Energy’s consolidated operating cash flows as determined necessary. Also in 2016, Xcel Energy amended the deferred compensation plan to provide eligible participants the ability to diversify deferred settlements of equity awards, other than time-based equity awards, into various fund options.

Xcel Energy and XES base their investment-return assumption on expected long-term performance for each of the investment types included in its pension asset portfolio. Xcel Energy and XES consider the historical returns achieved by its asset portfolio over the past 20-year or longer period, as well as the long-term return levels projected and recommended by investment experts. Investment returns were below the assumed levels of 6.87 percent in 2018 and above the assumed levels of 6.87 percent in 2017. Xcel Energy and XES continually review their pension assumptions. In 2019, Xcel Energy and XES will use an investment return assumption of 6.87 percent. The pension cost determination assumes a forecasted mix of investment types over the long-term.

The assets are invested in a portfolio according to Xcel Energy and XES’ return, liquidity and diversification objectives to provide a source of funding for plan obligations and minimize the necessity of contributions to the plan, within appropriate levels of risk. The principal mechanism for achieving these objectives is the projected allocation of assets to selected asset classes, given the long-term risk, return, and liquidity characteristics of each particular asset class. There were no significant concentrations of risk in any particular industry, index, or entity. Market volatility can impact even well-diversified portfolios and significantly affect the return levels achieved by pension assets in any year.

The following table presents the target pension asset allocations for Xcel Energy at Dec. 31 for the upcoming year:

	2018	2017
Domestic and international equity securities.....	36 %	36 %
Long-duration fixed income and interest rate swap securities.....	30	27
Short-to-intermediate fixed income securities.....	17	20
Alternative investments.....	15	15
Cash.....	2	2
Total.....	100 %	100 %

The ongoing investment strategy is based on plan-specific investment recommendations that seek to minimize potential investment and interest rate risk as a plan’s funded status increases over time. The investment recommendations result in a greater percentage of long-duration fixed income securities being allocated to specific plans having relatively higher funded status ratios and a greater percentage of growth assets being allocated to plans having relatively lower funded status ratios. The aggregate projected asset allocation presented in the table above for the master pension trust results from the plan-specific strategies.

Name of Respondent Xcel Energy Services Inc.	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year of Report 2018
Schedule XIV- Notes to Financial Statements			

Pension Plan Assets

The following tables present, for each of the fair value hierarchy levels, Xcel Energy's pension plan assets that are measured at fair value as of Dec. 31, 2018 and 2017:

Dec. 31, 2018					
(Millions of Dollars)	Level 1	Level 2	Level 3	Investments Measured at NAV	Total
Cash equivalents	\$ 137	\$ -	\$ -	\$ -	\$ 137
Commingled funds	914	-	-	987	1,901
Debt securities	-	621	-	-	621
Equity securities	106	-	-	-	106
Other	2	5	-	(30)	(23)
Total	<u>\$ 1,159</u>	<u>\$ 626</u>	<u>\$ -</u>	<u>\$ 957</u>	<u>\$ 2,742</u>

Dec. 31, 2017					
(Millions of Dollars)	Level 1	Level 2	Level 3	Investments Measured at NAV	Total
Cash equivalents	\$ 196	\$ -	\$ -	\$ -	\$ 196
Commingled funds	1,054	-	-	1,075	2,129
Debt securities	-	673	-	-	673
Equity securities	114	-	-	-	114
Other	(29)	4	-	1	(24)
Total	<u>\$ 1,335</u>	<u>\$ 677</u>	<u>\$ -</u>	<u>\$ 1,076</u>	<u>\$ 3,088</u>

Benefit Obligations — A comparison of the actuarially computed pension benefit obligation and plan assets for Xcel Energy is presented in the following table:

Name of Respondent Xcel Energy Services Inc.	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year of Report 2018
Schedule XIV- Notes to Financial Statements			

(Thousands of Dollars)	2018	2017
Accumulated Benefit Obligation at Dec. 31	\$ 3,275,061	\$ 3,612,354
Change in Projected Benefit Obligation:		
Obligation at Jan. 1	\$ 3,827,650	\$ 3,681,618
Service cost	94,357	94,189
Interest cost	133,388	146,809
Plan amendments	-	(12,543)
Actuarial loss (gain)	(226,634)	258,613
Benefit Payments ^(a)	(354,358)	(341,036)
Obligation at Dec. 31	<u>\$ 3,474,403</u>	<u>\$ 3,827,650</u>

(Thousands of Dollars)	2018	2017
Change in Fair Value of Plan Assets:		
Fair value of plan assets at Jan. 1	\$ 3,087,959	\$ 2,855,813
Actual return (loss) on plan assets	(141,329)	411,628
Employer contributions	150,000	161,554
Benefit payments	(354,358)	(341,036)
Fair value of plan assets at Dec. 31	<u>\$ 2,742,272</u>	<u>\$ 3,087,959</u>

Funded Status of Plans at Dec. 31:		
Funded status ^(b)	\$ (732,131)	\$ (739,691)

^(a) Amount includes approximately \$198 million in 2018 and \$174 million in 2017 of lump-sum benefit payments used in the determination of a settlement charge.

^(b) Amounts are recognized in noncurrent liabilities on Xcel Energy's consolidated balance sheets.

(Thousands of Dollars)	2018	2017
XES Amounts Not Yet Recognized as Components of Net Periodic Benefit Cost:		
Net loss	\$ 232,026	\$ 239,618
Prior service cost	(10,292)	(11,277)
Total	<u>\$ 221,734</u>	<u>\$ 228,341</u>

(Thousands of Dollars)	2018	2017
XES Amounts Not Yet Recognized as Components of Net Periodic Benefit Cost Have Been Recorded as Follows Based Upon Expected Recovery in Rates:		
Miscellaneous deferred debits	\$ 212,183	\$ 218,116
Accumulated deferred income taxes	2,469	2,652
Net-of-tax accumulated other comprehensive income	7,082	7,573
Total	<u>\$ 221,734</u>	<u>\$ 228,341</u>

XES accumulated provision for pensions and benefits	\$ 136,997	\$ 140,602
Measurement date	Dec. 31, 2018	Dec. 31, 2017

Significant Assumptions Used to Measure Benefit Obligations:	2018	2017
Discount rate for year-end valuation	4.31 %	3.63 %
Expected average long-term increase in compensation level	3.75	3.75
Mortality table	RP-2014	RP-2014

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Schedule XIV- Notes to Financial Statements			

Mortality — In 2014, the Society of Actuaries published a new mortality table (RP-2014) and projection scale (MP-2014) that increased the overall life expectancy of males and females. In 2014, Xcel Energy adopted this mortality table, with modifications, based on its population and specific experience. During 2017, a new projection table was released (MP-2017). Xcel Energy evaluated the updated projection table and concluded that the methodology currently in use and adopted in 2016 is consistent with the recently updated 2017 table and continues to be representative of Xcel Energy’s population.

Cash Flows — Cash funding requirements can be impacted by changes to actuarial assumptions, actual asset levels and other calculations prescribed by the funding requirements of income tax and other pension-related regulations. Required contributions were made in 2016 through 2019 to meet minimum funding requirements. Total voluntary and required pension funding contributions across all four of Xcel Energy’s pension plans were as follows:

- \$150 million in January 2019;
- \$150 million in 2018;
- \$162 million in 2017; and
- \$125 million in 2016.

For future years, Xcel Energy anticipates contributions will be made as necessary.

Plan Amendments — Xcel Energy amended the Xcel Energy Pension Plan and Xcel Energy Inc. Nonbargaining Pension Plan (South) in 2017 to reduce supplemental benefits for non-bargaining participants as well as to allow the transfer of a portion of nonqualified pension obligations into the qualified plans.

In 2018 and 2017, there were no plan amendments made which affected the projected benefit obligation.

Benefit Costs — The components of Xcel Energy’s net periodic pension cost were:

(Thousands of Dollars)	2018	2017
Service cost	\$ 94,357	\$ 94,189
Interest cost	133,388	146,809
Expected return on plan assets	(208,762)	(209,270)
Amortization of prior service credit	(4,643)	(1,768)
Amortization of net loss	110,798	106,681
Settlement charge	90,705	81,136
Net periodic pension cost	215,843	217,777
Costs not recognized due to effects of regulation	(75,486)	(78,722)
Net benefit cost recognized for financial reporting	<u>\$ 140,357</u>	<u>\$ 139,055</u>
XES:		
Net periodic pension cost	\$ 45,358	\$ 49,566

Significant Assumptions Used to Measure Costs:

	2018	2017
Discount rate	3.63 %	4.13 %
Expected average long-term increase in compensation level	3.75	3.75
Expected average long-term rate of return on assets	6.87	6.87

Pension costs include an expected return impact for the current year that may differ from actual investment performance in the plan. The return assumption used for 2018 pension cost calculations is 6.87 percent. The pension cost calculation uses a market-related valuation of pension assets. Xcel Energy uses a calculated value method to determine the market-related value of the plan assets. The market-related value is determined by adjusting the fair market value of assets at the beginning of the year to reflect the investment gains and losses (the difference between the actual investment return and the expected investment return on the market related value) during each of the previous five years at the rate of 20 percent per year. As these differences between the actual investment returns and the expected investment returns are incorporated into the market-related value, the differences are recognized in pension cost over the expected average remaining years of service for active employees, which was approximately 13 years in 2018.

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Defined Contribution Plans

Xcel Energy, which includes XES, maintains 401(k) and other defined contribution plans that cover substantially all employees. Total expense to these plans was approximately \$38 million in 2018 and \$37 million in 2017. XES' portion of that expense was approximately \$11 million in 2018 and \$10 million in 2017.

Postretirement Health Care Benefits

Xcel Energy, which includes XES, has a contributory health and welfare benefit plan that provides health care and death benefits to certain retirees.

Plan Assets — Certain state agencies that regulate Xcel Energy's utility subsidiaries also have issued guidelines related to the funding of postretirement benefit costs. These assets are invested in a manner consistent with the investment strategy for the pension plan.

The following table presents the target postretirement asset allocations for Xcel Energy at Dec. 31 for the upcoming year:

	<u>2018</u>	<u>2017</u>
Domestic and international equity securities	18 %	24 %
Short-to-intermediate fixed income securities	70	60
Alternative investments	8	9
Cash	4	7
Total	<u>100 %</u>	<u>100 %</u>

Xcel Energy and XES bases its investment-return assumption for the postretirement health care fund assets on expected long-term performance for each of the investment types included in its asset portfolio. The assets are invested in a portfolio according to Xcel Energy's return, liquidity and diversification objectives to provide a source of funding for plan obligations and minimize contributions to the plan, within appropriate levels of risk. The principal mechanism for achieving these objectives is the projected asset allocation given the long-term risk, return, correlation and liquidity characteristics of each particular asset class. There were no significant concentrations of risk in any particular industry, index, or entity. Market volatility can impact even well-diversified portfolios and significantly affect the return levels achieved by postretirement health care assets in any year.

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The following tables present, for each of the fair value hierarchy levels, Xcel Energy's postretirement benefit plan assets that are measured at fair value as of Dec. 31, 2018 and 2017:

(Millions of Dollars)	Dec. 31, 2018				
	Level 1	Level 2	Level 3	Measured at NAV	Total
Cash equivalents	\$ 19	\$ -	\$ -	\$ -	\$ 19
Insurance contracts	-	45	-	-	45
Commingled funds	133	-	-	40	173
Debt securities	-	179	-	-	179
Equity securities	-	-	-	-	-
Other	-	1	-	-	1
Total	<u>\$ 152</u>	<u>\$ 225</u>	<u>\$ -</u>	<u>\$ 40</u>	<u>\$ 417</u>

(Millions of Dollars)	Dec. 31, 2017				
	Level 1	Level 2	Level 3	Investments Measured at NAV	Total
Cash equivalents	\$ 29	\$ -	\$ -	\$ -	\$ 29
Insurance contracts	-	50	-	-	50
Commingled funds	148	-	-	-	148
Debt securities	-	198	-	-	198
Equity securities	35	-	-	-	35
Other	-	1	-	-	1
Total	<u>\$ 212</u>	<u>\$ 249</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 461</u>

There were no assets transferred in or out of Level 3 for the years ended Dec. 31, 2018 and 2017.

Benefit Obligations — A comparison of the actuarially computed benefit obligation and plan assets for Xcel Energy is presented in the following table:

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(Thousands of Dollars)	2018	2017
Change in Projected Benefit Obligation:		
Obligation at Jan. 1	\$ 620,931	\$ 603,084
Service cost	1,996	1,859
Interest cost	21,663	23,937
Medicare subsidy reimbursements	1,020	1,066
Plan participants' contributions	7,944	7,488
Actuarial loss (gain)	(6,677)	33,286
Benefit payments	(50,162)	(49,789)
Obligation at Dec. 31	<u>\$ 541,715</u>	<u>\$ 620,931</u>

(Thousands of Dollars)	2018	2017
Change in Fair Value of Plan Assets:		
Fair value of plan assets at Jan. 1	\$ 460,602	\$ 442,105
Actual return (loss) on plan assets	(12,338)	40,748
Plan participants' contributions	7,944	7,488
Employer contributions	10,932	20,050
Benefit payments	(50,162)	(49,789)
Fair value of plan assets at Dec. 31	<u>\$ 416,978</u>	<u>\$ 460,602</u>

(Thousands of Dollars)	2018	2017
Funded Status of Plans at Dec. 31:		
Funded status	<u>\$ (124,737)</u>	<u>\$ (160,329)</u>
Miscellaneous deferred debits	(6,486)	(2,509)
Accumulated provision for pensions and benefits	(118,251)	(157,820)
Net postretirement amounts recognized on balance sheet	<u>\$ (124,737)</u>	<u>\$ (160,329)</u>

(Thousands of Dollars)	2018	2017
XES Amounts Not Yet Recognized as Components of Net Periodic Benefit Cost:		
Net loss	\$ 15,402	\$ 18,828
Prior service credit	(1,606)	(2,163)
Total	<u>\$ 13,796</u>	<u>\$ 16,665</u>

(Thousands of Dollars)	2018	2017
XES Amounts Not Yet Recognized as Components of Net Periodic Benefit Cost Have Been Recorded as Follows Based Upon Expected Recovery in Rates:		
Miscellaneous deferred debits	\$ 11,476	\$ 14,140
Accumulated deferred income taxes	600	653
Net-of-tax accumulated other comprehensive income	1,720	1,872
Total	<u>\$ 13,796</u>	<u>\$ 16,665</u>

XES accumulated provision for pensions and benefits	\$ 26,387	\$ 29,807
Measurement date	Dec. 31, 2018	Dec. 31, 2017

Significant Assumptions Used to Measure Benefit Obligations:	2018	2017
Discount rate for year-end valuation	4.32 %	3.62 %
Mortality table	RP-2014	RP-2014
Health care costs trend rate - initial: Pre-65	6.50 %	7.00 %
Health care costs trend rate - initial: Post-65	5.35 %	5.50 %

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Beginning with the Dec. 31, 2018 measurement, Xcel Energy Inc. separated its initial medical trend assumption for pre-Medicare (Pre-65) and post-Medicare (Post-65) claims costs in order to reflect different short-term expectations based on recent experience differences. The Post-65 initial medical trend rate was set at 5.3 percent. The Pre-65 initial medical trend rate was set at 6.5 percent. The ultimate trend assumption remained at 4.5 percent for both groups. The period until the ultimate rate is reached is four years. Xcel Energy bases its medical trend assumption on the long-term cost inflation expected in the health care market, considering the levels projected and recommended by industry experts, as well as recent actual medical cost increases experienced by Xcel Energy's retiree medical plan.

A one-percent change in the assumed health care cost trend rate would have the following effects on Xcel Energy:

(Thousands of Dollars)	One Percentage Point	
	Increase	Decrease
Accumulated postretirement benefit obligation	\$ 49,399	\$ (42,213)
Service and interest components	2,526	(2,122)

Cash Flows — The postretirement health care plans have no funding requirements under income tax and other retirement-related regulations other than fulfilling benefit payment obligations, when claims are presented and approved under the plans. Additional cash funding requirements are prescribed by certain state and federal rate regulatory authorities. Xcel Energy, which includes XES, contributed \$11 million during 2018, \$20 million during 2017 and \$18 million during 2016 and expects to contribute approximately \$11 million during 2019.

Plan Amendments — In 2018 and 2017, there were no plan amendments made which affected the benefit obligation.

Benefit Costs — The components of Xcel Energy's net periodic postretirement benefit cost were:

(Thousands of Dollars)	2018	2017
Service cost	\$ 1,996	\$ 1,859
Interest cost	21,663	23,937
Expected return on plan assets	(25,747)	(24,622)
Amortization of prior service credit	(10,629)	(10,686)
Amortization of net loss	7,711	6,689
Net periodic postretirement benefit credit	<u>\$ (5,006)</u>	<u>\$ (2,823)</u>

XES:

Net periodic postretirement benefit cost recognized	1,527	1,491
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Significant Assumptions Used to Measure Costs:

	2018		2017
Discount rate	3.62	%	4.13
Expected average long-term rate of return on assets	5.80		5.80

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Projected Benefit Payments

The following table lists Xcel Energy's projected benefit payments for the pension and postretirement benefit plans:

(Thousands of Dollars)	Projected Pension Benefit Payments	Gross Projected Postretirement Health Care Benefit Payments	Expected Medicare Part D Subsidies	Net Projected Postretirement Health Care Benefit Payments
2019	\$ 280,528	\$ 45,493	\$ 2,062	\$ 43,431
2020	259,549	45,058	2,159	42,899
2021	258,959	44,622	2,270	42,352
2022	260,145	44,115	2,372	41,743
2023	259,345	43,245	2,465	40,780
2024-2028	1,238,409	196,553	13,451	183,102

6. Income Taxes

The components of income tax expense for the years ending Dec. 31 were as follows:

(Thousands of Dollars)	2018	2017
Current federal tax expense	\$ 9,518	\$ 11,859
Current state tax expense	3,529	3,531
Current change in unrecognized tax expense	5,341	-
Deferred federal tax benefit	(3,963)	7,171
Deferred state tax benefit	(1,122)	(1,271)
Total income tax expense	<u>\$ 13,303</u>	<u>\$ 21,290</u>

Total income tax expense from operations differs from the amount computed by applying the statutory federal income tax rate to income before income tax expense. The following reconciles such differences for the years ending Dec. 31:

	2018	2017
Federal statutory rate	21 %	35 %
State income taxes, net of federal income tax benefit	5	4
Increases (decreases) in tax from:		
Resolutions of income tax audit and other	38	-
Tax Reform	-	56
Adjustments attributable to tax returns	13	(1)
Texas margin tax, net of federal tax effect	6	3
Executive officer non-deductible compensation	15	2
Non-deductible business meals	2	1
Insurance fund income	-	(1)
Penalties	-	1
Effective income tax rate	<u>100 %</u>	<u>100 %</u>

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The components of the accumulated deferred income taxes at Dec. 31 were as follows:

(Thousands of Dollars)	2018	2017
Deferred tax liabilities:		
Employee benefits	\$ 19,326	\$ 20,094
Differences between book and tax bases of property	1,843	1,446
Other	187	523
Total deferred tax liabilities	<u>\$ 21,356</u>	<u>\$ 22,063</u>
Deferred tax assets:		
Employee benefits	\$ 45,158	\$ 43,410
Other	4,483	2,650
Total deferred tax assets	<u>\$ 49,641</u>	<u>\$ 46,060</u>
Net deferred tax asset	<u>\$ (28,285)</u>	<u>\$ (23,997)</u>

7. Financial Instruments

In June 2016, XES established rabbi trusts to provide partial funding for future distributions of its supplemental executive retirement plan and deferred compensation plan. The following table presents the cost and fair value of the assets held in rabbi trusts at Dec. 31, 2018 and 2017:

(Millions of Dollars)	Dec. 31, 2018				
	Cost	Fair Value			Total
		Level 1	Level 2	Level 3	
Rabbi Trusts^(a)					
Cash equivalents	\$ 13	\$ 13	\$ -	\$ -	\$ 13
Mutual funds	37	37	-	-	37
Total	<u>\$ 50</u>	<u>\$ 50</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 50</u>
(Millions of Dollars)	Dec. 31, 2017				
	Cost	Fair Value			Total
		Level 1	Level 2	Level 3	
Rabbi Trusts^(a)					
Cash equivalents	\$ 11	\$ 11	\$ -	\$ -	\$ 11
Mutual funds	32	34	-	-	34
Total	<u>\$ 43</u>	<u>\$ 45</u>	<u>\$ -</u>	<u>\$ -</u>	<u>\$ 45</u>

^(a) Reported as other investments on the balance sheet.

As of Dec. 31, 2018 and 2017, there were no financial instruments for which carrying amount did not equal fair value.

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Schedule XV- Comparative Income Statement				
Line No.	Account Number (a)	Title of Account (b)	Current Year (c)	Prior Year (d)
1		SERVICE COMPANY OPERATING REVENUES		
2	400	Service Company Operating Revenues	1,365,832,804	1,345,415,785
3		SERVICE COMPANY OPERATING EXPENSES		
4	401	Operation Expenses	866,865,817	837,889,409
5	402	Maintenance Expenses	16,627,241	18,141,289
6	403	Depreciation Expenses		
7	403.1	Depreciation Expense for Asset Retirement Costs		
8	404	Amortization of Limited-Term Property		
9	405	Amortization of Other Property		
10	407.3	Regulatory Debits		
11	407.4	Regulatory Credits		
12	408.1	Taxes Other Than Income Taxes, Operating Income	20,113,285	19,878,182
13	409.1	Income Taxes, Operating Income	(13,303,106)	(21,289,997)
14	410.1	Provision for Deferred Income Taxes, Operating Income		
15	411.1	Provision for Deferred Income Taxes – Credit , Operating Income		
16	411.4	Investment Tax Credit, Service Company Property		
17	411.6	Gains from Disposition of Service Company Plant		
18	411.7	Losses from Disposition of Service Company Plant		
19	411.10	Accretion Expense		
20	412	Costs and Expenses of Construction or Other Services	429,194,493	442,130,233
21	416	Costs and Expenses of Merchandising, Jobbing, and Contract Work		
22		TOTAL SERVICE COMPANY OPERATING EXPENSES (Total of Lines 4-21)	1,319,497,730	1,296,749,116
23		NET SERVICE COMPANY OPERATING INCOME (Total of Lines 2 less 22)	46,335,074	48,666,669
24		OTHER INCOME		
25	418.1	Equity in Earnings of Subsidiary Companies		
26	419	Interest and Dividend Income	1,727,968	3,424,492
27	419.1	Allowance for Other Funds Used During Construction		
28	421	Miscellaneous Income or Loss		
29	421.1	Gain on Disposition of Property		
30		TOTAL OTHER INCOME (Total of Lines 25-29)	1,727,968	3,424,492
31		OTHER INCOME DEDUCTIONS		
32	421.2	Loss on Disposition of Property		
33	425	Miscellaneous Amortization		
34	426.1	Donations	13,208,190	2,423,425
35	426.2	Life Insurance	(242,554)	(419,466)
36	426.3	Penalties	174,412	76,076
37	426.4	Expenditures for Certain Civic, Political and Related Activities	2,202,956	4,003,542
38	426.5	Other Deductions	761,086	663,501
39		TOTAL OTHER INCOME DEDUCTIONS (Total of Lines 32-38)	16,104,090	6,747,078
40		TAXES APPLICABLE TO OTHER INCOME AND DEDUCTIONS		

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Schedule XV- Comparative Income Statement (continued)				
Line No.	Account Number (a)	Title of Account (b)	Current Year (c)	Prior Year (d)
41	408.2	Taxes Other Than Income Taxes, Other Income and Deductions	456,634	145,592
42	409.2	Income Taxes, Other Income and Deductions	31,691,071	36,680,480
43	410.2	Provision for Deferred Income Taxes, Other Income and Deductions	(5,084,859)	5,900,374
44	411.2	Provision for Deferred Income Taxes – Credit, Other Income and Deductions		(859)
45	411.5	Investment Tax Credit, Other Income Deductions		
46		TOTAL TAXES APPLICABLE TO OTHER INCOME AND DEDUCTIONS (Total of Lines 41-45)	27,062,846	42,725,587
47		INTEREST CHARGES		
48	427	Interest on Long-Term Debt		
49	428	Amortization of Debt Discount and Expense		
50	429	(less) Amortization of Premium on Debt- Credit		
51	430	Interest on Debt to Associate Companies	4,882,814	2,498,664
52	431	Other Interest Expense	13,292	119,832
53	432	(less) Allowance for Borrowed Funds Used During Construction-Credit		
54		TOTAL INTEREST CHARGES (Total of Lines 48-53)	4,896,106	2,618,496
55		NET INCOME BEFORE EXTRAORDINARY ITEMS (Total of Lines 23, 30, minus 39, 46, and 54)		
56		EXTRAORDINARY ITEMS		
57	434	Extraordinary Income		
58	435	(less) Extraordinary Deductions		
59		Net Extraordinary Items (Line 57 less Line 58)		
60	409.4	(less) Income Taxes, Extraordinary		
61		Extraordinary Items After Taxes (Line 59 less Line 60)		
62		NET INCOME OR LOSS/COST OF SERVICE (Total of Lines 55-61)		

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FOOTNOTE DATA			

Schedule Page: 301 Line No.: 35 Column: c

FERC Account 426.2-Life Insurance:

The balance in FERC account 426.2 includes the net premiums less increase in cash surrender value of policies.

Cash surrender value of policies	(\$347,472)
Premiums	104,918
Total	<u>(\$242,554)</u>

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Schedule XVI- Analysis of Charges for Service- Associate and Non-Associate Companies								
1. Total cost of service will equal for associate and nonassociate companies the total amount billed under their separate analysis of billing schedules.								
Line No.	Account Number (a)	Title of Account (b)	Associate Company Direct Cost (c)	Associate Company Indirect Cost (d)	Associate Company Total Cost (e)	Nonassociate Company Direct Cost (f)	Nonassociate Company Indirect Cost (g)	Nonassociate Company Total Cost (h)
1	403-403.1	Depreciation Expense						
2	404-405	Amortization Expense						
3	407.3-407.4	Regulatory Debits/Credits – Net						
4	408.1-408.2	Taxes Other Than Income Taxes	8,079,395	12,490,524	20,569,919			
5	409.1-409.3	Income Taxes	18,387,965		18,387,965			
6	410.1-411.2	Provision for Deferred Taxes	(5,084,859)		(5,084,859)			
7	411.1-411.2	Provision for Deferred Taxes – Credit						
8	411.6	Gain from Disposition of Service Company Plant						
9	411.7	Losses from Disposition of Service Company Plant						
10	411.4-411.5	Investment Tax Credit Adjustment						
11	411.10	Accretion Expense						
12	412	Costs and Expenses of Construction or Other Services	429,194,493		429,194,493			
13	416	Costs and Expenses of Merchandising, Jobbing, and Contract Work for Associated Companies						
14	418	Non-operating Rental Income						
15	418.1	Equity in Earnings of Subsidiary Companies						
16	419	Interest and Dividend Income	1,376,644	351,324	1,727,968			
17	419.1	Allowance for Other Funds Used During Construction						
18	421	Miscellaneous Income or Loss						
19	421.1	Gain on Disposition of Property						
20	421.2	Loss on Disposition Of Property						
21	425	Miscellaneous Amortization						
22	426.1	Donations	201,672	13,006,518	13,208,190			
23	426.2	Life Insurance		(242,554)	(242,554)			
24	426.3	Penalties	173,530	882	174,412			
25	426.4	Expenditures for Certain Civic, Political and Related Activities	398,980	1,803,976	2,202,956			
26	426.5	Other Deductions	197,208	563,878	761,086			
27	427	Interest On Long-Term Debt						
28	428	Amortization of Debt Discount and Expense						
29	429	Amortization of Premium on Debt – Credit						
30	430	Interest on Debt to Associate Companies	4,882,814		4,882,814			
31	431	Other Interest Expense		13,292	13,292			
32	432	Allowance for Borrowed Funds Used During Construction						
33	500-509	Total Steam Power Generation Operation Expenses	31,086,485	7,313,059	38,399,544			
34	510-515	Total Steam Power Generation Maintenance Expenses	10,224,130	904	10,225,034			

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Line No.	Account Number (a)	Title of Account (b)	Associate Company Direct Cost (c)	Associate Company Indirect Cost (d)	Associate Company Total Cost (e)	Nonassociate Company Direct Cost (f)	Nonassociate Company Indirect Cost (g)	Nonassociate Company Total Cost (h)
35	517-525	Total Nuclear Power Generation Operation Expenses	15,791,256		15,791,256			
36	528-532	Total Nuclear Power Generation Maintenance Expenses	541,176		541,176			
37	535-540.1	Total Hydraulic Power Generation Operation Expenses	2,227,084	363,312	2,590,396			
38	541-545.1	Total Hydraulic Power Generation Maintenance Expenses	55,272	29	55,301			
39	546-550.1	Total Other Power Generation Operation Expenses	5,061,808	2,107,757	7,169,565			
40	551-554.1	Total Other Power Generation Maintenance Expenses	1,347,797	332	1,348,129			
41	555-557	Total Other Power Supply Operation Expenses	10,242,314	4,666,383	14,908,697			
42	560	Operation Supervision and Engineering	9,444,951	15,589,220	25,034,171			
43	561.1	Load Dispatch-Reliability	1,826		1,826			
44	561.2	Load Dispatch-Monitor and Operate Transmission System	2,302,447	5,315,409	7,617,856			
45	561.3	Load Dispatch-Transmission Service and Scheduling	3,528		3,528			
46	561.4	Scheduling, System Control and Dispatch Services						
47	561.5	Reliability Planning and Standards Development	308,547	181	308,728			
48	561.6	Transmission Service Studies	155,616		155,616			
49	561.7	Generation Interconnection Studies	116,618		116,618			
50	561.8	Reliability Planning and Standards Development Services	3,283		3,283			
51	562	Station Expenses (Major Only)	137,733		137,733			
52	563	Overhead Line Expenses (Major Only)	81,811		81,811			
53	564	Underground Line Expenses (Major Only)	242		242			
54	565	Transmission of Electricity by Others (Major Only)						
55	566	Miscellaneous Transmission Expenses (Major Only)	5,919,476	51,978	5,971,454			
56	567	Rents	6,179,683	7,762	6,187,445			
57	567.1	Operation Supplies and Expenses (Nonmajor Only)						
58		Total Transmission Operation Expenses	24,655,761	20,964,550	45,620,311			
59	568	Maintenance Supervision and Engineering (Major Only)	(27,130)		(27,130)			
60	569	Maintenance of Structures (Major Only)						
61	569.1	Maintenance of Computer Hardware						
62	569.2	Maintenance of Computer Software						
63	569.3	Maintenance of Communication Equipment						
64	569.4	Maintenance of Miscellaneous Regional Transmission Plant						
65	570	Maintenance of Station Equipment (Major Only)	65,504		65,504			
66	571	Maintenance of Overhead Lines (Major Only)	180,919		180,919			
67	572	Maintenance of Underground Lines (Major Only)	369		369			
68	573	Maintenance of Miscellaneous Transmission Plant (Major Only)						

Name of Respondent Xcel Energy Services Inc.			This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission		Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>		
Line No.	Account Number (a)	Title of Account (b)	Associate Company Direct Cost (c)	Associate Company Indirect Cost (d)	Associate Company Total Cost (e)	Nonassociate Company Direct Cost (f)	Nonassociate Company Indirect Cost (g)	Nonassociate Company Total Cost (h)
69	574	Maintenance of Transmission Plant (Nonmajor Only)						
70		Total Transmission Maintenance Expenses	219,662		219,662			
71	575.1-575.8	Total Regional Market Operation Expenses	1,306,238		1,306,238			
72	576.1-576.5	Total Regional Market Maintenance Expenses						
73	580-589	Total Distribution Operation Expenses	32,768,333	6,493,127	39,261,460			
74	590-598	Total Distribution Maintenance Expenses	1,941,508		1,941,508			
75		Total Electric Operation and Maintenance Expenses	592,523,378	69,194,645	661,718,023			
76	700-798	Production Expenses (Provide selected accounts in a footnote)	341,268		341,268			
77	800-813	Total Other Gas Supply Operation Expenses	670,181		670,181			
78	814-826	Total Underground Storage Operation Expenses	37,361		37,361			
79	830-837	Total Underground Storage Maintenance Expenses	31,664		31,664			
80	840-842.3	Total Other Storage Operation Expenses	587,926		587,926			
81	843.1-843.9	Total Other Storage Maintenance Expenses	11,723		11,723			
82	844.1-846.2	Total Liquefied Natural Gas Terminating and Processing Operation Expenses	24,932		24,932			
83	847.1-847.8	Total Liquefied Natural Gas Terminating and Processing Maintenance Expenses	66,347		66,347			
84	850	Operation Supervision and Engineering	1,037,833	1,159,185	2,197,018			
85	851	System Control and Load Dispatching	183,066	823,702	1,006,768			
86	852	Communication System Expenses	6		6			
87	853	Compressor Station Labor and Expenses	8,762		8,762			
88	854	Gas for Compressor Station Fuel						
89	855	Other Fuel and Power for Compressor Stations						
90	856	Mains Expenses	63,993		63,993			
91	857	Measuring and Regulating Station Expenses	6,013		6,013			
92	858	Transmission and Compression of Gas By Others						
93	859	Other Expenses	111,314	375	111,689			
94	860	Rents	1,051,177		1,051,177			
95		Total Gas Transmission Operation Expenses	2,462,164	1,983,262	4,445,426			
96	861	Maintenance Supervision and Engineering						
97	862	Maintenance of Structures and Improvements	9,828		9,828			
98	863	Maintenance of Mains	4,506		4,506			
99	864	Maintenance of Compressor Station Equipment	1,327		1,327			
100	865	Maintenance of Measuring And Regulating Station Equipment	1,908	21,634	23,542			
101	866	Maintenance of Communication Equipment	2		2			
102	867	Maintenance of Other Equipment						
103		Total Gas Transmission Maintenance Expenses	17,571	21,634	39,205			
104	870-881	Total Distribution Operation Expenses	13,265,295	10,864,787	24,130,082			

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Line No.	Account Number (a)	Title of Account (b)	Associate Company Direct Cost (c)	Associate Company Indirect Cost (d)	Associate Company Total Cost (e)	Nonassociate Company Direct Cost (f)	Nonassociate Company Indirect Cost (g)	Nonassociate Company Total Cost (h)
105	885-894	Total Distribution Maintenance Expenses	575,586		575,586			
106		Total Natural Gas Operation and Maintenance Expenses	18,092,018	12,869,683	30,961,701			
107	901	Supervision	1,228	273,100	274,328			
108	902	Meter reading expenses	293,296	6,200,322	6,493,618			
109	903	Customer records and collection expenses	12,507,717	47,138,632	59,646,349			
110	904	Uncollectible accounts						
111	905	Miscellaneous customer accounts expenses						
112	906	Total Customer Accounts Operation Expenses	12,802,241	53,612,054	66,414,295			
113	907	Supervision						
114	908	Customer assistance expenses	2,095,907	469,459	2,565,366			
115	909	Informational And Instructional Advertising Expenses	687,465	2,308,057	2,995,522			
116	910	Miscellaneous Customer Service And Informational Expenses	280,356		280,356			
117		Total Service and Informational Operation Accounts	3,063,728	2,777,516	5,841,244			
118	911	Supervision						
119	912	Demonstrating and Selling Expenses	7,845		7,845			
120	913	Advertising Expenses						
121	916	Miscellaneous Sales Expenses						
122		Total Sales Operation Expenses	7,845		7,845			
123	920	Administrative and General Salaries	28,308,410	149,382,165	177,690,575			
124	921	Office Supplies and Expenses	29,232,704	93,264,231	122,496,935			
125	923	Outside Services Employed	5,645,779	72,093,132	77,738,911			
126	924	Property Insurance	(297,232)	70,016	(227,216)			
127	925	Injuries and Damages	1,296,022	14,706,099	16,002,121			
128	926	Employee Pensions and Benefits	33,420,535	49,318,743	82,739,278			
129	928	Regulatory Commission Expenses	32,200	11,182	43,382			
130	930.1	General Advertising Expenses	1,458,484	7,941,268	9,399,752			
131	930.2	Miscellaneous General Expenses	1,082,411	7,772,292	8,854,703			
132	931	Rents	31,702,345	72,877,182	104,579,527			
133		Total Administrative and General Operation Expenses	131,881,658	467,436,310	599,317,968			
134	935	Maintenance of Structures and Equipment	30,700	1,541,028	1,571,728			
135		Total Administrative and General Maintenance Expenses	147,786,172	525,366,908	673,153,080			
136		Total Cost of Service	758,401,568	607,431,236	1,365,832,804			

Name of Respondent Xcel Energy Services Inc.		This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission		Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
Schedule XVI- Analysis of Charges for Service- Associate and Non-Associate Companies (continued)					
Line No.	Account Number (a)	Title of Account (b)	Total Charges for Services Direct Cost (i)	Total Charges for Services Indirect Cost (j)	Total Charges for Services Total Cost (k)
1	403-403.1	Depreciation Expense			
2	404-405	Amortization Expense			
3	407.3-407.4	Regulatory Debits/Credits – Net			
4	408.1-408.2	Taxes Other Than Income Taxes	8,079,395	12,490,524	20,569,919
5	409.1-409.3	Income Taxes	18,387,965		18,387,965
6	410.1-411.2	Provision for Deferred Taxes	(5,084,859)		(5,084,859)
7	411.1-411.2	Provision for Deferred Taxes – Credit			
8	411.6	Gain from Disposition of Service Company Plant			
9	411.7	Losses from Disposition of Service Company Plant			
10	411.4-411.5	Investment Tax Credit Adjustment			
11	411.10	Accretion Expense			
12	412	Costs and Expenses of Construction or Other Services	429,194,493		429,194,493
13	416	Costs and Expenses of Merchandising, Jobbing, and Contract Work for Associated Companies			
14	418	Non-operating Rental Income			
15	418.1	Equity in Earnings of Subsidiary Companies			
16	419	Interest and Dividend Income	1,376,644	351,324	1,727,968
17	419.1	Allowance for Other Funds Used During Construction			
18	421	Miscellaneous Income or Loss			
19	421.1	Gain on Disposition of Property			
20	421.2	Loss on Disposition Of Property			
21	425	Miscellaneous Amortization			
22	426.1	Donations	201,672	13,006,518	13,208,190
23	426.2	Life Insurance		(242,554)	(242,554)
24	426.3	Penalties	173,530	882	174,412
25	426.4	Expenditures for Certain Civic, Political and Related Activities	398,980	1,803,976	2,202,956
26	426.5	Other Deductions	197,208	563,878	761,086
27	427	Interest On Long-Term Debt			
28	428	Amortization of Debt Discount and Expense			
29	429	Amortization of Premium on Debt – Credit			
30	430	Interest on Debt to Associate Companies	4,882,814		4,882,814
31	431	Other Interest Expense		13,292	13,292
32	432	Allowance for Borrowed Funds Used During Construction			
33	500-509	Total Steam Power Generation Operation Expenses	31,086,485	7,313,059	38,399,544
34	510-515	Total Steam Power Generation Maintenance Expenses	10,224,130	904	10,225,034

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Schedule XVI- Analysis of Charges for Service- Associate and Non-Associate Companies (continued)					
Line No.	Account Number (a)	Title of Account (b)	Total Charges for Services Direct Cost (i)	Total Charges for Services Indirect Cost (j)	Total Charges for Services Total Cost (k)
35	517-525	Total Nuclear Power Generation Operation Expenses	15,791,256		15,791,256
36	528-532	Total Nuclear Power Generation Maintenance Expenses	541,176		541,176
37	535-540.1	Total Hydraulic Power Generation Operation Expenses	2,227,084	363,312	2,590,396
38	541-545.1	Total Hydraulic Power Generation Maintenance Expenses	55,272	29	55,301
39	546-550.1	Total Other Power Generation Operation Expenses	5,061,808	2,107,757	7,169,565
40	551-554.1	Total Other Power Generation Maintenance Expenses	1,347,797	332	1,348,129
41	555-557	Total Other Power Supply Operation Expenses	10,242,314	4,666,383	14,908,697
42	560	Operation Supervision and Engineering	9,444,951	15,589,220	25,034,171
43	561.1	Load Dispatch-Reliability	1,826		1,826
44	561.2	Load Dispatch-Monitor and Operate Transmission System	2,302,447	5,315,409	7,617,856
45	561.3	Load Dispatch-Transmission Service and Scheduling	3,528		3,528
46	561.4	Scheduling, System Control and Dispatch Services			
47	561.5	Reliability Planning and Standards Development	308,547	181	308,728
48	561.6	Transmission Service Studies	155,616		155,616
49	561.7	Generation Interconnection Studies	116,618		116,618
50	561.8	Reliability Planning and Standards Development Services	3,283		3,283
51	562	Station Expenses (Major Only)	137,733		137,733
52	563	Overhead Line Expenses (Major Only)	81,811		81,811
53	564	Underground Line Expenses (Major Only)	242		242
54	565	Transmission of Electricity by Others (Major Only)			
55	566	Miscellaneous Transmission Expenses (Major Only)	5,919,476	51,978	5,971,454
56	567	Rents	6,179,683	7,762	6,187,445
57	567.1	Operation Supplies and Expenses (Nonmajor Only)			
58		Total Transmission Operation Expenses	24,655,761	20,964,550	45,620,311
59	568	Maintenance Supervision and Engineering (Major Only)	(27,130)		(27,130)
60	569	Maintenance of Structures (Major Only)			
61	569.1	Maintenance of Computer Hardware			
62	569.2	Maintenance of Computer Software			
63	569.3	Maintenance of Communication Equipment			
64	569.4	Maintenance of Miscellaneous Regional Transmission Plant			
65	570	Maintenance of Station Equipment (Major Only)	65,504		65,504
66	571	Maintenance of Overhead Lines (Major Only)	180,919		180,919
67	572	Maintenance of Underground Lines (Major Only)	369		369
68	573	Maintenance of Miscellaneous Transmission Plant (Major Only)			

Name of Respondent Xcel Energy Services Inc.		This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission		Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
Schedule XVI- Analysis of Charges for Service- Associate and Non-Associate Companies (continued)					
Line No.	Account Number (a)	Title of Account (b)	Total Charges for Services Direct Cost (i)	Total Charges for Services Indirect Cost (j)	Total Charges for Services Total Cost (k)
69	574	Maintenance of Transmission Plant (Nonmajor Only)			
70		Total Transmission Maintenance Expenses	219,662		219,662
71	575.1-575.8	Total Regional Market Operation Expenses	1,306,238		1,306,238
72	576.1-576.5	Total Regional Market Maintenance Expenses			
73	580-589	Total Distribution Operation Expenses	32,768,333	6,493,127	39,261,460
74	590-598	Total Distribution Maintenance Expenses	1,941,508		1,941,508
75		Total Electric Operation and Maintenance Expenses	592,523,378	69,194,645	661,718,023
76	700-798	Production Expenses (Provide selected accounts in a footnote)	341,268		341,268
77	800-813	Total Other Gas Supply Operation Expenses	670,181		670,181
78	814-826	Total Underground Storage Operation Expenses	37,361		37,361
79	830-837	Total Underground Storage Maintenance Expenses	31,664		31,664
80	840-842.3	Total Other Storage Operation Expenses	587,926		587,926
81	843.1-843.9	Total Other Storage Maintenance Expenses	11,723		11,723
82	844.1-846.2	Total Liquefied Natural Gas Terminating and Processing Operation Expenses	24,932		24,932
83	847.1-847.8	Total Liquefied Natural Gas Terminating and Processing Maintenance Expenses	66,347		66,347
84	850	Operation Supervision and Engineering	1,037,833	1,159,185	2,197,018
85	851	System Control and Load Dispatching.	183,066	823,702	1,006,768
86	852	Communication System Expenses	6		6
87	853	Compressor Station Labor and Expenses	8,762		8,762
88	854	Gas for Compressor Station Fuel			
89	855	Other Fuel and Power for Compressor Stations			
90	856	Mains Expenses	63,993		63,993
91	857	Measuring and Regulating Station Expenses	6,013		6,013
92	858	Transmission and Compression of Gas By Others			
93	859	Other Expenses	111,314	375	111,689
94	860	Rents	1,051,177		1,051,177
95		Total Gas Transmission Operation Expenses	2,462,164	1,983,262	4,445,426
96	861	Maintenance Supervision and Engineering			
97	862	Maintenance of Structures and Improvements	9,828		9,828
98	863	Maintenance of Mains	4,506		4,506
99	864	Maintenance of Compressor Station Equipment	1,327		1,327
100	865	Maintenance of Measuring And Regulating Station Equipment	1,908	21,634	23,542
101	866	Maintenance of Communication Equipment	2		2
102	867	Maintenance of Other Equipment			
103		Total Gas Transmission Maintenance Expenses	17,571	21,634	39,205
104	870-881	Total Distribution Operation Expenses	13,265,295	10,864,787	24,130,082

Name of Respondent Xcel Energy Services Inc.		This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission		Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
Schedule XVI- Analysis of Charges for Service- Associate and Non-Associate Companies (continued)					
Line No.	Account Number (a)	Title of Account (b)	Total Charges for Services Direct Cost (i)	Total Charges for Services Indirect Cost (j)	Total Charges for Services Total Cost (k)
105	885-894	Total Distribution Maintenance Expenses	575,586		575,586
106		Total Natural Gas Operation and Maintenance Expenses	18,092,018	12,869,683	30,961,701
107	901	Supervision	1,228	273,100	274,328
108	902	Meter reading expenses	293,296	6,200,322	6,493,618
109	903	Customer records and collection expenses	12,507,717	47,138,632	59,646,349
110	904	Uncollectible accounts			
111	905	Miscellaneous customer accounts expenses			
112	906	Total Customer Accounts Operation Expenses	12,802,241	53,612,054	66,414,295
113	907	Supervision			
114	908	Customer assistance expenses	2,095,907	469,459	2,565,366
115	909	Informational And Instructional Advertising Expenses	687,465	2,308,057	2,995,522
116	910	Miscellaneous Customer Service And Informational Expenses	280,356		280,356
117		Total Service and Informational Operation Accounts	3,063,728	2,777,516	5,841,244
118	911	Supervision			
119	912	Demonstrating and Selling Expenses	7,845		7,845
120	913	Advertising Expenses			
121	916	Miscellaneous Sales Expenses			
122		Total Sales Operation Expenses	7,845		7,845
123	920	Administrative and General Salaries	28,308,410	149,382,165	177,690,575
124	921	Office Supplies and Expenses	29,232,704	93,264,231	122,496,935
125	923	Outside Services Employed	5,645,779	72,093,132	77,738,911
126	924	Property Insurance	(297,232)	70,016	(227,216)
127	925	Injuries and Damages	1,296,022	14,706,099	16,002,121
128	926	Employee Pensions and Benefits	33,420,535	49,318,743	82,739,278
129	928	Regulatory Commission Expenses	32,200	11,182	43,382
130	930.1	General Advertising Expenses	1,458,484	7,941,268	9,399,752
131	930.2	Miscellaneous General Expenses	1,082,411	7,772,292	8,854,703
132	931	Rents	31,702,345	72,877,182	104,579,527
133		Total Administrative and General Operation Expenses	131,881,658	467,436,310	599,317,968
134	935	Maintenance of Structures and Equipment	30,700	1,541,028	1,571,728
135		Total Administrative and General Maintenance Expenses	147,786,172	525,366,908	673,153,080
136		Total Cost of Service	758,401,568	607,431,236	1,365,832,804

Name of Respondent Xcel Energy Services Inc.		This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission		Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
Schedule XVII - Analysis of Billing – Associate Companies (Account 457)					
1. For services rendered to associate companies (Account 457), list all of the associate companies.					
Line No.	Name of Associate Company (a)	Account 457.1 Direct Costs Charged (b)	Account 457.2 Indirect Costs Charged (c)	Account 457.3 Compensation For Use of Capital (d)	Total Amount Billed (e)
1	NSP-Minnesota	278,325,334	254,747,155	1,722,251	534,794,740
2	PSCo	304,861,946	211,922,938	1,816,191	518,601,075
3	SPS	116,822,005	77,185,254	1,071,156	195,078,415
4	NSP-Wisconsin	45,627,763	40,974,037	232,989	86,834,789
5	Xcel Energy, Inc.	3,687,140	21,913,331	31,265	25,631,736
6	Xcel Energy Joint Ventures	1,934,279			1,934,279
7	e-prime, Inc.	865,069			865,069
8	Nicollet Projects I, LLC	433,696	34,983	(42)	468,637
9	Xcel Energy Transmission Development Company, LLC	451,379	338	1,447	453,164
10	Capital Services, LLC	68,088	220,233	1,046	289,367
11	Xcel Energy WYCO, Inc.	71,737	200,980	7,200	279,917
12	Eloigne Company	79,660	159,741	635	240,036
13	Chippewa and Flambeau Improvement Company	56,957	4,282	309	61,548
14	Quixx Corporation	55,732			55,732
15	Xcel Energy Ventures Inc.	54,416		10	54,426
16	1480 Welton, Inc.	6,020	31,719	(2,308)	35,431
17	P.S.R. Investments, Inc.	8,830	9,160	533	18,523
18	WestGas Interstate, Inc.	15,638	1,892	13	17,543
19	Energy Impact Fund Investments	3,706	13,615	8	17,329
20	Clearwater Investments, Inc.	11,565	3,281	20	14,866
21	Xcel Energy Wholesale Group Inc.	14,445			14,445
22	Xcel Energy Transmission Holding Company, LLC	8,154	1,567	44	9,765
23	Xcel Energy Performance Contracting Inc.	8,098	839	18	8,955
24	Xcel Energy Retail Holdings Inc.	7,837		5	7,842
25	Xcel Energy Southwest Transmission Company, LLC	5,238	1,000	12	6,250
26	Xcel Energy Communications Group Inc.	4,842		2	4,844
27	Xcel Energy Markets Holdings, Inc.	4,736		3	4,739
28	Xcel Energy Ventures Holdings	4,379			4,379
29	Nicollet Holdings Company	4,334			4,334
30	Seren Innovations, Inc.	3,789			3,789
31	Xcel Energy International, Inc.	3,751			3,751
32	Xcel Energy West Transmission Company, LLC	3,717		(1)	3,716
33	Reddy Kilowatt Corporation	150	3,524	3	3,677
34	United Power and Land Company	1,239	1,166	2	2,407
35	NSP Lands, Inc.	2,023	201	1	2,225
36	Xcel Energy Investments	762		2	764
37	Quixxlin Corporation	300			300
38					
39					
40	Total	753,518,754	607,431,236	4,882,814	1,365,832,804

Name of Respondent Xcel Energy Services Inc.	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year of Report 2018
FOOTNOTE DATA			

Schedule Page: 307 Line No.: 6 Column: e

Xcel Energy Joint Ventures:

This amount represents the combined total of all Xcel Energy Joint Ventures as listed below:

Joint Venture Sherco 3	\$1,115,255
Joint Venture Hayden	380,935
Joint Venture CAPX	366,664
Joint Vent Comanche 3	71,425
	<u>\$1,934,279</u>

Name of Respondent Xcel Energy Services Inc.	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
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Schedule XVIII – Analysis of Billing – Non-Associate Companies (Account 458)

1. For services rendered to nonassociate companies (Account 458), list all of the nonassociate companies. In a footnote, describe the services rendered to each respective nonassociate company.

Line No.	Name of Non-associate Company (a)	Account 458.1 Direct Costs Charged (b)	Account 458.2 Indirect Costs Charged (c)	Account 458.3 Compensation For Use of Capital (d)	Account 458.4 Excess or Deficiency on Servicing Non-associate Utility Companies (e)	Total Amount Billed (f)
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
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22						
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25						
26						
27						
28						
29						
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31						
32						
33						
34						
35						
36						
37						
38						
39						
40	Total					

Name of Respondent Xcel Energy Services Inc.	This Report Is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year/Period of Report Dec 31, <u>2018</u>
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Schedule XIX - Miscellaneous General Expenses - Account 930.2

1. Provide a listing of the amount included in Account 930.2, "Miscellaneous General Expenses" classifying such expenses according to their nature. Amounts less than \$50,000 may be grouped showing the number of items and the total for the group.
2. Payments and expenses permitted by Section 321 (b)(2) of the Federal Election Campaign Act, as amended by Public Law 94-283 in 1976 (2 U.S.C. 441(b)(2)) shall be separately classified.

Line No.	Title of Account (a)	Amount (b)
1	Utility Association Dues	4,358,674
2	Board of Directors Fess and Expenses	3,345,450
3	Shareholder Relation Expenses	1,030,123
4	SEC Filing and Shareholder Reporting Expenses	120,456
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
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25		
26		
27		
28		
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36		
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38		
39		
40	Total	8,854,703

Name of Respondent Xcel Energy Services Inc.	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year of Report 2018
Schedule XX - Organization Chart			

1. Provide a graphical presentation of the relationships and inter relationships within the service company that identifies lines of authority and responsibility in the organization.

Organization Chart	Service Function *
Chief Executive Officer (CEO)	Executive Management
Corporate Other	Accounting, Financial Reporting & Taxes
Corporate Secretary & Executive Services	Executive Management
Communications	Executive Management
Corporate Communications	Corporate Communications, Employee Communications
Strategic Communications	Corporate Communications, Employee Communications, Marketing & Sales
Corporate Compliance	Executive Management
Shareholder Relations	Corporate Communications, Investor Relations
Strategy & Planning	Corporate Strategy & Business Development
Utilities & Corporate Services	Executive Management
Employee & Business Services	Executive Management
Aviation & Travel Services	Aviation Services
Enterprise Security	Executive Management & Facilities & Real Estate
Property Services	Facilities Admin. Services & Facilities & Real Estate
Workforce Relations & Safety	Energy Supply Business Resources & Human Resources
Business Systems	Business Systems
Chief Administrative Office (CAO)	Executive Management, Government Affairs
Corporate Giving	Corporate Communications
Resource Planning	Energy Markets Regulated Trading & Marketing
Human Resources	Human Resources
Payroll	Payroll
Marketing	Marketing & Sales
Group President	Executive Management
NSPM President	Government Affairs & Rates & Regulation
NSPW President	Government Affairs & Rates & Regulation
PSCo President	Government Affairs & Rates & Regulation
SPS President	Government Affairs & Rates & Regulation
Financial Operations	Accounting, Financial Reporting & Taxes
Chief Financial Officer	Accounting, Financial Reporting & Taxes
Controller	Accounting, Financial Reporting & Taxes
Corporate Development	Corporate Strategy & Business Development
Financial Planning	Accounting, Financial Reporting & Taxes, Finance & Treasury, Rates & Regulation
Investor Relations	Investor Relations
Revenue Requirements	Rates & Regulation
Risk Management & Audit Services	Finance & Treasury, Internal Audit
Tax Services	Accounting, Financial Reporting & Taxes
Treasurer	Finance & Treasury

Name of Respondent	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year of Report 2018
Schedule XX - Organization Chart			

Corporate Policy & Federal Affairs	Government Affairs; Rates & Regulation & Business Systems
General Counsel	Legal
Claims	Claims Services
Legal Services	Legal
Operations Services	Executive Management
Commercial Operations	Energy Markets Regulated Trading & Marketing & Energy Markets – Fuel Procurement
Customer Care	Customer Service; Receipts Processing
Enterprise Transformation Office (ETO)	Information Technology
Distribution Operations	Construction O&M; Energy Delivery Marketing; Engineering/Design
Gas Systems	Engineering/Design; Construction O&M; Executive Management
Energy Supply	Energy Supply Business Resources
Engineering & Construction	Energy Supply Engineering & Environmental; Energy Supply Business Resources
Environmental	Energy Supply Engineering & Environmental
Operations (Regional Generation)	Energy Supply Business Resources
Technical Services	Energy Supply Business Resources
Supply Chain	Supply Chain; Supply Chain Special Programs; Payment & Reporting & Fleet
Transmission	Engineering/Design; Construction O&M; Engineering/Design-Electric Transmission/Substations

* The “Service Function” column sets forth the primary service functions for each area; however, others may be used based on a case-by-case basis depending on the specific work being performed.

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Schedule XXI - Methods of Allocation			

1. Indicate the service department or function and the basis for allocation used when employees render services to more than one department or functional group. If a ratio, include the numerator and denominator.
2. Include any other allocation methods used to allocate costs.

Service Department or Function	Basis of Allocation*
Executive Management Services	Executive Management indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.
Investor Relations	Investor Relations indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue ratio, the Employee Ratio and the Total Assets Ratio.
Internal Audit	Internal Audit indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.
Legal	Legal indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.
Claims Services	Claims Services costs will be direct charged. Any costs that cannot be direct charged will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.
Corporate Communications	Corporate Communications indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.
Employee Communications	Employee Communications indirect costs will be allocated based on the Employee Ratio.
Corporate Strategy & Business Development	Corporate Strategy & Business Development indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.
Government Affairs	Government Affairs indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.
Facilities & Real Estate	Facilities & Real Estate indirect costs will be allocated to the Operating Companies and Affiliate Companies based on the Employee Ratio.

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Facilities Administrative Services	Facilities Administrative Services indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.
Supply Chain	Supply Chain will be direct charged. Any management and oversight of the payment and reporting services activities that cannot be direct charged will be allocated using the Invoice Transaction Ratio.
Supply Chain Special Programs	Supply Chain Special Programs indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.
Human Resources	Human Resources indirect costs will be allocated based on the Employee Ratio.
Finance & Treasury	All Finance & Treasury indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio, except for: (1) indirect costs associated with proprietary trading activities, which will be allocated based on the Joint Operating Agreement Peak Hour Megawatt Load Ratio, provided, however, that indirect costs provided jointly for both generation trading activities and proprietary trading activities will be allocated based on the Joint Operating Agreement Labor Hours Ratio.
Accounting, Financial Reporting & Taxes	All Accounting, Financial Reporting & Taxes indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio, except for: (1) indirect costs incurred for services associated with proprietary trading activities, which will be allocated based on the Joint Operating Agreement Peak Hour Megawatt Load Ratio, provided, however, that indirect costs provided jointly for both generation trading activities and proprietary trading activities will be allocated based on the Joint Operating Agreement Labor Hours Ratio.
Payment & Reporting	Payment & Reporting indirect costs will be allocated to the Operating Companies based on the Invoice Transaction Ratio.
Receipts Processing	Receipts Processing indirect costs will be allocated based on the Customer Bills Ratio.
Payroll	Payroll indirect costs will be allocated based on the Employee Ratio.

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Rates & Regulation	Rates & Regulation indirect costs will be allocated to the Operating Companies based on the Direct Labor Ratio.
Energy Supply Engineering and Environmental	Energy Supply Engineering and Environmental services will be direct charged and administrative support functions that cannot be direct charged are allocated using a Total Plant Ratio.
Energy Supply Business Resources	Energy Supply Business Resources indirect costs will be allocated using the MWh Generation Ratio.
Energy Markets Regulated Trading & Marketing	Energy Markets Regulated Trading & Marketing indirect costs will be allocated to the Operating Companies based on the Total MWh Sales Ratio, except for: (1) indirect costs incurred for services associated with proprietary trading activities, which will be allocated based on the Joint Operating Agreement Peak Hour Megawatt Load Ratio, provided, however, that indirect costs provided jointly for both generation trading activities and proprietary trading activities will be allocated based on the Joint Operating Agreement Labor Hours Ratio.
Energy Markets - Fuel Procurement	Energy Markets Fuel Procurement indirect costs will be allocated based on the MWh Generation Ratio.
Energy Delivery Marketing	Energy Delivery Marketing will be direct charged.
Energy Delivery Construction, Operations & Maintenance (COM)	Energy Delivery COM indirect costs will be allocated based on the Delivery Services Gross Plant Ratio.
Energy Delivery Engineering/Design	Energy Delivery Engineering/Design services will be direct charged; administrative support functions that cannot be direct charged will be allocated using a Delivery Services Gross Plant Ratio based on the services being provided.
Marketing & Sales	Marketing & Sales indirect costs will be allocated based on the Revenue Ratio.
Customer Service	Customer Service indirect costs will be allocated based on the Customers Ratio. Indirect costs associated with administering low income and certified medical customer assistance programs will be allocated based on a composite of the Average of the Special Needs Customer Contacts Ratio and residential Customers Ratio.
Business Systems	Business Systems indirect costs will be allocated using any of the allocation ratios or combination of ratios.
Aviation Services	Aviation Services will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.

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Fleet	Fleet will be direct charged.
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* Corporate Governance activities within this Service Function will be allocated using the average of the Revenue Ratio with intercompany dividends assigned to Xcel Energy Inc., Employee Ratio with number of common officers assigned to Xcel Energy Inc., and the Total Assets Ratio including Xcel Energy Inc.'s per book assets.

Allocation Ratios

The following ratios will be utilized as outlined above.

Revenue Ratio - Based on the sum of the monthly revenue amounts for the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Revenue Ratio with intercompany dividends assigned to Xcel Energy Inc.

- Based on the sum of the monthly revenue amounts for the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. Xcel Energy Inc. will be assigned the amount of intercompany dividends. This ratio will be determined annually, or at such time as may be required due to significant changes.

Employee Ratio - Based on the number of employees at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such time as may be required due to significant changes

Employee Ratio with number of common officers assigned to Xcel Energy Inc. - Based on the number of employees at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. Xcel Energy Inc. will be assigned the number of common officers. This ratio will be determined annually, or at such time as may be required due to significant changes.

Total Assets Ratio - Based on the total assets as of December 31 for the prior year, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Total Assets Ratio including Xcel Energy Inc's Per Book Assets - Based on the total assets as of December 31 for the prior year, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. Xcel Energy Inc. will be assigned the per book assets of Xcel Energy Inc. This ratio will be determined annually, or at such time as may be required due to significant changes.

Square Footage Ratio - Based on the total square footage as of December 31 for the prior year, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Invoice Transaction Ratio - Based on the sum of the monthly number of invoice transactions processed for the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually or at such time as may be required due to significant changes.

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Customer Bills Ratio - Based on the average of the monthly total number of customer bills issued during the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

MWh Generation Ratio - Based on the sum of the monthly electric MWh generated by type of generator during the prior year ending December 31, the numerator of which is for an applicable Operating Company and the denominator of which is for all applicable Operating Companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Total MWh Sales Ratio - Based on the sum of the monthly electric MWh hours sold during the prior year ending December 31, the numerator of which is for an applicable Operating Company and the denominator of which is for all applicable Operating Companies. This includes sales to ultimate customers, wholesale customers, and non-requirement sales for resale. This ratio will be determined annually, or at such time as may be required due to significant changes.

Customers Ratio - Based on the average of the monthly total electric customers (and/or gas customers, or residential, business and large commercial and industrial customers where applicable) for the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Delivery Services Gross Plant Ratio - Based on transmission and distribution gross plant for the Delivery Business unit, both electric and gas or as may be applicable Electric Distribution for the prior year ending December 31, the numerator of which is an applicable Operating Company and the denominator of which is for all applicable Operating Companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Provided, however, as follows:

- (1) If the costs being allocated are directly related only to electric transmission, the ratio shall be based on the electric transmission gross plant;
- (2) If the costs being allocated are directly related only to electric distribution, the ratio shall be based on the electric distribution gross plant;
- (3) If the costs being allocated are directly related only to gas transmission, the ratio shall be based on the gas transmission gross plant;
- (4) If the costs being allocated are directly related only to gas distribution, the ratio shall be based on the gas distribution gross plant;
- (5) If the costs being allocated are directly related only to electric transmission and electric distribution, the ratio shall be based on the sum of the electric transmission gross plant and the electric distribution gross plant;
- (6) If the costs being allocated are directly related only to electric transmission and gas transmission, the ratio shall be based on the sum of the electric transmission gross plant and the gas transmission gross plant;
- (7) If the costs being allocated are directly related only to electric transmission and gas distribution, the ratio shall be based on the sum of the electric transmission gross plant and the gas distribution gross plant;
- (8) If the costs being allocated are directly related only to electric distribution and gas transmission, the ratio shall be based on the sum of the electric distribution gross plant and the gas transmission gross plant;
- (9) If the costs being allocated are directly related only to electric distribution and gas distribution, the ratio shall be based on the sum of the electric distribution gross plant and the gas distribution gross plant;
- (10) If the costs being allocated are directly related only to gas transmission and gas distribution, the ratio shall be based on the sum of the gas transmission gross plant and the gas distribution gross plant;
- (11) If the costs being allocated are directly related only to electric transmission, electric distribution, and gas transmission, the ratio shall be based on the sum of the electric transmission gross plant, the electric distribution gross plant, and the gas transmission gross plant;
- (12) If the costs being allocated are directly related only to electric transmission, electric distribution, and gas distribution, the ratio shall be based on the sum of the electric transmission gross plant, the electric distribution gross plant, and the gas distribution gross plant;

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(13) If the costs being allocated are directly related only to electric transmission, gas transmission, and gas distribution, the ratio shall be based on the sum of the electric transmission gross plant, the gas transmission gross plant, and the gas distribution gross plant;

(14) If the costs being allocated are directly related only to electric distribution, gas transmission, and gas distribution, the ratio shall be based on the sum of the electric distribution plant, the gas transmission gross plant, and the gas distribution gross plant.

Meters Ratio - Based on the number of meters at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Customer Contacts Ratio - Based on the total annual number of customer contacts at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

If the costs being allocated are directly related only to the support of special needs customers, such as those receiving low income energy assistance program and those having certified medical conditions, the Special Needs Customer Contacts Ratio shall be used.

Special Needs Customer Contacts Ratio - Based on the number of contacts received by the special needs customer department at the end of the prior year ending December 31. The numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. The ratio will be determined annually, or at such a time as may be required due to significant changes.

Accounts Payable Transactions Ratio - Based on the total annual number of accounts payable transactions by system application at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Inventory Transactions Ratio - Based on the total annual number of inventory transactions by system application at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Work Management Transactions Ratio - Based on the total annual number of work management transactions by system application at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Purchasing Transactions Ratio - Based on the total annual number of purchasing transactions by system application at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Total Plant Ratio - Based on total property, plant and equipment at the end of the prior year ending December 31, the numerator of which is an applicable Operating Company and the denominator of which is for all applicable Operating Companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Provided, however, as follows:

(1) If the costs being allocated are directly related only to electric production, the ratio shall be based on the total electric production plant;

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- (2) If the costs being allocated are directly related only to electric transmission, the ratio shall be based on the total electric transmission plant;
- (3) If the costs being allocated are directly related only to electric distribution, the ratio shall be based on the total electric distribution plant;
- (4) If the costs being allocated are directly related only to gas transmission, the ratio shall be based on the total gas transmission plant;
- (5) If the costs being allocated are directly related only to gas distribution, the ratio shall be based on the total gas distribution plant;
- (6) If the costs being allocated are directly related only to intangible plant, the ratio shall be based on the total intangible plant;
- (7) If the costs being allocated are directly related only to electric production and electric transmission, the ratio shall be based on the sum of the total electric production plant and the total electric transmission plant;
- (8) If the costs being allocated are directly related only to electric production and electric distribution, the ratio shall be based on the sum of the total electric production plant and the total electric distribution plant;
- (9) If the costs being allocated are directly related only to electric production and gas transmission, the ratio shall be based on the sum of the total electric production plant and the total gas transmission plant;
- (10) If the costs being allocated are directly related only to electric production and gas distribution, the ratio shall be based on the sum of the total electric production plant and the total gas distribution plant;
- (11) If the costs being allocated are directly related only to electric production and intangible plant, the ratio shall be based on the sum of the total electric production plant and the total intangible plant;
- (12) If the costs being allocated are directly related only to electric transmission and electric distribution, the ratio shall be based on the sum of the total electric transmission plant and the total electric distribution plant;
- (13) If the costs being allocated are directly related only to electric transmission and gas transmission, the ratio shall be based on the sum of the total electric transmission plant and the total gas transmission plant;
- (14) If the costs being allocated are directly related only to electric transmission and gas distribution, the ratio shall be based on the sum of the total electric transmission plant and the total gas distribution plant;
- (15) If the costs being allocated are directly related only to electric transmission and intangible plant, the ratio shall be based on the sum of the total electric transmission plant and the total intangible plant;
- (16) If the costs being allocated are directly related only to electric distribution and gas transmission, the ratio shall be based on the sum of the total electric distribution plant and the total gas transmission plant;
- (17) If the costs being allocated are directly related only to electric distribution and gas distribution, the ratio shall be based on the sum of the total electric distribution plant and the total gas distribution plant;
- (18) If the costs being allocated are directly related only to electric distribution and intangible plant, the ratio shall be based on the sum of the total electric distribution plant and the total intangible plant;
- (19) If the costs being allocated are directly related only to gas transmission and gas distribution, the ratio shall be based on the sum of the total gas transmission plant and the total gas distribution plant;
- (20) If the costs being allocated are directly related only to gas transmission and intangible plant, the ratio shall be based on the sum of the total gas transmission plant and the total intangible plant;
- (21) If the costs being allocated are directly related only to gas distribution and intangible plant, the ratio shall be based on the sum of the total gas distribution plant and the total intangible plant;
- (22) If the costs being allocated are directly related only to electric production, electric transmission, and electric distribution, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, and the total electric distribution plant;
- (23) If the costs being allocated are directly related only to electric production, electric transmission, and gas transmission, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, and the total gas transmission plant;
- (24) If the costs being allocated are directly related only to electric production, electric transmission, and gas distribution, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, and the total gas distribution plant;
- (25) If the costs being allocated are directly related only to electric production, electric transmission, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, and the total intangible plant;

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- (26) If the costs being allocated are directly related only to electric production, electric distribution, and gas transmission, the ratio shall be based on the sum of the total electric production plant, the total electric distribution plant, and the total gas transmission plant;
- (27) If the costs being allocated are directly related only to electric production, electric distribution, and gas distribution, the ratio shall be based on the sum of the total electric production plant, the total electric distribution plant, and the total gas distribution plant;
- (28) If the costs being allocated are directly related only to electric production, electric distribution, and intangible, the ratio shall be based on the sum of the total electric production plant, the total electric distribution plant, and the total intangible plant;
- (29) If the costs being allocated are directly related only to electric production, gas transmission, and gas distribution, the ratio shall be based on the sum of the total electric production plant, the total gas transmission plant, and the total gas distribution plant;
- (30) If the costs being allocated are directly related only to electric production, gas transmission, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total gas transmission plant, and the total intangible plant;
- (31) If the costs being allocated are directly related only to electric production, gas distribution, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total gas distribution plant, and the total intangible plant;
- (32) If the costs being allocated are directly related only to electric transmission, electric distribution, and gas transmission, the ratio shall be based on the sum of the total electric transmission plant, the total electric distribution plant, and the total gas transmission plant;
- (33) If the costs being allocated are directly related only to electric transmission, electric distribution, and gas distribution, the ratio shall be based on the sum of the total electric transmission plant, the total electric distribution plant, and the total gas distribution plant;
- (34) If the costs being allocated are directly related only to electric transmission, electric distribution, and intangible plant, the ratio shall be based on the sum of the total electric transmission plant, the total electric distribution plant, and the total intangible plant;
- (35) If the costs being allocated are directly related only to electric transmission, gas transmission, and gas distribution, the ratio shall be based on the sum of the total electric transmission plant, the total gas transmission plant, and the total gas distribution plant;
- (36) If the costs being allocated are directly related only to electric transmission, gas transmission, and intangible plant, the ratio shall be based on the sum of the total electric transmission plant, the total gas transmission plant, and the total intangible plant;
- (37) If the costs being allocated are directly related only to electric transmission, gas distribution, and intangible plant, the ratio shall be based on the sum of the total electric transmission plant, the total gas distribution plant, and the total intangible plant;
- (38) If the costs being allocated are directly related only to electric distribution, gas transmission, and intangible plant, the ratio shall be based on the sum of the total electric distribution plant, the total gas transmission plant, and the total intangible plant;
- (39) If the costs being allocated are directly related only to electric distribution, gas distribution, and intangible plant, the ratio shall be based on the sum of the total electric distribution plant, the total gas distribution plant, and the total intangible plant;
- (40) If the costs being allocated are directly related only to electric distribution, gas distribution, and gas transmission, the ratio shall be based on the sum of the total electric distribution plant, the total gas distribution plant, and the total gas transmission plant;
- (41) If the costs being allocated are directly related only to gas transmission, gas distribution, and intangible plant, the ratio shall be based on the sum of the total gas transmission plant, the total gas distribution plant, and the total intangible plant;
- (42) If the costs being allocated are directly related only to electric production, electric transmission, electric distribution, and gas transmission, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, the total electric distribution plant, and the total gas transmission plant;
- (43) If the costs being allocated are directly related only to electric production, electric transmission, electric distribution, and gas distribution, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, the total electric distribution plant, and the total gas distribution plant;
- (44) If the costs being allocated are directly related only to electric production, electric transmission, electric distribution, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, the total electric distribution plant, and the total intangible plant;

Name of Respondent	This Report is: (1) <input checked="" type="checkbox"/> An Original (2) <input type="checkbox"/> A Resubmission	Resubmission Date (Mo, Da, Yr) / /	Year of Report 2018
Schedule XXI - Methods of Allocation			

Total Phones Ratio - Based on the number of phones at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Total Radios Ratio - Based on the number of radios at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Total Computers Ratio - Based on the number of computers at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Total Software Applications Users Ratio - Based on the number of users of a specific software application at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Joint Operating Agreement Peak Hour Megawatt Load Ratio - Based on that certain Joint Operating Agreement among Northern States Power Company, a Minnesota corporation, Northern States Power Company, a Wisconsin corporation, Public Service Company of Colorado, Southwestern Public Service Company, and Xcel Energy Services Inc., as agent, dated as of October 1, 2004, as may be amended from time to time, that designates costs to be allocated based on peak hour of megawatt load for previous year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Joint Operating Agreement Labor Hours Ratio - Based on that certain Joint Operating Agreement among Northern States Power Company, a Minnesota corporation, Northern States Power Company, a Wisconsin corporation, Public Service Company of Colorado, Southwestern Public Service Company, and Xcel Energy Services Inc., as agent, dated as of October 1, 2004, as may be amended from time to time, that designates costs to be allocated based on labor hours at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company and the denominator of which is for all applicable Operating Companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Direct Labor Ratio - Based on fully-loaded direct-charged Rates and Regulation labor dollars to individual operating affiliates by the Rates and Regulation service function. The numerator of which is the fully-loaded direct-charges labor dollars to individual operating affiliates by Rates and Regulation service function and the denominator of which is the total fully-loaded direct charged labor dollars to all affiliates by the Rates and Regulation service function.

SERVICE AGREEMENT

This Service Agreement is made and entered into this 9 day of September, 2016, by and between Southwestern Public Service Company ("Client Company") and Xcel Energy Services Inc. ("Service Company").

WITNESSETH

WHEREAS, Service Company is a subsidiary of Xcel Energy Inc. ("Xcel Energy"), a public utility holding company under the Public Utility Holding Company Act of 2005 ("PUCHA 2005") that has been formed to provide support services for Xcel Energy and its subsidiaries in a manner consistent with applicable regulatory requirements; and

WHEREAS, Client Company is a utility operating company subsidiary of Xcel Energy and an affiliate of Service Company; and

WHEREAS, Service Company and Client Company have entered into this Service Agreement whereby Service Company agrees to provide and Client Company agrees to accept and pay for various services as provided on a cost basis, the Service Company will fairly and equitably allocate costs among all associate companies to which it renders services, including the Client Company.

NOW THEREFORE, in consideration of the premises and the mutual agreements herein contained, the parties to this Service Agreement covenant and agree as follows:

ARTICLE I - SERVICES

Section 1.1 Service Company shall furnish to Client Company, as requested by Client Company, upon the terms and conditions hereinafter set forth, such of the services described in Appendix A hereto, at such times, for such periods and in such manner as Client Company may from time to time request and that Service Company concludes it is able to perform. Service Company shall also provide Client Company with such special services, in addition to those services described in Appendix A hereto, as may be requested by Client Company and that Service Company concludes it is able to perform. In supplying such services, Service Company may arrange, where it deems appropriate, for the services of such experts, consultants, advisers, and other persons with necessary qualifications as are required for or pertinent to the provision of such services.

Section 1.2 Client Company shall take from Service Company such services described in Section 1.1, and such additional general or special services, whether or not now contemplated, as are requested from time to time by Client Company and that Service Company concludes it is able to perform.

Section 1.3 The services described herein or contemplated to be performed hereunder shall be directly assigned or allocated by activity, project, program, work order or other

appropriate basis. Client Company shall have the right from time to time to amend, alter or rescind any activity, project, program or work order provided that (i) any such amendment or alteration that results in a material change in the scope of the services to be performed or equipment to be provided is agreed to by Service Company, (ii) the cost for the services covered by the activity, project, program or work order shall include any expense incurred by Service Company as a direct result of such amendment, alteration or rescission of the activity, project, program or work order, and (iii) no amendment, alteration or rescission of an activity, project, program or work order shall release Client Company from liability for all costs already incurred by or contracted for by Service Company pursuant to the activity, project, program or work order, regardless of whether the services associated with such costs have been completed.

Section 1.4 Service Company shall use its best efforts to maintain a staff trained and experienced in the design, construction, operation, maintenance, management, and general administration of public utility properties.

ARTICLE II - COMPENSATION

Section 2.1 As compensation for the services to be rendered hereunder, Client Company shall pay to Service Company all costs which reasonably can be identified and related to particular services performed by Service Company for or on its behalf. The methods for assigning or allocating Service Company costs to Client Company, as well as to other associate companies, are set forth in Appendix A.

Section 2.2 Service Company shall periodically review the methods of assignment or allocation of costs described in Appendix A. Such methods of assignment or allocation of costs may be modified or changed by Service Company subject to providing Client Company three months advance notice, and subject to any required state regulatory commission and Federal Energy Regulatory Commission ("FERC") approval. SPS shall comply with Texas Public Utility Regulatory Act and Public Utility Commission of Texas requirements, if any, regarding notice or approval, or both, of proposed modification to the methods of assignment or allocation of costs. SPS shall comply with New Mexico Public Utility Act and New Mexico Public Regulation Commission requirements, if any, regarding notice or approval, or both, of proposed modification to the methods of assignment or allocation of costs.

Section 2.3 No change in the organization of Service Company, the type and character of the companies to be serviced, the methods of assigning or allocating costs to associate companies, or in the scope or character of the services to be rendered shall be made unless such change is consistent with any applicable regulatory requirements.

Section 2.4 Service Company charges are billed electronically monthly to Client Company. The electronic details reflect the billing information necessary to identify the costs charged for that month. By the twenty-third (23rd) day of the following month, the Client Company shall remit to Service Company payment for all charges billed to it in the previous month.

Section 2.5 In the event of a dispute between the Operating Company and Service Company regarding a billing methodology and/or amount, representatives from the parties involved along with Service Company Accounting will meet to discuss the issues. If a resolution cannot be reached, the issue will be referred to each party's executive management for final resolution.

Section 2.6 It is the intent of this Service Agreement that the payment for services rendered by Service Company to Client Company under this Service Agreement shall cover all the costs of its doing business (less the costs of services provided to associated companies not a party to this Service Agreement and to other non-associated companies, and credits for any miscellaneous items), including, but not limited to, salaries and wages, office supplies and expenses, outside services employed, contract labor, property insurance, injuries and damages, employee pensions and benefits, miscellaneous general expenses, rents, maintenance of structures and equipment, depreciation and amortization, and compensation for use of capital.

ARTICLE III - TERM

Section 3.1 This Service Agreement shall become effective upon its execution, or, if required, upon receipt of applicable regulatory approval, and shall continue in full force and effect until terminated by Service Company or Client Company, upon not less than one year's prior written notice to the other party. This Service Agreement shall also be subject to termination or modification at any time, without notice, if and to the extent performance under this Service Agreement may conflict with any regulatory requirement of the FERC or state commission applicable to either Service Company or Client Company adopted before or after the effective date of this Service Agreement.

ARTICLE IV - LIMITATION OF LIABILITY AND INDEMNIFICATION

Section 4.1 In performing the services hereunder, Service Company will exercise due care to assure that the services are performed in an appropriate manner, meet the standards and specifications set forth in any applicable request for service and comply with the applicable standards of law and regulation. However, failure to meet these obligations shall in no event subject Service Company to any claims by or liabilities to Client Company other than to reperform the services and be reimbursed at cost for such reperformance. Service Company makes no other warranty with respect to its performance of the services, and Client Company agrees to accept such services without further warranty of any nature.

Section 4.2 To the fullest extent allowed by law, Client Company shall and does hereby indemnify and agree to save harmless and defend Service Company, its agents and employees from liabilities, taxes, losses, obligations, claims, damages, penalties, causes of action, suits, costs and expenses or judgments of any nature, on account of, or resulting from the performance and prosecution of any services performed on behalf of Client Company pursuant to this Agreement, whether or not the same results or allegedly results from the claimed or actual negligence or breach of warranty of, or willful conduct by, Service Company or any of its employees, agents, clients, or contractors or its or their subcontractors or any combination thereof.

ARTICLE V - MISCELLANEOUS

Section 5.1 All accounts and records of Service Company shall be kept in accordance with either the General Rules and Regulations promulgated by the FERC pursuant to the PUHCA 2005, in particular, the Uniform System of Accounts for Subsidiary Service Companies or the Uniform System of Accounts Prescribed for Public Utilities and Licensees subject to the Provisions of the Federal Power Act promulgated by the FERC, as each is in effect from and after the date hereof.

Section 5.2 New direct or indirect subsidiaries of Xcel Energy, which may come into existence after the effective date of this Service Agreement, may become additional client companies of Service Company and subject to a service agreement with Service Company, or an existing client company may wish to obtain additional services from Service Company. Likewise, an existing direct or indirect subsidiary of Xcel Energy may cease to be a client company or cease to take individual services from Service Company. In either event, the parties hereto shall make such changes in the scope and character of the services to be rendered and the method of assigning or allocating costs of such services as specified in Appendix A, subject to the requirements of Section 2.3, as may become necessary to achieve a fair and equitable assignment or allocation of Service Company costs among all associate companies.

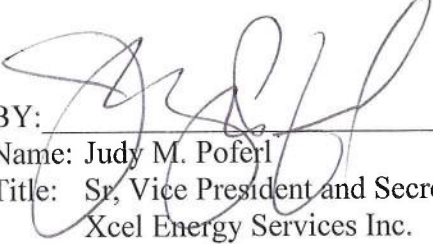
Section 5.3 In the event a Client Company changes the scope of services that it takes from Service Company (pursuant to Section 1.3) or terminates this Service Agreement (pursuant to Section 2.1), the Service Company may bill such Client Company a charge that reflects a proportionate share of any significant residual fixed costs (i.e., incurred costs or commitments to incur costs) that were incurred or committed to incur in contemplation of providing such Client Company service prior to the notice of termination. Examples of fixed costs include, but are not limited to, costs to upgrade computer hardware and software systems to meet Client Company's specifications.

Section 5.4 Service Company shall permit Client Company access to its accounts and records, including the basis and computation of allocations.

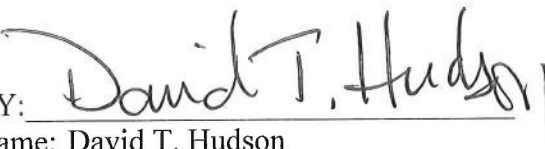
Section 5.5 This Service Agreement supercedes the Service Agreement dated May 28th, 2015.

IN WITNESS WHEREOF, the parties hereto have caused this Service Agreement to be executed as of the date and year first above written.

XCEL ENERGY SERVICES INC.

BY: 
Name: Judy M. Poferi
Title: Sr. Vice President and Secretary
Xcel Energy Services Inc.

SOUTHWESTERN PUBLIC SERVICE COMPANY

BY: 
Name: David T. Hudson
Title: President

Appendix A

DESCRIPTION OF SERVICES TO BE PROVIDED BY XCEL ENERGY SERVICES INC. AND DETERMINATION OF CHARGES FOR SUCH SERVICES TO THE OPERATING COMPANIES AND OTHER AFFILIATES

Description of Services Provided

A description of the services provided by Xcel Energy Services is detailed below. Identifiable costs will be directly assigned to the Operating Companies and other affiliates. For costs that are for services of a general nature and cannot be directly assigned, the method of allocation is described below for each service provided.

*a) Executive Management Services**

Description - Represents charges for Xcel Energy Inc. executive management and services, including, but not limited to, officers of Xcel Energy Inc.

Method of Allocation - Executive Management indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.

*b) Investor Relations**

Description - Provides communications to investors and the financial community. Coordinates the transfer agent and shareholder record keeping functions and plans the annual shareholder meeting.

Method of Allocation - Investor Relations indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.

*c) Internal Audit**

Description - Reviews internal controls and procedures to ensure assets are safeguarded and transactions are properly authorized and recorded. Evaluates contract risks.

Method of Allocation - Internal Audit indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.

*d) Legal**

Description - Provides legal services related to labor and employment law, litigation, contracts, rates and regulation, environmental matters, real estate and other legal matters.

Method of Allocation - Legal indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.

*e) Claims Services**

Description - Provides claims services related to casualty, public and company claims.

Method of Allocation - Claims Services costs will be direct charged. Any costs that cannot be direct charged will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio, and the Total Asset Ratio.

*f) Corporate Communications**

Description - Provides corporate communications, speech writing and coordinates media services. Provides advertising and branding development for the companies within the Xcel Energy Inc. system. Manages and tracks all contributions made on behalf of the Xcel Energy Inc. system.

Method of Allocation - Corporate Communications indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.

*g) Employee Communications**

Description - Develops and distributes communications to employees.

Method of Allocation - Employee Communications indirect costs will be allocated based on the Employee Ratio.

*h) Corporate Strategy & Business Development**

Description - Facilitates development of corporate strategy and prepares strategic plans, monitors corporate performance and evaluates business opportunities. Develops and facilitates process improvements.

Method of Allocation - Corporate Strategy & Business Development indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.

*i) Government Affairs **

Description - Monitors, reviews and researches government legislation.

Method of Allocation - Government Affairs indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.

*j) Facilities & Real Estate**

Description - Operates and maintains office buildings and service centers. Procures real estate and administers real estate leases. Administers contracts to provide security, housekeeping and maintenance services for such facilities. Procures office furniture and equipment.

Method of Allocation - Facilities & Real Estate indirect costs will be allocated to the Operating Companies and Affiliate Companies based on the Employee Ratio.

*k) Facilities Administrative Services**

Description - Includes but is not limited to the functions of Mail Delivery, Duplicating and Records Management.

Method of Allocation - Facilities Administrative Services indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio

*l) Supply Chain**

Description - Includes contract negotiations, development and management of supplier relationships and acquisition of goods and services. Also includes inventory planning and forecasting, ordering, accounting and database management. Warehousing services includes receiving, storing, issuing, shipping, returns, and distribution of material and parts.

Method of Allocation - Supply Chain will be direct charged. Any management and oversight of the payment and reporting services that cannot be direct charged will be allocated using the Invoice Transaction Ratio

*m) Supply Chain Special Programs**

Description - Develops and implements special programs utilized across the company such as procurement cards, travel services, and compliance with corporate MWBE (minority women business expenditures) program goals.

Method of Allocation - Supply Chain Special Programs indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio.

*n) Human Resources**

Description - Establishes and administers policies related to employment, compensation and benefits. Maintains Human Resources computer system, the tuition reimbursement plan, and diversity program. Coordinates the bargaining strategy and labor agreements with union employees. Provides technical and professional development training and general Human Resources support services.

Method of Allocation - Human Resources indirect costs will be allocated based on the Employee Ratio.

*o) Finance & Treasury**

Description - Coordinates activities related to securities issuance, including maintaining relationships with financial institutions, cash management, investing activities and monitoring the capital markets. Performs financial and economic analysis.

Method of Allocation - Finance & Treasury indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio, except for:

(1) indirect costs associated with proprietary trading activities, which will be allocated based on the Joint Operating Agreement Peak Hour Megawatt Load Ratio, provided, however, that indirect costs provided jointly for both generation trading activities and proprietary trading activities will be allocated based on the Joint Operating Agreement Labor Hours Ratio.

*p) Accounting, Financial Reporting & Taxes**

Description - Maintains the books and records. Prepares financial and statistical reports, tax filings and ensures compliance with the applicable laws and regulations. Maintains the accounting systems. Coordinates the budgeting process.

Methods of Allocation – Accounting, Financial Reporting & Taxes indirect costs will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio and the Total Assets Ratio, except for:

(1) indirect costs incurred for services associated with proprietary trading activities, which will be allocated based on the Joint Operating Agreement Peak

Hour Megawatt Load Ratio, provided, however, that indirect costs provided jointly for both generation trading activities and proprietary trading activities will be allocated based on the Joint Operating Agreement Labor Hours Ratio.

*q) Payment & Reporting**

Description - Processes payments to vendors and prepares statistical reports.

Method of Allocation - Payment & Reporting indirect costs will be allocated to the Operating Companies and affiliates based on the Invoice Transaction Ratio.

*r) Receipts Processing**

Description - Processes payments received from customers of the Operating Companies and affiliates.

Method of Allocation - Receipts Processing indirect costs will be allocated based on the Customer Bills Ratio.

*s) Payroll**

Description - Processes payroll including but not limited to time reporting, calculation of salaries and wages, payroll tax reporting and compliance reports.

Method of Allocation - Payroll indirect costs will be allocated based on the Employee Ratio.

*t) Rates & Regulation**

Description - Determines the Operating Companies' regulatory strategy, revenue requirements and rates for electric and gas customers. Coordinates the regulatory compliance requirements and maintains relationships with the regulatory bodies.

Method of Allocation - Rates & Regulation indirect costs will be allocated to the Operating Companies based on the Direct Labor Ratio.

*u) Energy Supply Engineering and Environmental**

Description - Provides engineering services to the generation business. Establishes policies and procedures for compliance with environmental laws and regulations. Researches emerging environmental issues and monitors compliance with environmental requirements. Oversees environmental cleanup projects.

Methods of Allocation - Energy Supply Engineering and Environmental services will be direct charged, and administrative support functions that cannot be direct charged will be allocated using a Total Plant Ratio.

v) *Energy Supply Business Resources**

Description - Provides performance, specialists and analytical services to the Operating Companies' generation facilities.

Method of Allocation - Energy Supply Business Resources indirect costs will be allocated using the MWh Generation Ratio.

w) *Energy Markets Regulated Trading & Marketing**

Description - Provides electric trading services to the Operating Companies' electric generation systems including load management, system optimization and resource acquisition.

Methods of Allocation - Energy Markets Regulated Trading & Marketing indirect costs will be allocated to the Operating Companies based on the Total MWh Sales Ratio, except for:

(1) indirect costs incurred for services associated with proprietary trading activities, which will be allocated based on the Joint Operating Agreement Peak Hour Megawatt Load Ratio, provided, however, that indirect costs provided jointly for both generation trading activities and proprietary trading activities will be allocated based on the Joint Operating Agreement Labor Hours Ratio.

x) *Energy Markets - Fuel Procurement**

Description - Purchases fuel for Operating Companies electric generation systems (excluding nuclear).

Method of Allocation - Energy Markets Fuel Procurement indirect costs will be allocated based on the MWh Generation Ratio.

y) *Energy Delivery Marketing**

Description - Develops new business opportunities and markets the products and services for the Delivery Business Unit.

Method of Allocation - Energy Delivery Marketing will be direct charged.

z) *Energy Delivery Construction, Operations & Maintenance (COM)**

Description - Constructs, maintains and operates electric and gas delivery systems.

Method of Allocation - Energy Delivery COM indirect costs will be allocated based on the Delivery Services Gross Plant Ratio.

*aa) Energy Delivery Engineering/Design**

Description - Provides engineering and design services in support of capacity planning, construction, operations and material standards.

Methods of Allocation - Energy Delivery Engineering/Design services will be direct charged; administrative support functions that cannot be direct charged will be allocated using a Delivery Services Gross Plant ratio based on the services being provided.

*bb) Marketing & Sales**

Description - Provides marketing and sales services for the Operating Companies and affiliates for their electric and natural gas customers including strategic planning, segment identification, business analysis, sales planning and customer service.

Method of Allocation - Marketing & Sales indirect costs will be allocated based on the Revenue Ratio.

*cc) Customer Service**

Description - Provides service activities to retail and wholesale customers. These services include meter reading, customer billing, call center and credit and collections.

Method of Allocation - Customer Service indirect costs will be allocated based on the Customers Ratio. Indirect costs associated with administering the low income and certified medical customer assistance programs will be allocated on the composite of the average of the Special Needs Customer Contacts Ratio and Residential Customers Ratio.

*dd) Business Systems**

Description - Provides basic information technology services such as: application management, voice and data network operations and management, customer support services, problem management services, security administration and systems management. In addition, Business Systems acts as a single point of contact for delivery of all information technology services to Xcel Energy Inc. They partner with vendors to ensure the delivery of benchmarking, continuous improvement, and leadership around strategic initiatives and key developments in the marketplace.

Methods of Allocation - Business Systems indirect costs will be allocated using any of the allocation ratios or combination of ratios.

*ee) Aviation Services**

Description - Provides aviation and travel services to employees.

Method of Allocation - Aviation Services will be allocated based on a three-factor formula that is comprised of the average of the Revenue Ratio, the Employee Ratio, and the Total Assets Ratio.

*ff) Fleet**

Description - Oversees the Operating Companies' Fleet Services Group.

Method of Allocation - Fleet will be direct charged.

*Corporate Governance activities within this Service Function will be allocated using the average of the Revenue Ratio with intercompany dividends assigned to Xcel Energy Inc., Employee Ratio with number of common officers assigned to Xcel Energy Inc., and the Total Assets Ratio including Xcel Energy Inc.'s per book assets.

Allocation Ratios

The following ratios will be utilized as outlined above.

Revenue Ratio - Based on the sum of the monthly revenue amounts for the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Revenue Ratio with intercompany dividends assigned to Xcel Energy Inc.

- Based on the sum of the monthly revenue amounts for the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. Xcel Energy Inc. will be assigned the amount of intercompany dividends. This ratio will be determined annually, or at such time as may be required due to significant changes.

Employee Ratio - Based on the number of employees at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such time as may be required due to significant changes

Employee Ratio with number of common officers assigned to Xcel Energy Inc. -

Based on the number of employees at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. Xcel Energy Inc. will be assigned the number of common officers. This ratio will be determined annually, or at such time as may be required due to significant changes.

Total Assets Ratio - Based on the total assets as of December 31 for the prior year, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Total Assets Ratio including Xcel Energy Inc's Per Book Assets - Based on the total assets as of December 31 for the prior year, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. Xcel Energy Inc. will be assigned the per book assets of Xcel Energy Inc. This ratio will be determined annually, or at such time as may be required due to significant changes.

Square Footage Ratio - Based on the total square footage as of December 31 for the prior year, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Invoice Transaction Ratio - Based on the sum of the monthly number of invoice transactions processed for the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually or at such time as may be required due to significant changes.

Customer Bills Ratio - Based on the average of the monthly total number of customer bills issued during the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

MWh Generation Ratio - Based on the sum of the monthly electric MWh generated by type of generator during the prior year ending December 31, the numerator of which is for an applicable Operating Company and the denominator of which is for all applicable Operating Companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Total MWh Sales Ratio - Based on the sum of the monthly electric MWh hours sold during the prior year ending December 31, the numerator of which is for an applicable Operating Company and the denominator of which is for all applicable Operating Companies. This includes sales to ultimate customers, wholesale customers, and non-requirement sales for resale. This ratio will be determined annually, or at such time as may be required due to significant changes.

Customers Ratio - Based on the average of the monthly total electric customers (and/or gas customers, or residential, business and large commercial and industrial customers where applicable) for the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Delivery Services Gross Plant Ratio - Based on transmission and distribution gross plant for the Delivery Business unit, both electric and gas or as may be applicable Electric Distribution for the prior year ending December 31, the numerator of which is an applicable Operating Company and the denominator of which is for all applicable Operating Companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Provided, however, as follows:

- (1) If the costs being allocated are directly related only to electric transmission, the ratio shall be based on the electric transmission gross plant;
- (2) If the costs being allocated are directly related only to electric distribution, the ratio shall be based on the electric distribution gross plant;
- (3) If the costs being allocated are directly related only to gas transmission, the ratio shall be based on the gas transmission gross plant;
- (4) If the costs being allocated are directly related only to gas distribution, the ratio shall be based on the gas distribution gross plant;
- (5) If the costs being allocated are directly related only to electric transmission and electric distribution, the ratio shall be based on the sum of the electric transmission gross plant and the electric distribution gross plant;
- (6) If the costs being allocated are directly related only to electric transmission and gas transmission, the ratio shall be based on the sum of the electric transmission gross plant and the gas transmission gross plant;
- (7) If the costs being allocated are directly related only to electric transmission and gas distribution, the ratio shall be based on the sum of the electric transmission gross plant and the gas distribution gross plant;
- (8) If the costs being allocated are directly related only to electric distribution and gas transmission, the ratio shall be based on the sum of the electric distribution gross plant and the gas transmission gross plant;
- (9) If the costs being allocated are directly related only to electric distribution and gas distribution, the ratio shall be based on the sum of the electric distribution gross plant and the gas distribution gross plant;
- (10) If the costs being allocated are directly related only to gas transmission and gas distribution, the ratio shall be based on the sum of the gas transmission gross plant and the gas distribution gross plant;
- (11) If the costs being allocated are directly related only to electric transmission, electric distribution, and gas transmission, the ratio shall be based on the sum of the electric transmission gross plant, the electric distribution gross plant, and the gas transmission gross plant;
- (12) If the costs being allocated are directly related only to electric transmission, electric distribution, and gas distribution, the ratio shall be based on the sum of the electric transmission gross plant, the electric distribution gross plant, and the gas distribution gross plant;
- (13) If the costs being allocated are directly related only to electric transmission, gas transmission, and gas distribution, the ratio shall be based on the sum of the electric transmission gross plant, the gas transmission gross plant, and the gas distribution gross plant;

(14) If the costs being allocated are directly related only to electric distribution, gas transmission, and gas distribution, the ratio shall be based on the sum of the electric distribution plant, the gas transmission gross plant, and the gas distribution gross plant.

Meters Ratio - Based on the number of meters at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Customer Contacts Ratio - Based on the total annual number of customer contacts at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

If the costs being allocated are directly related only to the support of special needs customers, such as those receiving low income energy assistance program and those having certified medical conditions, the Special Needs Customer Contacts Ratio shall be used.

Special Needs Customer Contacts Ratio - Based on the number of contacts received by the special needs customer department at the end of the prior year ending December 31. The numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. The ratio will be determined annually, or at such a time as may be required due to significant changes.

Accounts Payable Transactions Ratio - Based on the total annual number of accounts payable transactions by system application at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Inventory Transactions Ratio - Based on the total annual number of inventory transactions by system application at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Work Management Transactions Ratio - Based on the total annual number of work management transactions by system application at the end of the prior year

ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Purchasing Transactions Ratio - Based on the total annual number of purchasing transactions by system application at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Total Plant Ratio - Based on total property, plant and equipment at the end of the prior year ending December 31, the numerator of which is an applicable Operating Company and the denominator of which is for all applicable Operating Companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Provided, however, as follows:

- (1) If the costs being allocated are directly related only to electric production, the ratio shall be based on the total electric production plant;
- (2) If the costs being allocated are directly related only to electric transmission, the ratio shall be based on the total electric transmission plant;
- (3) If the costs being allocated are directly related only to electric distribution, the ratio shall be based on the total electric distribution plant;
- (4) If the costs being allocated are directly related only to gas transmission, the ratio shall be based on the total gas transmission plant;
- (5) If the costs being allocated are directly related only to gas distribution, the ratio shall be based on the total gas distribution plant;
- (6) If the costs being allocated are directly related only to intangible plant, the ratio shall be based on the total intangible plant;
- (7) If the costs being allocated are directly related only to electric production and electric transmission, the ratio shall be based on the sum of the total electric production plant and the total electric transmission plant;
- (8) If the costs being allocated are directly related only to electric production and electric distribution, the ratio shall be based on the sum of the total electric production plant and the total electric distribution plant;
- (9) If the costs being allocated are directly related only to electric production and gas transmission, the ratio shall be based on the sum of the total electric production plant and the total gas transmission plant;
- (10) If the costs being allocated are directly related only to electric production and gas distribution, the ratio shall be based on the sum of the total electric production plant and the total gas distribution plant;
- (11) If the costs being allocated are directly related only to electric production and intangible plant, the ratio shall be based on the sum of the total electric production plant and the total intangible plant;

- (12) If the costs being allocated are directly related only to electric transmission and electric distribution, the ratio shall be based on the sum of the total electric transmission plant and the total electric distribution plant;
- (13) If the costs being allocated are directly related only to electric transmission and gas transmission, the ratio shall be based on the sum of the total electric transmission plant and the total gas transmission plant;
- (14) If the costs being allocated are directly related only to electric transmission and gas distribution, the ratio shall be based on the sum of the total electric transmission plant and the total gas distribution plant;
- (15) If the costs being allocated are directly related only to electric transmission and intangible plant, the ratio shall be based on the sum of the total electric transmission plant and the total intangible plant;
- (16) If the costs being allocated are directly related only to electric distribution and gas transmission, the ratio shall be based on the sum of the total electric distribution plant and the total gas transmission plant;
- (17) If the costs being allocated are directly related only to electric distribution and gas distribution, the ratio shall be based on the sum of the total electric distribution plant and the total gas distribution plant;
- (18) If the costs being allocated are directly related only to electric distribution and intangible plant, the ratio shall be based on the sum of the total electric distribution plant and the total intangible plant;
- (19) If the costs being allocated are directly related only to gas transmission and gas distribution, the ratio shall be based on the sum of the total gas transmission plant and the total gas distribution plant;
- (20) If the costs being allocated are directly related only to gas transmission and intangible plant, the ratio shall be based on the sum of the total gas transmission plant and the total intangible plant;
- (21) If the costs being allocated are directly related only to gas distribution and intangible plant, the ratio shall be based on the sum of the total gas distribution plant and the total intangible plant;
- (22) If the costs being allocated are directly related only to electric production, electric transmission, and electric distribution, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, and the total electric distribution plant;
- (23) If the costs being allocated are directly related only to electric production, electric transmission, and gas transmission, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, and the total gas transmission plant;
- (24) If the costs being allocated are directly related only to electric production, electric transmission, and gas distribution, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, and the total gas distribution plant;
- (25) If the costs being allocated are directly related only to electric production, electric transmission, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, and the total intangible plant;

(26) If the costs being allocated are directly related only to electric production, electric distribution, and gas transmission, the ratio shall be based on the sum of the total electric production plant, the total electric distribution plant, and the total gas transmission plant;

(27) If the costs being allocated are directly related only to electric production, electric distribution, and gas distribution, the ratio shall be based on the sum of the total electric production plant, the total electric distribution plant, and the total gas distribution plant;

(28) If the costs being allocated are directly related only to electric production, electric distribution, and intangible, the ratio shall be based on the sum of the total electric production plant, the total electric distribution plant, and the total intangible plant;

(29) If the costs being allocated are directly related only to electric production, gas transmission, and gas distribution, the ratio shall be based on the sum of the total electric production plant, the total gas transmission plant, and the total gas distribution plant;

(30) If the costs being allocated are directly related only to electric production, gas transmission, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total gas transmission plant, and the total intangible plant;

(31) If the costs being allocated are directly related only to electric production, gas distribution, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total gas distribution plant, and the total intangible plant;

(32) If the costs being allocated are directly related only to electric transmission, electric distribution, and gas transmission, the ratio shall be based on the sum of the total electric transmission plant, the total electric distribution plant, and the total gas transmission plant;

(33) If the costs being allocated are directly related only to electric transmission, electric distribution, and gas distribution, the ratio shall be based on the sum of the total electric transmission plant, the total electric distribution plant, and the total gas distribution plant;

(34) If the costs being allocated are directly related only to electric transmission, electric distribution, and intangible plant, the ratio shall be based on the sum of the total electric transmission plant, the total electric distribution plant, and the total intangible plant;

(35) If the costs being allocated are directly related only to electric transmission, gas transmission, and gas distribution, the ratio shall be based on the sum of the total electric transmission plant, the total gas transmission plant, and the total gas distribution plant;

(36) If the costs being allocated are directly related only to electric transmission, gas transmission, and intangible plant, the ratio shall be based on the sum of the total electric transmission plant, the total gas transmission plant, and the total intangible plant;

(37) If the costs being allocated are directly related only to electric transmission, gas distribution, and intangible plant, the ratio shall be based on the sum of the

total electric transmission plant, the total gas distribution plant, and the total intangible plant;

(38) If the costs being allocated are directly related only to electric distribution, gas transmission, and intangible plant, the ratio shall be based on the sum of the total electric distribution plant, the total gas transmission plant, and the total intangible plant;

(39) If the costs being allocated are directly related only to electric distribution, gas distribution, and intangible plant, the ratio shall be based on the sum of the total electric distribution plant, the total gas distribution plant, and the total intangible plant;

(40) If the costs being allocated are directly related only to electric distribution, gas distribution, and gas transmission, the ratio shall be based on the sum of the total electric distribution plant, the total gas distribution plant, and the total gas transmission plant;

(41) If the costs being allocated are directly related only to gas transmission, gas distribution, and intangible plant, the ratio shall be based on the sum of the total gas transmission plant, the total gas distribution plant, and the total intangible plant;

(42) If the costs being allocated are directly related only to electric production, electric transmission, electric distribution, and gas transmission, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, the total electric distribution plant, and the total gas transmission plant;

(43) If the costs being allocated are directly related only to electric production, electric transmission, electric distribution, and gas distribution, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, the total electric distribution plant, and the total gas distribution plant;

(44) If the costs being allocated are directly related only to electric production, electric transmission, electric distribution, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, the total electric distribution plant, and the total intangible plant;

(45) If the costs being allocated are directly related only to electric production, electric transmission, gas transmission, and gas distribution, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, the total gas transmission plant, and the total gas distribution plant;

(46) If the costs being allocated are directly related only to electric production, electric transmission, gas transmission, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, the total gas transmission plant, and the total intangible plant;

(47) If the costs being allocated are directly related only to electric production, electric distribution, gas transmission, and gas distribution, the ratio shall be based on the sum of the total electric production plant, the total electric distribution plant, the total gas transmission plant, and the total gas distribution plant;

- (48) If the costs being allocated are directly related only to electric production, electric distribution, gas transmission, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total electric distribution plant, the total gas transmission plant, and the total intangible plant;
- (49) If the costs being allocated are directly related only to electric production, electric distribution, gas distribution, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total electric distribution plant, the total gas distribution plant, and the total intangible plant;
- (50) If the costs being allocated are directly related only to electric production, gas transmission, gas distribution, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total gas transmission plant, the total gas distribution plant, and the total intangible plant;
- (51) If the costs being allocated are directly related only to electric transmission, electric distribution, gas transmission, and gas distribution, the ratio shall be based on the sum of the total electric transmission plant, the total electric distribution plant, the total gas transmission plant, and the total gas distribution plant;
- (52) If the costs being allocated are directly related only to electric transmission, electric distribution, gas transmission, and intangible plant, the ratio shall be based on the sum of the total electric transmission plant, the total electric distribution plant, the total gas transmission plant, and the total intangible plant;
- (53) If the costs being allocated are directly related only to electric transmission, electric distribution, gas distribution, and intangible plant, the ratio shall be based on the sum of the total electric transmission plant, the total electric distribution plant, the total gas distribution plant, and the total intangible plant;
- (54) If the costs being allocated are directly related only to electric transmission, gas transmission, gas distribution, and intangible plant, the ratio shall be based on the sum of the total electric transmission plant, the total gas transmission plant, the total gas distribution plant, and the total intangible plant;
- (55) If the costs being allocated are directly related only to electric distribution, gas transmission, gas distribution, and intangible plant, the ratio shall be based on the sum of the total electric distribution plant, the total gas transmission plant, the total gas distribution plant, and the total intangible plant;
- (56) If the costs being allocated are directly related only to electric production, electric transmission, gas distribution, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, the total gas distribution plant, and the total intangible plant;
- (57) If the costs being allocated are directly related only to electric production, electric transmission, electric distribution, gas distribution, and gas transmission, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, the total electric distribution plant, the total gas distribution plant, and the total gas transmission plant;
- (58) If the costs being allocated are directly related only to electric production, electric transmission, electric distribution, gas transmission, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, the total electric distribution plant, the total gas transmission plant, and the total intangible plant;

(59) If the costs being allocated are directly related only to electric production, electric distribution, gas distribution, gas transmission, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total electric distribution plant, the total gas distribution plant, the total gas transmission plant, and the total intangible plant;

(60) If the costs being allocated are directly related only to electric production, electric transmission, gas distribution, gas transmission, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, the total gas distribution plant, the total gas transmission plant, and the total intangible plant;

(61) If the costs being allocated are directly related only to electric production, electric transmission, electric distribution, gas distribution, and intangible plant, the ratio shall be based on the sum of the total electric production plant, the total electric transmission plant, the total electric distribution plant, the total gas distribution plant, and the total intangible plant;

(62) If the costs being allocated are directly related only to electric transmission, electric distribution, gas distribution, gas transmission, and intangible plant, the ratio shall be based on the sum of the total electric transmission plant, the total electric distribution plant, the total gas distribution plant, the total gas transmission plant, and the total intangible plant.

Total Phones Ratio - Based on the number of phones at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Total Radios Ratio - Based on the number of radios at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Total Computers Ratio - Based on the number of computers at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Total Software Applications Users Ratio - Based on the number of users of a specific software application at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such a time as may be required due to significant changes.

Joint Operating Agreement Peak Hour Megawatt Load Ratio - Based on that certain Joint Operating Agreement among Northern States Power Company, a Minnesota corporation, Northern States Power Company, a Wisconsin corporation, Public Service Company of Colorado, Southwestern Public Service Company, and Xcel Energy Services Inc., as agent, dated as of October 1, 2004, as may be amended from time to time, that designates costs to be allocated based on peak hour of megawatt load for previous year ending December 31, the numerator of which is for an applicable Operating Company or affiliate company and the denominator of which is for all applicable Operating Companies and affiliate companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Joint Operating Agreement Labor Hours Ratio - Based on that certain Joint Operating Agreement among Northern States Power Company, a Minnesota corporation, Northern States Power Company, a Wisconsin corporation, Public Service Company of Colorado, Southwestern Public Service Company, and Xcel Energy Services Inc., as agent, dated as of October 1, 2004, as may be amended from time to time, that designates costs to be allocated based on labor hours at the end of the prior year ending December 31, the numerator of which is for an applicable Operating Company and the denominator of which is for all applicable Operating Companies. This ratio will be determined annually, or at such time as may be required due to significant changes.

Direct Labor Ratio – Based on fully-loaded direct-charged Rates and Regulation labor dollars to individual operating affiliates by the Rates and Regulation service function. The numerator of which is the fully-loaded direct-charges labor dollars to individual operating affiliates by Rates and Regulation service function and the denominator of which is the total fully-loaded direct charged labor dollars to all affiliates by the Rates and Regulation service function.

Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200063	Executive - Corporate Governance	Executive Corporate Governance includes the labor and non-labor costs for executive corporate management, long-term business strategy development and other programs that ensure the continuity and development of management. Corporate governance activities are generally services that are performed on behalf of all Xcel Energy operating companies and affiliates, including Xcel Energy Inc.	Three-factor formula (assets, revenues, number of employees)
200064	Shareholder - Corporate Governance	Shareholder - Corporate Governance includes the labor and non-labor costs for serving as liaison between Xcel Energy BOD and the shareholders, manages employee/executive stock award matters, liaison between Xcel Energy and the proxy advisory group, monitoring stock ownership patterns, planning shareholder meetings, coordinating the transfer agent and shareholder record keeping functions. Corporate governance activities are generally services that are performed on behalf of all Xcel Energy operating companies and affiliates, including Xcel Energy Inc.	Three-factor formula (assets, revenues, number of employees)
200065	Investor Relations - Corporate Governance	Investor Relations - Corporate Governance includes the labor and non-labor costs for communications to investors and the financial community, providing management with feedback from investors, assisting in the communication to investors of debt and equity securities issuances, assists in the development of presentations for Board of Directors, develops and delivers Xcel Energy's credit story to credit rating agencies, develops and presents Xcel Energy's investment story to investors, reviews all public financial documents for accuracy and completeness and distributes all financial releases. Corporate governance activities are generally services that are performed on behalf of all Xcel Energy operating companies and affiliates, including Xcel Energy Inc.	Three-factor formula (assets, revenues, number of employees)
200066	Accounting & Reporting - Corporate Governance	Accounting & Reporting - Corporate Governance includes the labor and non-labor costs associated with preparing and filing consolidated reporting and financial statements, preparing consolidated budgets, completing the consolidation process, maintaining the books and records of Xcel Energy Inc. and Service Company, composing the corporate-wide regulatory accounting policy and compliance, Sarbanes-Oxley (SOX) documentation and compliance, and Chief Financial Officer activities related to the Audit Committee. Provides financial leadership to Xcel Energy and provides policies, controls, and leadership to the Financial Operations business area. Corporate governance activities are generally services that are performed on behalf of all Xcel Energy operating companies and affiliates, including Xcel Energy Inc.	Three-factor formula (assets, revenues, number of employees)

Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200067	Audit Services - Corporate Governance	<p>Audit Services corporate governance includes the labor and non-labor costs associated with the financial operations and information system audits of the holding company and service company; evaluating and improving risk management, corporate internal control guidelines and procedures; ethical conduct and the implementation of best practices, reviewing financial reporting requirements and controls under Sarbanes-Oxley legislative requirements, auditing of consolidated financial statements and activities related to the Audit Committee, performing audits and reviews for compliance with regulatory and legal requirements on contracts with vendors and other parties, providing consulting services to management for operational and process improvement reviews, assistance in internal investigations of fraud, administering the corporate compliance hotline, conflict of interest investigations, or other potential violations of the Xcel Energy Code of Conduct. Corporate governance activities are generally services that are performed on behalf of all Xcel Energy operating companies and affiliates, including Xcel Energy Inc.</p>	<p>Three-factor formula (assets, revenues, number of employees)</p>
200068	Finance & Treasury - Corporate Governance	<p>Finance & Treasury - Corporate Governance includes the labor and non-labor costs related to equity and debt securities issuance, relationships with financial institutions, cash management, investing activities and monitoring the capital markets, holding company commercial paper transactions, compliance with debt covenants, corporate-wide protection of assets from catastrophic loss using risk financing mechanisms including captive risk retention and design and negotiation of insurance contracts with commercial and industry mutual underwriters (Service Company portion of Auto Liability, Cyber, and various other insurance policies), supervising the asset management firms for the Pension Fund and 401k benefits. Corporate governance activities are generally services that are performed on behalf of all Xcel Energy operating companies and affiliates, including Xcel Energy Inc.</p>	<p>Three-factor formula (assets, revenues, number of employees)</p>
200069	Risk Management - Corporate Governance	<p>Risk Management Corporate Governance includes the labor and non-labor costs of providing administration of the Transaction Review Committee which handles contract and deal approvals for Commercial Operations, Resource Planning and Energy Supply, provides analysis associated with key risks facing Xcel Energy Inc., negotiates and manages required security (e.g., bank letters of credit, bonds and guarantees among others); reviews and approves all documents requiring Contracts area sign-off. Corporate governance activities are generally services that are performed on behalf of all Xcel Energy operating companies and affiliates, including Xcel Energy Inc.</p>	<p>Three-factor formula (assets, revenues, number of employees)</p>
200070	Corporate Strategy & Business Development - Corporate Governance	<p>Corporate Strategy & Business Development - Corporate Governance includes the labor and non-labor costs associated with providing leadership for the implementation of company-wide business strategies and plans; portfolio management including the evaluation of potential opportunities for mergers, acquisitions and divestitures; providing financial, analytical and reporting support; researching and providing business intelligence information. Corporate governance activities are generally services that are performed on behalf of all Xcel Energy operating companies and affiliates, including Xcel Energy Inc.</p>	<p>Three-factor formula (assets, revenues, number of employees)</p>

Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200071	Legal - Corporate Governance	Legal services Corporate Governance includes the labor and non-labor costs for anticipating and fulfilling the legal needs of Xcel Energy, its Board of Directors, officers, legal entities, business areas and corporate operations to protect the company's assets and to minimize potential liability. Provides services related to labor and employment law pertaining to Service Company employees, litigation, contracts, rates and regulation, environmental matters and other legal matters. Supports Xcel Energy and its subsidiaries in fulfilling corporate and business area strategies ranging from maintaining/improving regulatory relationships to continued leadership on environmental issues. Corporate governance activities are generally services that are performed on behalf of all Xcel Energy operating companies and affiliates, including Xcel Energy Inc.	Three-factor formula (assets, revenues, number of employees)
200072	Communications - Corporate Governance	Communications - Corporate Governance includes the labor and non-labor costs to assist and ensure Executive Management, Investor Relations and others communicate appropriately with shareholders, the public, and other key stakeholder audiences. Key projects include: development and production of the annual report and other communications to investors; speeches, videos, and major presentations delivered by top executives; and speeches, displays, video and presentations for the company's annual meeting of shareholders. Media Relations contributes to building Xcel Energy's reputation by developing media and public relations strategies for major company initiatives and issues; responding to news media inquiries; working pro-actively with the media to forward story ideas and information about company events, policies and actions, and providing media training for company spokespersons. Media Relations also plays a key role in crisis communications and emergency preparedness efforts. Corporate governance activities are generally services that are performed on behalf of all Xcel Energy operating companies and affiliates, including Xcel Energy Inc.	Three-factor formula (assets, revenues, number of employees)
200073	Human Resources (HR) - Corporate Governance	Human Resources-Corporate Governance includes the labor and non-labor costs for executive officers' and Service Company employees' compensation plans, corporate HR policies, executive policy benefit plans, payroll services for Service Company and the employees' handbook. Corporate governance activities are generally services that are performed on behalf of all Xcel Energy operating companies and affiliates, including Xcel Energy Inc.	Three-factor formula (assets, revenues, number of employees)
200074	Corporate Systems - Corporate Governance	Corporate Systems - Corporate Governance includes the labor and non-labor costs for the non-critical corporate systems.	Three-factor formula (assets, revenues, number of employees)
200075	Board of Directors - Corporate Governance	Board of Directors - Corporate Governance includes the labor and non-labor costs related to the Board of Directors (BOD). BOD costs may include Directors fees, retirement expenses and replacement fees; Board/Committee meetings and BOD related consulting. Corporate governance activities are generally services that are performed on behalf of all Xcel Energy operating companies and affiliates, including Xcel Energy Inc.	Three-factor formula (assets, revenues, number of employees)

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Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200076	Xcel Foundation	Xcel Foundation services includes the labor and non-labor costs associated with the management and administration of the Xcel Energy Foundation.	Three-factor formula (assets, revenues, number of employees)
200077	Branding	Branding services includes the labor and non-labor costs for brand advertising and management of community affairs programs such as employee volunteerism, educational programs and community events, the company's investment in major sponsorships such as the Xcel Energy Center as well as ensuring that such sponsorships and related activities support the company's brand, mission and values.	Three-factor formula (assets, revenues, number of employees)
200078	Governmental Affairs	Governmental Affairs includes the labor and non-labor costs associated with the interpretation of laws regulations and environmental policy to ensure compliance and cost effectiveness for Xcel Energy customers and stockholders Internal legislative policy development and issues management, appraise management and internal customers of political and policy trends and developments, develop and maintain relationships with regulatory officials and staff.	Three-factor formula (assets, revenues, number of employees)
200079	Federal Lobbying	Federal Lobbying services includes the labor and non-labor costs for federal and state lobbying activities and the federal Political Action Committee (PAC).	Three-factor formula (assets, revenues, number of employees)
200080	Capital Asset Accounting	Capital Asset Acctg includes the labor and non-labor costs associated with operating and non-operating company capital asset accounting, budgeting, regulatory reporting, business area support for utility areas, and operating company budgeting support.	Three-factor formula (assets, revenues, number of employees)
200081	Accounting, Reporting, & Taxes	Accounting, Reporting & Taxes services includes the labor and non-labor costs for preparation of operating and non-operating financial statements, tax returns and reporting, performing accounting for the employee benefit plans, ensuring compliance with applicable laws and regulations of the operating and non-operating companies; composing the corporate-wide regulatory accounting policy, and coordinating the budgeting process with the operating and non-operating companies.	Three-factor formula (assets, revenues, number of employees)
200082	Audit Services	Audit Services includes the labor and non-labor costs for auditing operating and non-operating companies, evaluating and improving risk management, ethical conduct and the implementation of best practices for operating and non-operating companies, conducting financial operations and information system audits, performing audits and reviews for compliance with regulatory and legal requirements and contracts with vendors and other parties; establishing and reviewing internal controls for operating and non-operating companies, establishing and reviewing SOX compliance requirements/control testing and evaluating contract risks for the operating and non-operating companies.	Three-factor formula (assets, revenues, number of employees)

Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200083	Finance & Treasury	Finance & Treasury services includes the labor and non-labor costs related to equity and debt securities issuance, cash management, relationships with financial institutions, compliance with debt covenants, Service Company portion of General and Excess liability insurance, and management of the Pension Fund and 401k benefits for operating companies.	Three-factor formula (assets, revenues, number of employees)
200084	Risk Management	Risk Management develops and negotiates security agreements with counterparties; reviews high-risk vendor creditworthiness for the Environmental Services group; supports wind generation, solar carbon offsets, emission allowances, bundled energy and RECs, biomass and other renewable energy purchase agreements; participates in industry contracts working groups; representing Xcel Energy operating utilities; performs production cost modeling and analysis for corporate budgeting; analyzing value and risks of structured purchases and generation system modifications; performs long range system modeling to evaluate large capacity acquisition alternatives; provides central coordination of annual capital funding process for Distribution and maintains and administers the Risk Registry database, evaluates and prioritizes specific risk mitigations for distribution assets; develops strategies for distribution infrastructure including building and implementing stochastic models for asset life-cycle analysis and other ad hoc asset specific requests; creates retail and system load and energy forecasts providing regular updates to senior management and analyses of key drivers; provides data support and analyses for financial disclosures; and provides analyses and reporting of current sales and peak demand levels relative to forecasts.	Three-factor formula (assets, revenues, number of employees)
200086	Legal	Legal services includes the labor and non-labor costs for operating and non-operating legal services related to: labor and employment law, litigation, rates and regulation, environmental matters, real estate and contracts.	Three-factor formula (assets, revenues, number of employees)
200087	Accounting - Operating Companies	Accounting - Operating Companies includes the labor and non-labor costs associated with operating company revenue accounting, budgeting, regulatory reporting, sales and use taxes, business area support for utility areas, operating company budgeting support, and capital asset accounting.	Three-factor formula (assets, revenues, number of employees)
200088	Accounting, Reporting, Tax, Audit Services - OpCos Electric	Accounting, Reporting, Tax, Audit Services - OpCos Elec includes the labor and non-labor costs associated specifically with operating company electric utility revenue accounting, budgeting, regulatory reporting, sales and use taxes, business area support for utility areas, operating company budgeting support, capital asset accounting auditing operating companies, evaluating and improving risk management, ethical conduct and the implementation of best practices for operating companies electric utility, conducting financial operations and information system audits, performing audits and reviews for compliance with regulatory and legal requirements and contracts with vendors and other parties; establishing and reviewing internal controls for operating and companies electric utility, establishing and reviewing SOX compliance requirements/control testing and evaluating contract risks for the operating companies electric utility.	Three-factor formula (assets, revenues, number of employees)

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Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200089	Audit Services - OpCos	Audit Services - OpCos includes the labor and non-labor costs for auditing operating companies, evaluating and improving risk management, ethical conduct and the implementation of best practices for operating companies, conducting financial operations and information system audits, performing audits and reviews for compliance with regulatory and legal requirements and contracts with vendors and other parties; establishing and reviewing internal controls for operating companies, establishing and reviewing SOX compliance requirements/control testing and evaluating contract risks for the operating companies.	Three-factor formula (assets, revenues, number of employees)
200090	Risk Management - OpCos	Risk Mgmt - OpCos includes the labor and non-labor costs of oversight and administrative of operating company risk management work, working with counterparties to establish enabling agreements with operating companies, risk management reports including all operating companies (such as CDAD - Contract Development, Approval & Delegation or TRC- Transaction Review Committee Reporting).	Three-factor formula (assets, revenues, number of employees)
200091	Captive Insurance - OpCos	Captive Insurance - The Property Loss Control Engineers services includes the labor and non-labor costs for each primary Operating Company(s) (OpCos) as well as all of Energy Supply Services. Having an expertise in an area, they lend support to each other and members of Energy Supply, and the Utilities Group, throughout the corporation. Fire Protection, Transformer Maintenance, Turbine Characteristics, Policies and Procedures are some of the areas in which expertise has been developed. This expertise is then shared on a regular basis to the benefit of all OpCos and it is further shared at periodic Engineering meetings hosted by Hazard Insurance, which bring together Engineers from the OpCos, the Property Loss Control Engineers and Insurance Company representatives to promote Loss Control.	Three-factor formula (assets, revenues, number of employees)
200092	Corporate Strategy & Business Development	Corporate Strategy & Business Development - includes the labor and non-labor costs associated with providing leadership for the implementation of company-wide business strategies and plans; portfolio management including the evaluation of potential opportunities for mergers, acquisitions and divestitures; providing financial analytical and reporting support; researching and providing business intelligence information.	Three-factor formula (assets, revenues, number of employees)
200093	Legal - OpCos	Legal - OpCos services includes the labor and non-labor costs for operating companies legal services related to: labor and employment law, litigation, rates and regulation, environmental matters, real estate and contracts.	Three-factor formula (assets, revenues, number of employees)
200094	Supply Chain	Supply Chain includes the labor and non-labor costs for operating companies diversity program expenses as well as various dues for specific sponsored agencies (Chamber of Commerce, social service dues, etc.)	Three-factor formula (assets, revenues, number of employees)

Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200095	Energy Supply Asset Management	Energy Supply Asset Management services includes the labor and non-labor costs of providing management support to the Energy Supply organization, maximizing business value of the Energy Supply information systems, developing the business plan, optimizing plant inventory, and leading the development of asset management strategy and implementation.	Three-factor formula (assets, revenues, number of employees)
200096	Energy Markets - Business Services	Energy Markets Business Services includes the labor and non-labor costs for financial analysis, budgeting and administrative support, managerial reporting and business planning and process initiatives, independent daily forward valuation and risk measurement of commodity transactions and system fuel and purchase power requirements to meet system loads, as well as proprietary or trading transactions; creates retail system load and energy forecasts providing regular updates to senior management and analyses of key drivers, reviews and provides comments to dealmakers on non-standard agreements and associated confirmation agreements in the areas of coal supply, gas supply, wood fuel, rail, trucking, structured power purchases and nuclear/uranium concentrates and services; provides analyses for electric/gas hedge studies and sensitivities; creates load management forecast, jurisdictional peak demand forecasts, and cost of service studies for energy trading and marketing.	Three-factor formula (assets, revenues, number of employees)
200097	Accounting and Finance Software Applications Maintenance	Includes the labor and non-labor operating costs for the application development and maintenance of the software applications used for accounting and finance business functions.	Three-factor formula (assets, revenues, number of employees)
200098	Transm Elec FERC 566	Transm Elec FERC 566 services include transmission electric labor and non-labor costs associated with accounting, budgeting, regulatory reporting, and capital asset accounting.	Three-factor formula (assets, revenues, number of employees)
200099	Elec Dist FERC 588	Elec Dist FERC 588 services include electric distribution labor and non-labor costs associated with accounting, budgeting, regulatory reporting, and capital asset accounting.	Three-factor formula (assets, revenues, number of employees)
200103	Elec Dist FERC 588 South	Elec Dist FERC 588 South services include electric distribution labor and non-labor costs associated with accounting, budgeting, regulatory reporting, and capital asset accounting.	Three-factor formula (assets, revenues, number of employees)
200104	Accounting, Reporting Tax - PSCo, SPS	Accounting, Reporting Tax - PSCo, SPS includes the labor and non-labor costs associated with PSCo & SPS revenue accounting, budgeting, regulatory reporting, sales and use taxes, business area support for utility areas, operating company budgeting support, and capital asset accounting.	Three-factor formula (assets, revenues, number of employees)
200110	Passport - Accounts Payable	Passport - Accounts Payable includes the labor and non-labor costs for only the Accounts Payable module within Passport. This is applicable for when work is only being done on this module. This includes application development and maintenance costs, licensing fees, server system costs and technology risk costs specific to disaster recovery of this application.	Number of Passport Accounts Payable transactions

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Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200111	EAI (Enterprise Application Integration)	EAI (Enterprise Application Integration) includes the labor and non-labor costs associated with the management of information systems infrastructure and working with IT Project Managers to ensure that new systems are positioned to function as successfully as possible in terms of overall performance and communication with other systems.	Average of all software percentages
200112	Mainframe Charges From IBM	Labor and non-labor costs related to Mainframe IBM expenses for development, maintenance, and licensing. The Mainframe is comprised of 3 applications: Time, Gas Management System, and Monitoring Device Management System applications. This is used primarily by the Business Systems Organization.	Average of a Select Set of Software Allocators
200115	Miscellaneous Applications	Miscellaneous Applications includes the labor and non-labor costs associated with the management of information systems infrastructure and working with IT Project Managers to ensure that new systems are positioned to function as successfully as possible in terms of overall performance and communication with other systems.	Average of all software percentages
200116	Distribution Electric FERC 580 (E&S)	Distribution Electric FERC 580 services includes the labor and non-labor costs for the engineering and supervision of the electric distribution organization.	Electric distribution plant
200117	Transmission Electric FERC 586	Distribution Elec FERC 586 services include meter expenses labor and non-labor providing direction, operations, standards and processes relating to Xcel Energy operating companies i.e.: electric distribution meters standards and development, meter purchases, etc. This allocation is used when all four jurisdictions are benefiting from the services.	Electric distribution plant
200118	EMS Distribution - FERC 581	EMS provides supervisory control and data acquisition of substation devices through Remote Terminal Units (RTU's). EMS - Distribution system includes the labor and non-labor costs for application development and maintenance of the Electric Distribution Plant information operations. This is primarily used by the Business Systems organization.	Electric distribution plant
200119	Distribution Software Systems	Distribution Software Systems includes the labor and non-labor costs for the maintenance and support for electric and gas distribution to our customers.	Electric distribution plant/Gas distribution plant
200121	Elec Dist, Gas Dist, & Gas Trans FERC 588, 880, 859	Elec Dist, Gas Dist, & Gas Trans FERC 588, 880, 859 services include gas distribution, gas transmission, and electric distribution labor and non-labor costs associated with accounting, budgeting, and regulatory reporting.	Electric Distribution, Gas Transmission, and Gas Distribution Plant
200122	Transmission Electric FERC 560 (E&S)	Transmission Electric FERC 560 services includes the labor and non-labor costs for engineering and supervision of the electric transmission organization.	Electric transmission plant

Southwest Public Service Company
XES Allocating Cost Center Descriptions

Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200123	Transmission Electric FERC 561.5	Transmission Electric FERC 561.5 services include transmission reliability, planning and standards development labor and non-labor expenses for Xcel Energy Operating Companies related to transmission assets and reliability needs and transmission customers requirements and requests ie: developing and maintaining transmission system models, applying methodologies and tools for analysis and simulation of systems, notification of any planned transmission changes and impacts, etc. This allocation is used when all four jurisdictions are benefiting from the services and processes.	Electric transmission plant
200124	EMS-Transmission (Energy Management System-SCADA)	EMS provides supervisory control and data acquisition of substation devices through Remote Terminal Units (RTU's). EMS -Transmission system includes the labor and non-labor costs for the application development and maintenance of the Electric Transmission Plant information operations.	Electric transmission plant
200126	Utilities Group Administrative & General (A&G) FERC 921	Utilities Group A&G (Administrative and General) FERC 921 services includes the labor and non-labor costs for utilities group leadership, management and support services for the distribution, transmission, transportation and supply chain areas.	Electric/Gas distribution plant and electric/gas transmission plant
200132	Payment and Reporting	Payment & Reporting services includes the labor and non-labor costs associated with processing payments to vendors, providing audit research and reconciliation support for Accounts Payable transactions, preparing statistical and 1099 reporting, and administering the purchase card programs.	Invoice transactions
200133	Proprietary Trading - Back Office	Proprietary Trading - Back Office includes the labor and non-labor costs associated with the accounting support and vice president oversight of proprietary trading activities for Northern States Power Minnesota, Public Service Company of Colorado and Southwestern Public Service Company.	NSPM, PSCo & SPS Proprietary trading dollars are allocated based on the Joint Operating Agreement
200134	Prop Trading - Front/Mid Office	Prop Trading - Frt/Mid Office includes the labor and non-labor costs associated with proprietary trading activities which are short term transactions undertaken in the wholesale electric markets where electricity is purchased for the purpose of selling it. Also included are supporting activities: evaluating the credit worthiness of counterparties, reviewing contracts to ensure that regulations are being complied with, evaluating profitability and appropriateness of trades to ensure they are in the best interest of shareholders and rate payers, and ensuring that trades identified as proprietary appropriately fall into that category.	NSPM, PSCo & SPS Proprietary trading dollars are allocated based on the Joint Operating Agreement
200135	Energy Supply Business Resources	Energy Supply Business Resources services includes the labor and non-labor costs of performance analysis, specialists and analytical services provided to the operating companies' generation facilities.	MWH generation
200136	Energy Markets - Fuel	Energy Markets Fuel includes the labor and non-labor costs for planning and implementing power supply portfolios to provide reliable service to native load and to capitalize on market opportunities including purchasing fuel for the operating companies' electric generation system (excluding nuclear) and resource planning and acquisition including purchase power and account management.	MWH generation

Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200137	Energy Supply Miscellaneous Power Expense OpCo's	Energy Supply Miscellaneous Power Expense OpCo's services include Energy Supply operations performance services labor and non-labor costs for non-management employees with the following accountabilities: Develop / suggest / implement improvements for multiple power plants, standardize best practices and process improvements across multiple power plants, establish operations and maintenance policies and procedures for multiple power plants. This allocation is used when all four jurisdictions are benefiting from the services.	MWH generation
200138	Energy Supply Operations Management OPCo's	Energy Supply Operations Management OPCo's services include management of energy supply operations services labor and non-labor costs for the following accountabilities: Operate plant equipment within requirements, maintain plant equipment, manage plant personnel in accordance with labor contracts, suggest/implement plant improvements, maintain community relationships, establish operations and maintenance policies and procedures and overhaul planning and execution. This allocation is used when all four jurisdictions are benefiting from the services.	MWH generation
200139	ES Engineering and Construction	ES Engineering & Construction OPCo's services which include management and performance labor and non-labor costs for the following accountabilities: Researching, reviewing, recommending and facilitating the selection of technological alternatives for improved plant and environmental performance. Manage uniform project management process (policies). Planning for Physical Plant Modifications, which includes consolidation and management of short-term and long-term plans for physical plant modifications. Develop and execute Innovative Technology Projects such as: Biomass, Solar, Wind. Implement enterprise project management (EPM) and planning tools. Establish uniform technology, design & equipment standards. This allocation is used when NSPM, NSPW, PSCo and SPS jurisdictions are benefiting from the services.	MWH generation
200140	ES Operations Performance	ES Misc Power Expense Op Co's services include Energy Supply operations performance services labor and non-labor costs for non-management employees with the following accountabilities: Develop / suggest / implement improvements for multiple power plants, standardize best practices and process improvements across multiple power plants, establish operations and maintenance policies and procedures for multiple power plants. This allocation is used when PSCo & SPS jurisdictions are benefiting from the services.	MWH generation
200141	ES Operations Management South	ES Operations Management South services include management of energy supply operations services labor and non-labor costs for the following accountabilities: Operate plant equipment within requirements, maintain plant equipment, manage plant personnel in accordance with labor contracts, suggest/implement plant improvements, maintain community relationships, establish operations and maintenance policies and procedures and overhaul planning and execution. This allocation is used when PSCo & SPS jurisdictions are benefiting from the services.	MWH generation

Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200142	ES Engineering and Construction PSCo and SPS	ES Engineering & Construction South services which include management and performance labor and non-labor costs for the following accountabilities: Researching, reviewing, recommending and facilitating the selection of technological alternatives for improved plant and environmental performance. Planning for Physical Plant Modifications, which includes consolidation and management of short-term and long-term plans for physical plant modifications. Develop and execute Innovative Technology Projects such as: Biomass, Solar, Wind. Establish uniform technology, design & equipment standards. This allocation is used when PSCo and SPS jurisdictions are benefiting from the services.	MWH generation
200146	Energy Markets - Regulated Trading	Energy Markets Regulated Trading services includes the labor and non-labor costs of providing electric trading services to the operating companies' electric generation systems, including load management, system optimization and origination.	MWH hours sold
200147	Business Objects	Business Objects includes the labor and non-labor costs for the application that provides critical reporting from data universes.	Number of Business Objects users
200148	Business Systems	Business Systems services includes the IT costs of providing assistance to computer users across the company. Specifically Computer technology risk, software maintenance on applications distributed to all users (i.e. Microsoft PC tools), governance and project management over all IT projects, fixed management fees with outside vendors, business analytics costs, corrective and preventative maintenance, security, data backup and recovery, help desk, and amortization of outside vendor fees and costs that are not specific to an application that has a specific allocator.	Number of computers
200149	CES (Customer & Enterprise Solutions)	The CES includes the labor and non-labor costs for the leadership of the Customer & Enterprise Solutions organization and their administrative support staff.	Number of computers/Number of customers/Number of employees
200150	IVR (Interactive Voice Response)	IVR includes the labor and non-labor costs for the application development and maintenance of the Interactive Voice Response system which interacts with a customer calling Xcel Energy call centers. It is intended to help service customers without invoking a call center agent. If the call needs to be handled by an agent, account information and the reason for the call is determined which helps route the call to the appropriate agent.	Number of contacts
200151	Customer Billing FERC 903	Customer Billing FERC 903 includes the labor and non-labor costs related to the delivery of billing statements, letters and notices to Xcel customers including postage and outside services costs, oversight and administration of customer billing area, research of billing exceptions, providing escalated customer service assistance with regard to billing issues resolution, and process remittances and receivables. This allocation is used when all four jurisdictions are benefiting from the services.	Number of customer bills

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Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200152	Customer Care 902	Customer Care 902 services includes the labor and non-labor costs for meter reading of retail and wholesale customers and determining consumption for billing purposes as well as executing field collections.	Number of customers
200153	Customer Safety Advertising/Information Costs	Customer Safety Advertising and Information costs services includes the labor and non-labor costs associated with public safety advertising, information and education.	Number of customers
200154	Customer Service IT FERC 903	Customer Service Information Technology (IT) FERC 903 services includes the labor and non-labor costs for IT applications related customer billing to customers, call center support and credit and collections.	Number of customers
200155	Customer Care (CC) 903	Customer Care (CC) 903 services includes the labor and non-labor costs for contact centers, remittance processing, credit and collections, customer resource management, and contact center training. This allocation is used when all four jurisdictions are benefiting from the services such as responding to residential customer inquiries regarding billings and outages, handling inbound credit calls, outbound collections calls, managing accounts receivables, training call center staffs, developing contact center call forecasts.	Number of customers
200156	Customer Care 901	Customer Care 901 services includes the labor and non-labor costs for the leadership of the customer care organization and their administrative support staff such as consulting costs to support overall Customer Care organizational operations.	Number of customers
200157	Customer Service IT FERC 903 - South	Customer Service Information Technology (IT) FERC 903 - South services includes the labor and non-labor costs for IT applications related customer billing to customers, call center support and credit and collections. This allocation is used when Public Service Company of Colorado and Southwestern Public Service Company are the only companies benefiting from the services.	Number of customers
200158	Customer Care 903 - South	Customer Care 903 services includes the labor and non-labor costs for the leadership of the customer care organization and their administrative support staff such as consulting costs to support overall Customer Care organizational operations.	Number of customers
200161	Customer Care Low Income Assistance (908)	Customer Care Low Income Assistance (908) services includes the labor and non-labor costs associated with the low income energy customer program such as answering calls from customers for referral to low income assistance agencies, providing information to the agencies in order to process applications for assistance, take pledges/commitments from agencies and process payments from agencies.	Number of residential customers/Number of low income customer calls
200162	CL/QM (Call Logging and Quality Management)	CL/QM includes the labor and non-labor operating costs for the application development and maintenance of the Call Logging and Quality Management system which is used to monitor and record calls for contact center training and leadership teams.	Number of customers/Number of contacts

Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200163	Employee Communications	Employee Communications includes the labor and non-labor costs for the development and enhancement of employee awareness and understanding of the company's strategies, priorities, decisions and performance objectives. It develops and produces regular communication vehicles, including TODAY (daily news bulleting on intranet); XTRA (monthly print publication for all employees and retirees); All Managers E-mail (real-time communication for employees who supervise and manage others); Focus on Financials for all employees; targeted communications for specific business areas, such as Human Resources, and employee meetings.	Number of employees
200164	Payroll	Payroll services include the labor and non-labor costs for processing payroll including consolidation of time collection, calculation of salaries and wages, administration of employee deductions, account distribution and reconciliation, allocation and accounting for employment taxes and compliance reports.	Number of employees
200165	Employee Management Systems	Employee Management Systems includes the labor and non-labor costs for the Security Operations Center (SOC), Time capture and processing for payroll and accounting and Human Resources software. These applications and services provide services for the whole company related to enterprise security, including physical access, security monitoring and investigations, payroll and time accounting and employee information databases.	Number of employees
200166	Human Resources (Diversity/Safety/Employee Relations)	Human Resources-Diversity/Safety/Employee Relations includes the labor and non-labor costs for work performed for operating and affiliate company employees, such as diversity programs, providing workforce relations resources for labor agreements, arbitration, and training. Manage, design, and implement Corporate Safety initiatives. Staffing administration for non-bargaining positions and provides Affirmative Action plans (development) and government audit management (compliance).	Number of employees
200167	e-Business	The e-Business system includes the labor and non-labor costs associated with the corporate electronic business infrastructure.	Number of employees
200169	Energy Supply Systems	Energy Supply Systems includes the labor and non-labor costs for the non-critical applications that support the Energy Supply area. Such as Emissions Tracker, Labworks, Maximo, Documentum and Meridian.	Number of Maximo Users
200170	Meter Reading and Monitoring Systems	Includes the labor and non-labor operating costs for the application development and maintenance of the software applications needed to read and monitor gas and electric meters.	Number of meters
200171	CRS (Customer Resource System)	The CRS system includes the labor and non-labor costs for the CRS system, specifically, application development and maintenance costs, licensing fees, server system costs and technology risk costs specific to disaster recovery of this application. CRS is Xcel Energy's customer service and billing system.	Number of meters/Number of contacts

Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200172	Network	Network services include the labor and non-labor costs for the operation, maintenance, and management of Xcel Energy's internal and external Information Technology Network. This includes circuits, firewalls and communication assets.	Phones/Radios/Computers
200173	Generation/Proprietary Trading - Back Office	Generation/Proprietary Trading - Back Office includes the labor and non-labor costs associated with oversight and administration of accounting related trading costs including proprietary and generation trading for Northern States Power Minnesota, Northern States Power Wisconsin, Public Service Company of Colorado and Southwestern Public Service Company.	Based on labor hour allocation by Commercial Operations front office trading activities, generation (purchase and sales) and proprietary, with the proprietary allocation to NSPM, PSCo & SPS. Proprietary trading dollars are allocated based on the Joint Operating Agreement.
200174	Generation/Proprietary Trading - Mid Office	Generation/Proprietary Trading - Mid Office includes the labor and non-labor costs associated with independent evaluation and risk measurement of trading and generation book transactions, including preparing daily P&L (profit and loss) reports and individual trader profit and loss reports for the prop book, daily generation book valuation reports for each system showing all net fuel positions and any forward sales values and/or hedges, ensuring that margin reporting follows all SEC rules and GAAP reporting and that credit and risk policies and procedures are complied with.	Based on labor hour allocation by Commercial Operations front office trading activities, generation (purchase and sales) and proprietary, with the proprietary allocation to NSPM, PSCo & SPS. Proprietary trading dollars are allocated based on the Joint Operating Agreement.
200175	Passport - Purchasing	Passport - Purchasing includes the labor and non-labor costs associated with the Purchasing module within Passport. This includes application development and maintenance costs, licensing fees, server system costs and technology risk costs specific to disaster recovery of this application.	Purchasing transactions
200176	Marketing & Sales	Marketing & Sales services includes the labor and non-labor costs for marketing and sales services for the operating companies for their customers including strategic planning, segment identification, business analysis, sales planning, customer service, promoting products to the business market, and providing regulatory and policy support with respect to utility Energy Efficiency and Demand Response program design, evaluation, measurement and verification, cost effectiveness testing, and cost recovery.	Revenue
200177	Rates & Regulation - Electric	Rates & Regulation - Electric includes the labor and non-labor costs for determining the regulated utilities' electric utility revenue requirements and rates for electric customers regulatory strategy, coordinating the regulatory compliance requirements, establishing and maintaining relationships with regulatory bodies, policy development of regulatory and legislative strategy, preparing and organizing rate case filings.	Direct Labor Dollars

Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200178	Rates & Regulation	Rates & Regulation includes the labor and non-labor costs for determining the regulated utilities' revenue requirements and rates for electric and gas customers regulatory strategy, coordinating the regulatory compliance requirements, establishing and maintaining relationships with regulatory bodies, policy development of regulatory and legislative strategy, preparing and organizing rate case filings.	Direct Labor Dollars
200179	Passport - All Modules	Passport - All Modules includes the labor and non-labor costs for accounts payable, inventory, work management and purchasing. This includes application development and maintenance costs, licensing fees, server system costs and technology risk costs specific to disaster recovery of this application.	Number of Passport transactions (AP/Inventory/WM/Purch)
200180	EMS-Shared (Energy Management System-SCADA)	EMS provides supervisory control and data acquisition of substation devices through Remote Terminal Units (RTU's). EMS-Shared system includes the labor and non-labor costs for the application development and maintenance of the Electric Transmission, Distribution and Production Plant information operations.	Electric transmission/Electric distribution/Electric production plant
200181	Energy Supply Environmental Policy & Services OPCo's	Energy Supply Environmental Policy & Services OPCo's services include the labor and non-labor costs dedicated to air quality, renewable energy, innovative technology and climate change, develop corporate compliance strategy, regulatory agency interaction (both at the federal and/or state level), permitting and compliance reporting, waste management, combustion byproducts management, environmental compliance auditing, provide support to the Environmental Council and assist with environmental communications strategies. This allocation is used when NSPM, NSPW, PSCo and SPS jurisdictions are benefiting from the services.	Gross Plant Assets
200183	Energy Supply Environmental Policy & Services South	Energy Supply Environmental Policy & Services South services include the labor and non-labor costs dedicated to air quality, renewable energy, innovative technology and climate change, develop corporate compliance strategy, regulatory agency interaction (both at the federal and/or state level), permitting and compliance reporting, waste management, combustion byproducts management, environmental compliance auditing, provide support to the Environmental Council and assist with environmental communications strategies. This allocation is used when PSCo and SPS jurisdictions are benefiting from the services.	Gross Plant Assets
200184	PowerPlant	PowerPlant includes the labor and non-labor operating costs for PowerPlant, which is the capital asset business system which includes the following modules: Fixed Assets, Power Tax, Property Tax, Projects, Budgets, Cost Repository, Depreciation studies and Depreciation forecast. This includes the application development and maintenance costs, licensing fees, server system costs and technology risk costs specific to disaster recovery of this application.	Total plant

Southwest Public Service Company
 XES Allocating Cost Center Descriptions

Cost Center Number	Title	Description of Services Provided	Allocation Methodology
200185	Passport - Work Management	Passport - Work Management includes the labor and non-labor costs associated with the Work Management module within Passport. This includes application development and maintenance costs, licensing fees, server system costs and technology risk costs specific to disaster recovery of this application.	Work management transactions
200805	Legal - OpCos - Electric	LEGAL OPco Electric services includes the labor and non-labor costs for operating companies electric utility legal services related to: labor and employment law, litigation, rates and regulation, environmental matters, real estate and contracts. This is primarily used by the General Counsel area.	Three-factor formula (assets, revenues, number of employees)

Southwestern Public Service Company

Allocating SCADA EMS

Electric Management System (EMS, also known as Electric SCADA)

Internal Order Number	Allocation Method	Reasonableness of Allocation Method	4/1/2018 - 3/31/2019 Percentages		
			FERC 556	FERC 561.2	FERC 581
800001988047	Number of RTUs	Number of RTUs is a reasonable methodology because the RTUs transmit the data used by the Electric SCADA system.	1.8809%	71.1563%	26.9628%

* FERC 556 - System Control and Load Dispatching (Production)

* FERC 561.2 - Load Dispatching (Transmission)

* FERC 581 - Load Dispatching (Distribution)

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Executive - Corporate Governance
SAP ACC 200063
SCB001
Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301367	F.01.03.301367.9210	9210	\$ 20,264,849	33.0281%	\$ 5,114,794	38.5903%	4,017	49.0896%	40.2360%
NSPW	0011	301368	F.01.03.301368.9210	9210	2,653,049	4.3240%	1,005,426	7.5858%	554	6.7701%	6.2266%
PSCo	0012	301369	F.01.03.301369.9210	9210	16,406,637	26.7399%	4,186,309	31.5851%	2,423	29.6102%	29.3117%
SPS	0013	301370	F.01.03.301370.9210	9210	5,994,041	9.7692%	1,918,725	14.4765%	1,177	14.3835%	12.8764%
Eloigne	0015	300009	300009	4171	104,991	0.1711%	10,029	0.0757%	-	0.0000%	0.0823%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0051%	-	0.0000%	-	0.0000%	0.0017%
United Power & Land	0019	300012	300012	4171	1,057	0.0017%	20	0.0002%	-	0.0000%	0.0006%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.1290%	1,013,275	7.6450%	12	0.1466%	10.9736%
1480 Welton	0029	300020	300020	4171	10,106	0.0165%	4,492	0.0339%	-	0.0000%	0.0168%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3007%	-	0.0000%	-	0.0000%	0.1002%
PSR Investments	0041	300026	300026	4171	8,821	0.0144%	-	0.0000%	-	0.0000%	0.0048%
WGI	0043	300027	300027	9210	814	0.0013%	188	0.0014%	-	0.0000%	0.0009%
Xcel Energy Performance Contracting	0051	300029	300029	4171	549	0.0009%	-	0.0000%	-	0.0000%	0.0003%
Chippewa Flambau	0057	300031	300031	4171	1,160	0.0019%	731	0.0055%	-	0.0000%	0.0025%
Clearwater	0058	300032	300032	4171	3,077	0.0050%	91	0.0007%	-	0.0000%	0.0019%
NSP Lands	0059	300033	300033	4171	128	0.0002%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Energy Impact Fund Investments LLC	0086	302160	302160	4171	18,042	0.0294%	-	0.0000%	-	0.0000%	0.0098%
Nicollet Projects I LLC	0088	302162	302162	4171	46,300	0.0755%	-	0.0000%	-	0.0000%	0.0252%
Capital Services, LLC	0089	302163	302163	4171	235,430	0.3837%	-	0.0000%	-	0.0000%	0.1279%
Total					\$ 61,356,366	100.0000%	\$ 13,254,080	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Shareholder - Corporate Governance
SAP ACC 200064

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301367	F.01.03.301367.9210	9210	\$ 20,264,849	33.0281%	\$ 5,114,794	38.5903%	4,017	49.0896%	40.2360%
NSPW	0011	301397	F.01.03.301397.9210	9210	2,653,049	4.3240%	1,005,426	7.5858%	554	6.7701%	6.2266%
PSCo	0012	301398	F.01.03.301398.9210	9210	16,406,637	26.7399%	4,186,309	31.5851%	2,423	29.6102%	29.3117%
SPS	0013	301399	F.01.03.301399.9210	9210	5,994,041	9.7692%	1,918,725	14.4765%	1,177	14.3835%	12.8764%
Eloigne	0015	300009	300009	4171	104,991	0.1711%	10,029	0.0757%	-	0.0000%	0.0823%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0051%	-	0.0000%	-	0.0000%	0.0017%
United Power & Land	0019	300012	300012	4171	1,057	0.0017%	20	0.0002%	-	0.0000%	0.0006%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.1290%	1,013,275	7.6450%	12	0.1466%	10.9736%
1480 Welton	0029	300020	300020	4171	10,106	0.0165%	4,492	0.0339%	-	0.0000%	0.0168%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3007%	-	0.0000%	-	0.0000%	0.1002%
PSR Investments	0041	300026	300026	4171	8,821	0.0144%	-	0.0000%	-	0.0000%	0.0048%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0013%	188	0.0014%	-	0.0000%	0.0009%
Xcel Energy Performance Contracting	0051	300029	300029	4171	549	0.0009%	-	0.0000%	-	0.0000%	0.0003%
Chippewa Flambeau	0057	300031	300031	4171	1,160	0.0019%	731	0.0055%	-	0.0000%	0.0025%
Clearwater	0058	300032	300032	4171	3,077	0.0050%	91	0.0007%	-	0.0000%	0.0019%
NSP Lands	0059	300033	300033	4171	128	0.0002%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Energy Impact Fund Investments LLC	0086	302160	302160	4171	18,042	0.0294%	-	0.0000%	-	0.0000%	0.0098%
Nicollet Projects I LLC	0088	302162	302162	4171	46,300	0.0755%	-	0.0000%	-	0.0000%	0.0252%
Capital Services, LLC	0089	302163	302163	4171	235,430	0.3837%	-	0.0000%	-	0.0000%	0.1279%
Total					\$ 61,356,366	100.0000%	\$ 13,254,080	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Investor Relations - Corporate Governance
SAP ACC 200065

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301467	F.01.03.301467.9210	9210	\$ 20,264,849	33.0281%	\$ 5,114,794	38.5903%	4,017	49.0896%	40.2360%
NSPW	0011	301471	F.01.03.301471.9210	9210	2,653,049	4.3240%	1,005,426	7.5858%	554	6.7701%	6.2266%
PSCo	0012	301475	F.01.03.301475.9210	9210	16,406,637	26.7399%	4,186,309	31.5851%	2,423	29.6102%	29.3117%
SPS	0013	301476	F.01.03.301476.9210	9210	5,994,041	9.7692%	1,918,725	14.4765%	1,177	14.3835%	12.8764%
Eloigne	0015	300009	300009	4171	104,991	0.1711%	10,029	0.0757%	-	0.0000%	0.0823%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0051%	-	0.0000%	-	0.0000%	0.0017%
United Power & Land	0019	300012	300012	4171	1,057	0.0017%	20	0.0002%	-	0.0000%	0.0006%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.1290%	1,013,275	7.6450%	12	0.1466%	10.9736%
1480 Welton	0029	300020	300020	4171	10,106	0.0165%	4,492	0.0339%	-	0.0000%	0.0168%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3007%	-	0.0000%	-	0.0000%	0.1002%
PSR Investments	0041	300026	300026	4171	8,821	0.0144%	-	0.0000%	-	0.0000%	0.0048%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0013%	188	0.0014%	-	0.0000%	0.0009%
Xcel Energy Performance Contracting	0051	300029	300029	4171	549	0.0009%	-	0.0000%	-	0.0000%	0.0003%
Chippewa Flambeau	0057	300031	300031	4171	1,160	0.0019%	731	0.0055%	-	0.0000%	0.0025%
Clearwater	0058	300032	300032	4171	3,077	0.0050%	91	0.0007%	-	0.0000%	0.0019%
NSP Lands	0059	300033	300033	4171	128	0.0002%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Energy Impact Fund Investments LLC	0086	302160	302160	4171	18,042	0.0294%	-	0.0000%	-	0.0000%	0.0098%
Nicollet Projects I LLC	0088	302162	302162	4171	46,300	0.0755%	-	0.0000%	-	0.0000%	0.0252%
Capital Services, LLC	0089	302163	302163	4171	235,430	0.3837%	-	0.0000%	-	0.0000%	0.1279%
Total					\$ 61,356,366	100.0000%	\$ 13,254,080	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Accounting & Reporting - Corporate Governance
SAP ACC 200066

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301683	F.01.03.301683.9210	9210	\$ 20,264,849	33.0281%	\$ 5,114,794	38.5903%	4,017	49.0896%	40.2360%
NSPW	0011	301684	F.01.03.301684.9210	9210	2,653,049	4.3240%	1,005,426	7.5858%	554	6.7701%	6.2266%
PSCo	0012	301685	F.01.03.301685.9210	9210	16,406,637	26.7399%	4,186,309	31.5851%	2,423	29.6102%	29.3117%
SPS	0013	301476	F.01.03.301476.9210	9210	5,994,041	9.7692%	1,918,725	14.4765%	1,177	14.3835%	12.8764%
Eloigne	0015	300009	300009	4171	104,991	0.1711%	10,029	0.0757%	-	0.0000%	0.0823%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0051%	-	0.0000%	-	0.0000%	0.0017%
United Power & Land	0019	300012	300012	4171	1,057	0.0017%	20	0.0002%	-	0.0000%	0.0006%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.1290%	1,013,275	7.6450%	12	0.1466%	10.9736%
1480 Welton	0029	300020	300020	4171	10,106	0.0165%	4,492	0.0339%	-	0.0000%	0.0168%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3007%	-	0.0000%	-	0.0000%	0.1002%
PSR Investments	0041	300026	300026	4171	8,821	0.0144%	-	0.0000%	-	0.0000%	0.0048%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0013%	188	0.0014%	-	0.0000%	0.0009%
Xcel Energy Performance Contracting	0051	300029	300029	4171	549	0.0009%	-	0.0000%	-	0.0000%	0.0003%
Chippewa Flambeau	0057	300031	300031	4171	1,160	0.0019%	731	0.0055%	-	0.0000%	0.0025%
Clearwater	0058	300032	300032	4171	3,077	0.0050%	91	0.0007%	-	0.0000%	0.0019%
NSP Lands	0059	300033	300033	4171	128	0.0002%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Energy Impact Fund Investments LLC	0086	302160	302160	4171	18,042	0.0294%	-	0.0000%	-	0.0000%	0.0098%
Nicollet Projects I LLC	0088	302162	302162	4171	46,300	0.0755%	-	0.0000%	-	0.0000%	0.0252%
Capital Services, LLC	0089	302163	302163	4171	235,430	0.3837%	-	0.0000%	-	0.0000%	0.1279%
Total					\$ 61,356,366	100.0000%	\$ 13,254,080	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Audit Services - Corporate Governance
SAP ACC 200067

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301425	F.01.03.301425.9210	9210	\$ 20,264,849	33.0281%	\$ 5,114,794	38.5903%	4,017	49.0896%	40.2360%
NSPW	0011	301426	F.01.03.301426.9210	9210	2,653,049	4.3240%	1,005,426	7.5858%	554	6.7701%	6.2266%
PSCo	0012	301427	F.01.03.301427.9210	9210	16,406,637	26.7399%	4,186,309	31.5851%	2,423	29.6102%	29.3117%
SPS	0013	301428	F.01.03.301428.9210	9210	5,994,041	9.7692%	1,918,725	14.4765%	1,177	14.3835%	12.8764%
Eloigne	0015	300009	300009	4171	104,991	0.1711%	10,029	0.0757%	-	0.0000%	0.0823%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0051%	-	0.0000%	-	0.0000%	0.0017%
United Power & Land	0019	300012	300012	4171	1,057	0.0017%	20	0.0002%	-	0.0000%	0.0006%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.1290%	1,013,275	7.6450%	12	0.1466%	10.9736%
1480 Welton	0029	300020	300020	4171	10,106	0.0165%	4,492	0.0339%	-	0.0000%	0.0168%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3007%	-	0.0000%	-	0.0000%	0.1002%
PSR Investments	0041	300026	300026	4171	8,821	0.0144%	-	0.0000%	-	0.0000%	0.0048%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0013%	188	0.0014%	-	0.0000%	0.0009%
Xcel Energy Performance Contracting	0051	300029	300029	4171	549	0.0009%	-	0.0000%	-	0.0000%	0.0003%
Chippewa Flambeau	0057	300031	300031	4171	1,160	0.0019%	731	0.0055%	-	0.0000%	0.0025%
Clearwater	0058	300032	300032	4171	3,077	0.0050%	91	0.0007%	-	0.0000%	0.0019%
NSP Lands	0059	300033	300033	4171	128	0.0002%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Energy Impact Fund Investments LLC	0086	302160	302160	4171	18,042	0.0294%	-	0.0000%	-	0.0000%	0.0098%
Nicollet Projects I LLC	0088	302162	302162	4171	46,300	0.0755%	-	0.0000%	-	0.0000%	0.0252%
Capital Services, LLC	0089	302163	302163	4171	235,430	0.3837%	-	0.0000%	-	0.0000%	0.1279%
Total					\$ 61,356,366	100.0000%	\$ 13,254,080	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Finance & Treasury - Corporate Governance
SAP ACC 200068

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301441	F.01.03.301441.9210	9210	\$ 20,264,849	33.0281%	\$ 5,114,794	38.5903%	4,017	49.0896%	40.2360%
NSPW	0011	301442	F.01.03.301442.9210	9210	2,653,049	4.3240%	1,005,426	7.5858%	554	6.7701%	6.2266%
PSCo	0012	301443	F.01.03.301443.9210	9210	16,406,637	26.7399%	4,186,309	31.5851%	2,423	29.6102%	29.3117%
SPS	0013	301444	F.01.03.301444.9210	9210	5,994,041	9.7692%	1,918,725	14.4765%	1,177	14.3835%	12.8764%
Eloigne	0015	300009	300009	4171	104,991	0.1711%	10,029	0.0757%	-	0.0000%	0.0823%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0051%	-	0.0000%	-	0.0000%	0.0017%
United Power & Land	0019	300012	300012	4171	1,057	0.0017%	20	0.0002%	-	0.0000%	0.0006%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.1290%	1,013,275	7.6450%	12	0.1466%	10.9736%
1480 Welton	0029	300020	300020	4171	10,106	0.0165%	4,492	0.0339%	-	0.0000%	0.0168%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3007%	-	0.0000%	-	0.0000%	0.1002%
PSR Investments	0041	300026	300026	4171	8,821	0.0144%	-	0.0000%	-	0.0000%	0.0048%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0013%	188	0.0014%	-	0.0000%	0.0009%
Xcel Energy Performance Contracting	0051	300029	300029	4171	549	0.0009%	-	0.0000%	-	0.0000%	0.0003%
Chippewa Flambeau	0057	300031	300031	4171	1,160	0.0019%	731	0.0055%	-	0.0000%	0.0025%
Clearwater	0058	300032	300032	4171	3,077	0.0050%	91	0.0007%	-	0.0000%	0.0019%
NSP Lands	0059	300033	300033	4171	128	0.0002%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Energy Impact Fund Investments LLC	0086	302160	302160	4171	18,042	0.0294%	-	0.0000%	-	0.0000%	0.0098%
Nicollet Projects I LLC	0088	302162	302162	4171	46,300	0.0755%	-	0.0000%	-	0.0000%	0.0252%
Capital Services, LLC	0089	302163	302163	4171	235,430	0.3837%	-	0.0000%	-	0.0000%	0.1279%
Total					\$ 61,356,366	100.0000%	\$ 13,254,080	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Risk Management - Corporate Governance
SAP ACC 200069

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301477	F.01.03.301477.9210	9210	\$ 20,264,849	33.0281%	\$ 5,114,794	38.5903%	4,017	49.0896%	40.2360%
NSPW	0011	301478	F.01.03.301478.9210	9210	2,653,049	4.3240%	1,005,426	7.5858%	554	6.7701%	6.2266%
PSCo	0012	301479	F.01.03.301479.9210	9210	16,406,637	26.7399%	4,186,309	31.5851%	2,423	29.6102%	29.3117%
SPS	0013	301480	F.01.03.301480.9210	9210	5,994,041	9.7692%	1,918,725	14.4765%	1,177	14.3835%	12.8764%
Eloigne	0015	300009	300009	4171	104,991	0.1711%	10,029	0.0757%	-	0.0000%	0.0823%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0051%	-	0.0000%	-	0.0000%	0.0017%
United Power & Land	0019	300012	300012	4171	1,057	0.0017%	20	0.0002%	-	0.0000%	0.0006%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.1290%	1,013,275	7.6450%	12	0.1466%	10.9736%
1480 Welton	0029	300020	300020	4171	10,106	0.0165%	4,492	0.0339%	-	0.0000%	0.0168%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3007%	-	0.0000%	-	0.0000%	0.1002%
PSR Investments	0041	300026	300026	4171	8,821	0.0144%	-	0.0000%	-	0.0000%	0.0048%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0013%	188	0.0014%	-	0.0000%	0.0009%
Xcel Energy Performance Contracting	0051	300029	300029	4171	549	0.0009%	-	0.0000%	-	0.0000%	0.0003%
Chippewa Flambeau	0057	300031	300031	4171	1,160	0.0019%	731	0.0055%	-	0.0000%	0.0025%
Clearwater	0058	300032	300032	4171	3,077	0.0050%	91	0.0007%	-	0.0000%	0.0019%
NSP Lands	0059	300033	300033	4171	128	0.0002%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Energy Impact Fund Investments LLC	0086	302160	302160	4171	18,042	0.0294%	-	0.0000%	-	0.0000%	0.0098%
Nicollet Projects I LLC	0088	302162	302162	4171	46,300	0.0755%	-	0.0000%	-	0.0000%	0.0252%
Capital Services, LLC	0089	302163	302163	4171	235,430	0.3837%	-	0.0000%	-	0.0000%	0.1279%
Total					\$ 61,356,366	100.0000%	\$ 13,254,080	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Corporate Strategy & Business Development - Corporate Governance
SAP ACC 200070
Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301585	F.01.03.301585.9210	9210	\$ 20,264,849	33.0281%	\$ 5,114,794	38.5903%	4,017	49.0896%	40.2360%
NSPW	0011	301586	F.01.03.301586.9210	9210	2,653,049	4.3240%	1,005,426	7.5858%	554	6.7701%	6.2266%
PSCo	0012	301589	F.01.03.301589.9210	9210	16,406,637	26.7399%	4,186,309	31.5851%	2,423	29.6102%	29.3117%
SPS	0013	301590	F.01.03.301590.9210	9210	5,994,041	9.7692%	1,918,725	14.4765%	1,177	14.3835%	12.8764%
Eloigne	0015	300009	300009	4171	104,991	0.1711%	10,029	0.0757%	-	0.0000%	0.0823%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0051%	-	0.0000%	-	0.0000%	0.0017%
United Power & Land	0019	300012	300012	4171	1,057	0.0017%	20	0.0002%	-	0.0000%	0.0006%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.1290%	1,013,275	7.6450%	12	0.1466%	10.9736%
1480 Welton	0029	300020	300020	4171	10,106	0.0165%	4,492	0.0339%	-	0.0000%	0.0168%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3007%	-	0.0000%	-	0.0000%	0.1002%
PSR Investments	0041	300026	300026	4171	8,821	0.0144%	-	0.0000%	-	0.0000%	0.0048%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0013%	188	0.0014%	-	0.0000%	0.0009%
Xcel Energy Performance Contracting	0051	300029	300029	4171	549	0.0009%	-	0.0000%	-	0.0000%	0.0003%
Chippewa Flambeau	0057	300031	300031	4171	1,160	0.0019%	731	0.0055%	-	0.0000%	0.0025%
Clearwater	0058	300032	300032	4171	3,077	0.0050%	91	0.0007%	-	0.0000%	0.0019%
NSP Lands	0059	300033	300033	4171	128	0.0002%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Energy Impact Fund Investments LLC	0086	302160	302160	4171	18,042	0.0294%	-	0.0000%	-	0.0000%	0.0098%
Nicollet Projects I LLC	0088	302162	302162	4171	46,300	0.0755%	-	0.0000%	-	0.0000%	0.0252%
Capital Services, LLC	0089	302163	302163	4171	235,430	0.3837%	-	0.0000%	-	0.0000%	0.1279%
Total					\$ 61,356,366	100.0000%	\$ 13,254,080	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Legal - Corporate Governance
SAP ACC 200071

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301563	F.01.03.301563.9210	9210	\$ 20,264,849	33.0281%	\$ 5,114,794	38.5903%	4,017	49.0896%	40.2360%
NSPW	0011	302044	F.01.03.302044.9210	9210	2,653,049	4.3240%	1,005,426	7.5858%	554	6.7701%	6.2266%
PSCo	0012	300388	F.01.03.300388.9210	9210	16,406,637	26.7399%	4,186,309	31.5851%	2,423	29.6102%	29.3117%
SPS	0013	300390	F.01.03.300390.9210	9210	5,994,041	9.7692%	1,918,725	14.4765%	1,177	14.3835%	12.8764%
Eloigne	0015	300009	300009	4171	104,991	0.1711%	10,029	0.0757%	-	0.0000%	0.0823%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0051%	-	0.0000%	-	0.0000%	0.0017%
United Power & Land	0019	300012	300012	4171	1,057	0.0017%	20	0.0002%	-	0.0000%	0.0006%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.1290%	1,013,275	7.6450%	12	0.1466%	10.9736%
1480 Welton	0029	300020	300020	4171	10,106	0.0165%	4,492	0.0339%	-	0.0000%	0.0168%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3007%	-	0.0000%	-	0.0000%	0.1002%
PSR Investments	0041	300026	300026	4171	8,821	0.0144%	-	0.0000%	-	0.0000%	0.0048%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0013%	188	0.0014%	-	0.0000%	0.0009%
Xcel Energy Performance Contracting	0051	300029	300029	4171	549	0.0009%	-	0.0000%	-	0.0000%	0.0003%
Chippewa Flambeau	0057	300031	300031	4171	1,160	0.0019%	731	0.0055%	-	0.0000%	0.0025%
Clearwater	0058	300032	300032	4171	3,077	0.0050%	91	0.0007%	-	0.0000%	0.0019%
NSP Lands	0059	300033	300033	4171	128	0.0002%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Energy Impact Fund Investments LLC	0086	302160	302160	4171	18,042	0.0294%	-	0.0000%	-	0.0000%	0.0098%
Nicollet Projects I LLC	0088	302162	302162	4171	46,300	0.0755%	-	0.0000%	-	0.0000%	0.0252%
Capital Services, LLC	0089	302163	302163	4171	235,430	0.3837%	-	0.0000%	-	0.0000%	0.1279%
Total					\$ 61,356,366	100.0000%	\$ 13,254,080	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Communications - Corporate Governance
SAP ACC 200072

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	300788	F.01.03.300788.9210	9210	\$ 20,264,849	33.0281%	\$ 5,114,794	38.5903%	4,017	49.0896%	40.2360%
NSPW	0011	300791	F.01.03.300791.9210	9210	2,653,049	4.3240%	1,005,426	7.5858%	554	6.7701%	6.2266%
PSCo	0012	300794	F.01.03.300794.9210	9210	16,406,637	26.7399%	4,186,309	31.5851%	2,423	29.6102%	29.3117%
SPS	0013	300795	F.01.03.300795.9210	9210	5,994,041	9.7692%	1,918,725	14.4765%	1,177	14.3835%	12.8764%
Eloigne	0015	300009	300009	4171	104,991	0.1711%	10,029	0.0757%	-	0.0000%	0.0823%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0051%	-	0.0000%	-	0.0000%	0.0017%
United Power & Land	0019	300012	300012	4171	1,057	0.0017%	20	0.0002%	-	0.0000%	0.0006%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.1290%	1,013,275	7.6450%	12	0.1466%	10.9736%
1480 Welton	0029	300020	300020	4171	10,106	0.0165%	4,492	0.0339%	-	0.0000%	0.0168%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3007%	-	0.0000%	-	0.0000%	0.1002%
PSR Investments	0041	300026	300026	4171	8,821	0.0144%	-	0.0000%	-	0.0000%	0.0048%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0013%	188	0.0014%	-	0.0000%	0.0009%
Xcel Energy Performance Contracting	0051	300029	300029	4171	549	0.0009%	-	0.0000%	-	0.0000%	0.0003%
Chippewa Flambeau	0057	300031	300031	4171	1,160	0.0019%	731	0.0055%	-	0.0000%	0.0025%
Clearwater	0058	300032	300032	4171	3,077	0.0050%	91	0.0007%	-	0.0000%	0.0019%
NSP Lands	0059	300033	300033	4171	128	0.0002%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Energy Impact Fund Investments LLC	0086	302160	302160	4171	18,042	0.0294%	-	0.0000%	-	0.0000%	0.0098%
Nicollet Projects I LLC	0088	302162	302162	4171	46,300	0.0755%	-	0.0000%	-	0.0000%	0.0252%
Capital Services, LLC	0089	302163	302163	4171	235,430	0.3837%	-	0.0000%	-	0.0000%	0.1279%
Total					\$ 61,356,366	100.0000%	\$ 13,254,080	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Human Resources (HR) - Corporate Governance
SAP ACC 200073

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	300416	F.01.03.300416.9210	9210	\$ 20,264,849	33.0281%	\$ 5,114,794	38.5903%	4,017	49.0896%	40.2360%
NSPW	0011	300419	F.01.03.300419.9210	9210	2,653,049	4.3240%	1,005,426	7.5858%	554	6.7701%	6.2266%
PSCo	0012	300422	F.01.03.300422.9210	9210	16,406,637	26.7399%	4,186,309	31.5851%	2,423	29.6102%	29.3117%
SPS	0013	300423	F.01.03.300423.9210	9210	5,994,041	9.7692%	1,918,725	14.4765%	1,177	14.3835%	12.8764%
Eloigne	0015	300009	300009	4171	104,991	0.1711%	10,029	0.0757%	-	0.0000%	0.0823%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0051%	-	0.0000%	-	0.0000%	0.0017%
United Power & Land	0019	300012	300012	4171	1,057	0.0017%	20	0.0002%	-	0.0000%	0.0006%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.1290%	1,013,275	7.6450%	12	0.1466%	10.9736%
1480 Welton	0029	300020	300020	4171	10,106	0.0165%	4,492	0.0339%	-	0.0000%	0.0168%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3007%	-	0.0000%	-	0.0000%	0.1002%
PSR Investments	0041	300026	300026	4171	8,821	0.0144%	-	0.0000%	-	0.0000%	0.0048%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0013%	188	0.0014%	-	0.0000%	0.0009%
Xcel Energy Performance Contracting	0051	300029	300029	4171	549	0.0009%	-	0.0000%	-	0.0000%	0.0003%
Chippewa Flambeau	0057	300031	300031	4171	1,160	0.0019%	731	0.0055%	-	0.0000%	0.0025%
Clearwater	0058	300032	300032	4171	3,077	0.0050%	91	0.0007%	-	0.0000%	0.0019%
NSP Lands	0059	300033	300033	4171	128	0.0002%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Energy Impact Fund Investments LLC	0086	302160	302160	4171	18,042	0.0294%	-	0.0000%	-	0.0000%	0.0098%
Nicollet Projects I LLC	0088	302162	302162	4171	46,300	0.0755%	-	0.0000%	-	0.0000%	0.0252%
Capital Services, LLC	0089	302163	302163	4171	235,430	0.3837%	-	0.0000%	-	0.0000%	0.1279%
Total					\$ 61,356,366	100.0000%	\$ 13,254,080	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Corporate Systems - Corporate Governance
SAP ACC 200074

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301673	F.01.03.301673.9210	9210	\$ 20,264,849	33.0281%	\$ 5,114,794	38.5903%	4,017	49.0896%	40.2360%
NSPW	0011	301674	F.01.03.301674.9210	9210	2,653,049	4.3240%	1,005,426	7.5858%	554	6.7701%	6.2266%
PSCo	0012	301675	F.01.03.301675.9210	9210	16,406,637	26.7399%	4,186,309	31.5851%	2,423	29.6102%	29.3117%
SPS	0013	301676	F.01.03.301676.9210	9210	5,994,041	9.7692%	1,918,725	14.4765%	1,177	14.3835%	12.8764%
Eloigne	0015	300009	300009	4171	104,991	0.1711%	10,029	0.0757%	-	0.0000%	0.0823%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0051%	-	0.0000%	-	0.0000%	0.0017%
United Power & Land	0019	300012	300012	4171	1,057	0.0017%	20	0.0002%	-	0.0000%	0.0006%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.1290%	1,013,275	7.6450%	12	0.1466%	10.9736%
1480 Welton	0029	300020	300020	4171	10,106	0.0165%	4,492	0.0339%	-	0.0000%	0.0168%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3007%	-	0.0000%	-	0.0000%	0.1002%
PSR Investments	0041	300026	300026	4171	8,821	0.0144%	-	0.0000%	-	0.0000%	0.0048%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0013%	188	0.0014%	-	0.0000%	0.0009%
Xcel Energy Performance Contracting	0051	300029	300029	4171	549	0.0009%	-	0.0000%	-	0.0000%	0.0003%
Chippewa Flambeau	0057	300031	300031	4171	1,160	0.0019%	731	0.0055%	-	0.0000%	0.0025%
Clearwater	0058	300032	300032	4171	3,077	0.0050%	91	0.0007%	-	0.0000%	0.0019%
NSP Lands	0059	300033	300033	4171	128	0.0002%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Energy Impact Fund Investments LLC	0086	302160	302160	4171	18,042	0.0294%	-	0.0000%	-	0.0000%	0.0098%
Nicollet Projects I LLC	0088	302162	302162	4171	46,300	0.0755%	-	0.0000%	-	0.0000%	0.0252%
Capital Services, LLC	0089	302163	302163	4171	235,430	0.3837%	-	0.0000%	-	0.0000%	0.1279%
Total					\$ 61,356,366	100.0000%	\$ 13,254,080	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Board of Directors - Corporate Governance
SAP ACC 200075

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	300500	F.01.03.300500.9302	9302	\$ 20,264,849	33.0281%	\$ 5,114,794	38.5903%	4,017	49.0896%	40.2360%
NSPW	0011	300504	F.01.03.300504.9302	9302	2,653,049	4.3240%	1,005,426	7.5858%	554	6.7701%	6.2266%
PSCo	0012	300509	F.01.03.300509.9302	9302	16,406,637	26.7399%	4,186,309	31.5851%	2,423	29.6102%	29.3117%
SPS	0013	300511	F.01.03.300511.9302	9302	5,994,041	9.7692%	1,918,725	14.4765%	1,177	14.3835%	12.8764%
Eloigne	0015	300009	300009	4171	104,991	0.1711%	10,029	0.0757%	-	0.0000%	0.0823%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0051%	-	0.0000%	-	0.0000%	0.0017%
United Power & Land	0019	300012	300012	4171	1,057	0.0017%	20	0.0002%	-	0.0000%	0.0006%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.1290%	1,013,275	7.6450%	12	0.1466%	10.9736%
1480 Welton	0029	300020	300020	4171	10,106	0.0165%	4,492	0.0339%	-	0.0000%	0.0168%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3007%	-	0.0000%	-	0.0000%	0.1002%
PSR Investments	0041	300026	300026	4171	8,821	0.0144%	-	0.0000%	-	0.0000%	0.0048%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0013%	188	0.0014%	-	0.0000%	0.0009%
Xcel Energy Performance Contracting	0051	300029	300029	4171	549	0.0009%	-	0.0000%	-	0.0000%	0.0003%
Chippewa Flambeau	0057	300031	300031	4171	1,160	0.0019%	731	0.0055%	-	0.0000%	0.0025%
Clearwater	0058	300032	300032	4171	3,077	0.0050%	91	0.0007%	-	0.0000%	0.0019%
NSP Lands	0059	300033	300033	4171	128	0.0002%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9302	9302	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9302	9302	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9302	9302	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Energy Impact Fund Investments LLC	0086	302160	302160	4171	18,042	0.0294%	-	0.0000%	-	0.0000%	0.0098%
Nicollet Projects I LLC	0088	302162	302162	4171	46,300	0.0755%	-	0.0000%	-	0.0000%	0.0252%
Capital Services, LLC	0089	302163	302163	4171	235,430	0.3837%	-	0.0000%	-	0.0000%	0.1279%
Total					\$ 61,356,366	100.0000%	\$ 13,254,080	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Xcel Foundation
SAP ACC 200076

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301601	F.01.03.301601.9210	9210	\$ 20,264,849	33.2632%	\$ 5,114,794	38.6357%	4,017	49.0896%	40.3296%
NSPW	0011	302044	F.01.03.302044.9210	9210	2,653,049	4.3548%	1,005,426	7.5947%	554	6.7701%	6.2399%
PSCo	0012	301382	F.01.03.301382.9210	9210	16,406,637	26.9302%	4,186,309	31.6222%	2,423	29.6102%	29.3875%
SPS	0013	301680	F.01.03.301680.9210	9210	5,994,041	9.8388%	1,918,725	14.4935%	1,177	14.3835%	12.9052%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.3079%	1,013,275	7.6540%	12	0.1466%	11.0362%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3028%	-	0.0000%	-	0.0000%	0.1009%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Total					\$ 60,922,764	100.0000%	\$ 13,238,529	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Branding
SAP ACC 200077 Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	300788	F.01.03.300788.9210	9210	\$ 20,264,849	33.2632%	\$ 5,114,794	38.6357%	4,017	49.0896%	40.3296%
NSPW	0011	300791	F.01.03.300791.9210	9210	2,653,049	4.3548%	1,005,426	7.5947%	554	6.7701%	6.2399%
PSCo	0012	300794	F.01.03.300794.9210	9210	16,406,637	26.9302%	4,186,309	31.6222%	2,423	29.6102%	29.3875%
SPS	0013	300795	F.01.03.300795.9210	9210	5,994,041	9.8388%	1,918,725	14.4935%	1,177	14.3835%	12.9052%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.3079%	1,013,275	7.6540%	12	0.1466%	11.0362%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.3028%	-	0.0000%	-	0.0000%	0.1009%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Total					\$ 60,922,764	100.0000%	\$ 13,238,529	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Governmental Affairs
SAP ACC 200078

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	300641	F.01.03.300641.9210	9210	\$ 20,264,849	33.3642%	\$ 5,114,794	38.6357%	4,017	49.0896%	40.3632%
NSPW	0011	300681	F.01.03.300681.9210	9210	2,653,049	4.3680%	1,005,426	7.5947%	554	6.7701%	6.2443%
PSCo	0012	300697	F.01.03.300697.9210	9210	16,406,637	27.0120%	4,186,309	31.6222%	2,423	29.6102%	29.4148%
SPS	0013	300773	F.01.03.300773.9210	9210	5,994,041	9.8686%	1,918,725	14.4935%	1,177	14.3835%	12.9152%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.3848%	1,013,275	7.6540%	12	0.1466%	11.0618%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Total					\$ 60,738,266	100.0000%	\$ 13,238,529	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	302054	F.01.03.302054.4264	4264	\$ 20,264,849	33.3642%	\$ 5,114,794	38.6357%	4,017	49.0896%	40.3632%
NSPW	0011	302055	F.01.03.302055.4264	4264	2,653,049	4.3680%	1,005,426	7.5947%	554	6.7701%	6.2443%
PSCo	0012	300698	F.01.03.300698.4264	4264	16,406,637	27.0120%	4,186,309	31.6222%	2,423	29.6102%	29.4148%
SPS	0013	300821	F.01.03.300821.4264	4264	5,994,041	9.8686%	1,918,725	14.4935%	1,177	14.3835%	12.9152%
Xcel Energy	0023	300014	300014	4171	15,418,262	25.3848%	1,013,275	7.6540%	12	0.1466%	11.0618%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.4264	4264	754	0.0012%	-	0.0000%	-	0.0000%	0.0004%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.4264	4264	219	0.0004%	-	0.0000%	-	0.0000%	0.0001%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.4264	4264	455	0.0007%	-	0.0000%	-	0.0000%	0.0002%
Total					\$ 60,738,266	100.0000%	\$ 13,238,529	100.0000%	8,183	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Capital Asset Accounting
SAP ACC 200080

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301683	F.01.03.301683.9210	9210	\$ 20,264,849	44.4154%	5,114,794	41.7851%	4,017	49.1617%	45.1207%
NSPW	0011	301684	F.01.03.301684.9210	9210	2,653,049	5.8148%	1,005,426	8.2138%	554	6.7801%	6.9362%
PSCo	0012	301685	F.01.03.301685.9210	9210	16,406,637	35.9592%	4,186,309	34.1999%	2,423	29.6537%	33.2709%
SPS	0013	301476	F.01.03.301476.9210	9210	5,994,041	13.1374%	1,918,725	15.6749%	1,177	14.4046%	14.4057%
Eloigne	0015	300009	300009	4171	104,991	0.2301%	10,029	0.0819%	-	0.0000%	0.1040%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0069%	-	0.0000%	-	0.0000%	0.0023%
United Power & Land	0019	300012	300012	4171	1,057	0.0023%	20	0.0002%	-	0.0000%	0.0008%
1480 Welton	0029	300020	300020	4171	10,106	0.0221%	4,492	0.0367%	-	0.0000%	0.0196%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	184,498	0.4044%	-	0.0000%	-	0.0000%	0.1348%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0018%	188	0.0015%	-	0.0000%	0.0011%
Chippewa Flambeau	0057	300031	300031	4171	1,160	0.0025%	731	0.0060%	-	0.0000%	0.0028%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,625,757	100.0000%	\$ 12,240,714	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Accounting, Reporting, & Taxes
SAP ACC 200081

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301683	F.01.03.301683.9210	9210	\$ 20,264,849	44.6925%	\$ 5,114,794	41.8219%	4,017	49.1617%	45.2253%
NSPW	0011	301684	F.01.03.301684.9210	9210	2,653,049	5.8511%	1,005,426	8.2210%	554	6.7801%	6.9507%
PSCo	0012	301685	F.01.03.301685.9210	9210	16,406,637	36.1835%	4,186,309	34.2300%	2,423	29.6537%	33.3557%
SPS	0013	301476	F.01.03.301476.9210	9210	5,994,041	13.2194%	1,918,725	15.6888%	1,177	14.4046%	14.4376%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0069%	-	0.0000%	-	0.0000%	0.0023%
1480 Welton	0029	300020	300020	4171	10,106	0.0223%	4,492	0.0367%	-	0.0000%	0.0197%
PSR Investments	0041	300026	300026	4171	8,821	0.0195%	-	0.0000%	-	0.0000%	0.0065%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0018%	188	0.0015%	-	0.0000%	0.0011%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,342,872	100.0000%	\$ 12,229,934	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Audit Services
SAP ACC 200082

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301425	F.01.03.301425.9210	9210	\$ 20,264,849	44.6925%	\$ 5,114,794	41.8219%	4,017	49.1617%	45.2253%
NSPW	0011	301426	F.01.03.301426.9210	9210	2,653,049	5.8511%	1,005,426	8.2210%	554	6.7801%	6.9507%
PSCo	0012	301427	F.01.03.301427.9210	9210	16,406,637	36.1835%	4,186,309	34.2300%	2,423	29.6537%	33.3557%
SPS	0013	301428	F.01.03.301428.9210	9210	5,994,041	13.2194%	1,918,725	15.6888%	1,177	14.4046%	14.4376%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0069%	-	0.0000%	-	0.0000%	0.0023%
1480 Welton	0029	300020	300020	4171	10,106	0.0223%	4,492	0.0367%	-	0.0000%	0.0197%
PSR Investments	0041	300026	300026	4171	8,821	0.0195%	-	0.0000%	-	0.0000%	0.0065%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0018%	188	0.0015%	-	0.0000%	0.0011%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,342,872	100.0000%	\$ 12,229,934	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Finance & Treasury
SAP ACC 200083

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301441	F.01.03.301441.9210	9210	\$ 20,264,849	44.6925%	\$ 5,114,794	41.8219%	4,017	49.1617%	45.2253%
NSPW	0011	301442	F.01.03.301442.9210	9210	2,653,049	5.8511%	1,005,426	8.2210%	554	6.7801%	6.9507%
NSPco	0012	301443	F.01.03.301443.9210	9210	16,406,637	36.1835%	4,186,309	34.2300%	2,423	29.6537%	33.3557%
SPS	0013	301444	F.01.03.301444.9210	9210	5,994,041	13.2194%	1,918,725	15.6888%	1,177	14.4046%	14.4376%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0069%	-	0.0000%	-	0.0000%	0.0023%
1480 Welton	0029	300020	300020	4171	10,106	0.0223%	4,492	0.0367%	-	0.0000%	0.0197%
PSR Investments	0041	300026	300026	4171	8,821	0.0195%	-	0.0000%	-	0.0000%	0.0065%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0018%	188	0.0015%	-	0.0000%	0.0011%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,342,872	100.0000%	\$ 12,229,934	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Risk Management
SAP ACC 200084

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301477	F.01.03.301477.9210	9210	\$ 20,264,849	44.6925%	\$ 5,114,794	41.8219%	4,017	49.1617%	45.2253%
NSPW	0011	301478	F.01.03.301478.9210	9210	2,653,049	5.8511%	1,005,426	8.2210%	554	6.7801%	6.9507%
PSCo	0012	301479	F.01.03.301479.9210	9210	16,406,637	36.1835%	4,186,309	34.2300%	2,423	29.6537%	33.3557%
SPS	0013	301480	F.01.03.301480.9210	9210	5,994,041	13.2194%	1,918,725	15.6888%	1,177	14.4046%	14.4376%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0069%	-	0.0000%	-	0.0000%	0.0023%
1480 Welton	0029	300020	300020	4171	10,106	0.0223%	4,492	0.0367%	-	0.0000%	0.0197%
PSR Investments	0041	300026	300026	4171	8,821	0.0195%	-	0.0000%	-	0.0000%	0.0065%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0018%	188	0.0015%	-	0.0000%	0.0011%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,342,872	100.0000%	\$ 12,229,934	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Legal
SAP ACC 200086

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301563	F.01.03.301563.9210	9210	\$ 20,264,849	44.6925%	\$ 5,114,794	41.8219%	4,017	49.1617%	45.2253%
NSPW	0011	302044	F.01.03.302044.9210	9210	2,653,049	5.8511%	1,005,426	8.2210%	554	6.7801%	6.9507%
PSCo	0012	300388	F.01.03.300388.9210	9210	16,406,637	36.1835%	4,186,309	34.2300%	2,423	29.6537%	33.3557%
SPS	0013	300390	F.01.03.300390.9210	9210	5,994,041	13.2194%	1,918,725	15.6888%	1,177	14.4046%	14.4376%
Reddy Kilowatt	0017	300010	300010	4171	3,127	0.0069%	-	0.0000%	-	0.0000%	0.0023%
1480 Welton	0029	300020	300020	4171	10,106	0.0223%	4,492	0.0367%	-	0.0000%	0.0197%
PSR Investments	0041	300026	300026	4171	8,821	0.0195%	-	0.0000%	-	0.0000%	0.0065%
WGI	0043	300027	F.01.03.300027.9210	9210	814	0.0018%	188	0.0015%	-	0.0000%	0.0011%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,342,872	100.0000%	\$ 12,229,934	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Accounting - Operating Companies
SAP ACC 200087

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301683	F.01.03.301683.9210	9210	\$ 20,264,849	44.7150%	\$ 5,114,794	41.8379%	4,017	49.1617%	45.2381%
NSPW	0011	301684	F.01.03.301684.9210	9210	2,653,049	5.8540%	1,005,426	8.2242%	554	6.7801%	6.9528%
PSCo	0012	301685	F.01.03.301685.9210	9210	16,406,637	36.2018%	4,186,309	34.2431%	2,423	29.6537%	33.3662%
SPS	0013	301476	F.01.03.301476.9210	9210	5,994,041	13.2260%	1,918,725	15.6948%	1,177	14.4046%	14.4418%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,320,004	100.0000%	\$ 12,225,254	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Accounting, Reporting, Tax, Audit Services - OpCos Electric
SAP ACC 200088
Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	300498	F.01.03.300498.9210	9210	\$ 20,264,849	44.7150%	\$ 5,114,794	41.8379%	4,017	49.1617%	45.2381%
NSPW	0011	300502	F.01.03.300502.9210	9210	2,653,049	5.8540%	1,005,426	8.2242%	554	6.7801%	6.9528%
PSCo	0012	300506	F.01.03.300506.9210	9210	16,406,637	36.2018%	4,186,309	34.2431%	2,423	29.6537%	33.3662%
SPS	0013	300511	F.01.03.300511.9210	9210	5,994,041	13.2260%	1,918,725	15.6948%	1,177	14.4046%	14.4418%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,320,004	100.0000%	\$ 12,225,254	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Audit Services - OpCos
SAP ACC 200089

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301425	F.01.03.301425.9210	9210	\$ 20,264,849	44.7150%	\$ 5,114,794	41.8379%	4,017	49.1617%	45.2381%
NSPW	0011	301426	F.01.03.301426.9210	9210	2,653,049	5.8540%	1,005,426	8.2242%	554	6.7801%	6.9528%
PSCo	0012	301427	F.01.03.301427.9210	9210	16,406,637	36.2018%	4,186,309	34.2431%	2,423	29.6537%	33.3662%
SPS	0013	301428	F.01.03.301428.9210	9210	5,994,041	13.2260%	1,918,725	15.6948%	1,177	14.4046%	14.4418%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,320,004	100.0000%	\$ 12,225,254	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Risk Management - OpCos
SAP ACC 200090

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301477	F.01.03.301477.9210	9210	\$ 20,264,849	44.7150%	\$ 5,114,794	41.8379%	4,017	49.1617%	45.2381%
NSPW	0011	301478	F.01.03.301478.9210	9210	2,653,049	5.8540%	1,005,426	8.2242%	554	6.7801%	6.9528%
PSCo	0012	301479	F.01.03.301479.9210	9210	16,406,637	36.2018%	4,186,309	34.2431%	2,423	29.6537%	33.3662%
SPS	0013	301480	F.01.03.301480.9210	9210	5,994,041	13.2260%	1,918,725	15.6948%	1,177	14.4046%	14.4418%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,320,004	100.0000%	\$ 12,225,254	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Captive Insurance - OpCos
SAP ACC 200091

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301477	F.01.03.301477.9210	9210	\$ 20,264,849	44.7150%	\$ 5,114,794	41.8379%	4,017	49.1617%	45.2381%
NSPW	0011	301478	F.01.03.301478.9210	9210	2,653,049	5.8540%	1,005,426	8.2242%	554	6.7801%	6.9528%
PSCo	0012	301479	F.01.03.301479.9210	9210	16,406,637	36.2018%	4,186,309	34.2431%	2,423	29.6537%	33.3662%
SPS	0013	301480	F.01.03.301480.9210	9210	5,994,041	13.2260%	1,918,725	15.6948%	1,177	14.4046%	14.4418%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,320,004	100.0000%	\$ 12,225,254	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Corporate Strategy & Business Development
SAP ACC 200092

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301585	F.01.03.301585.9210	9210	\$ 20,264,849	44.7150%	\$ 5,114,794	41.8379%	4,017	49.1617%	45.2381%
NSPW	0011	301586	F.01.03.301586.9210	9210	2,653,049	5.8540%	1,005,426	8.2242%	554	6.7801%	6.9528%
PSCo	0012	301589	F.01.03.301589.9210	9210	16,406,637	36.2018%	4,186,309	34.2431%	2,423	29.6537%	33.3662%
SPS	0013	301590	F.01.03.301590.9210	9210	5,994,041	13.2260%	1,918,725	15.6948%	1,177	14.4046%	14.4418%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,320,004	100.0000%	\$ 12,225,254	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Legal - OpCos
SAP ACC 200093

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301563	F.01.03.301563.9210	9210	\$ 20,264,849	44.7150%	\$ 5,114,794	41.8379%	4,017	49.1617%	45.2381%
NSPW	0011	302044	F.01.03.302044.9210	9210	2,653,049	5.8540%	1,005,426	8.2242%	554	6.7801%	6.9528%
PSCo	0012	300388	F.01.03.300388.9210	9210	16,406,637	36.2018%	4,186,309	34.2431%	2,423	29.6537%	33.3662%
SPS	0013	300390	F.01.03.300390.9210	9210	5,994,041	13.2260%	1,918,725	15.6948%	1,177	14.4046%	14.4418%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,320,004	100.0000%	\$ 12,225,254	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Supply Chain
SAP ACC 200094

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	300709	F.01.03.300709.9210	9210	\$ 20,264,849	44.7150%	\$ 5,114,794	41.8379%	4,017	49.1617%	45.2381%
NSPW	0011	300712	F.01.03.300712.9210	9210	2,653,049	5.8540%	1,005,426	8.2242%	554	6.7801%	6.9528%
PSCo	0012	300715	F.01.03.300715.9210	9210	16,406,637	36.2018%	4,186,309	34.2431%	2,423	29.6537%	33.3662%
SPS	0013	300716	F.01.03.300716.9210	9210	5,994,041	13.2260%	1,918,725	15.6948%	1,177	14.4046%	14.4418%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,320,004	100.0000%	\$ 12,225,254	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Energy Supply Asset Management
SAP ACC 200095

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	300923	F.01.03.3000923.9210	9210	\$ 20,264,849	44.7150%	\$ 5,114,794	41.8379%	4,017	49.1617%	45.2381%
NSPW	0011	300926	F.01.03.300926.9210	9210	2,653,049	5.8540%	1,005,426	8.2242%	554	6.7801%	6.9528%
PSCo	0012	300929	F.01.03.300929.9210	9210	16,406,637	36.2018%	4,186,309	34.2431%	2,423	29.6537%	33.3662%
SPS	0013	300933	F.01.03.300933.9210	9210	5,994,041	13.2260%	1,918,725	15.6948%	1,177	14.4046%	14.4418%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,320,004	100.0000%	\$ 12,225,254	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Energy Markets - Business Services
SAP ACC 200096

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301667	F.01.03.301667.9210	9210	\$ 20,264,849	44.7150%	\$ 5,114,794	41.8379%	4,017	49.1617%	45.2381%
NSPW	0011	301527	F.01.03.301527.9210	9210	2,653,049	5.8540%	1,005,426	8.2242%	554	6.7801%	6.9528%
PSCo	0012	301463	F.01.03.301463.9210	9210	16,406,637	36.2018%	4,186,309	34.2431%	2,423	29.6537%	33.3662%
SPS	0013	301464	F.01.03.301464.9210	9210	5,994,041	13.2260%	1,918,725	15.6948%	1,177	14.4046%	14.4418%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,320,004	100.0000%	\$ 12,225,254	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Accounting and Finance Software Applications Maintenance

SAP ACC 200097 Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	301673	F.01.03.301673.9210	9210	\$ 20,264,849	44.7150%	\$ 5,114,794	41.8379%	4,017	49.1617%	45.2381%
NSPW	0011	301674	F.01.03.301674.9210	9210	2,653,049	5.8540%	1,005,426	8.2242%	554	6.7801%	6.9528%
PSCo	0012	301675	F.01.03.301675.9210	9210	16,406,637	36.2018%	4,186,309	34.2431%	2,423	29.6537%	33.3662%
SPS	0013	301676	F.01.03.301676.9210	9210	5,994,041	13.2260%	1,918,725	15.6948%	1,177	14.4046%	14.4418%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.9210	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.9210	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.9210	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,320,004	100.0000%	\$ 12,225,254	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Transm Elec FERC 566
SAP ACC 200098

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	300125	F.01.03.300125.5660	5660	\$ 20,264,849	44.7150%	\$ 5,114,794	41.8379%	4,017	49.1617%	45.2381%
NSPW	0011	300127	F.01.03.300127.5660	5660	2,653,049	5.8540%	1,005,426	8.2242%	554	6.7801%	6.9528%
PSCo	0012	300129	F.01.03.300129.5660	5660	16,406,637	36.2018%	4,186,309	34.2431%	2,423	29.6537%	33.3662%
SPS	0013	300131	F.01.03.300131.5660	5660	5,994,041	13.2260%	1,918,725	15.6948%	1,177	14.4046%	14.4418%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.5660	5660	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.5660	5660	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.5660	5660	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,320,004	100.0000%	\$ 12,225,254	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Elec Dist FERC 588
SAP ACC 200099

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	302058	F.01.03.302058.5880	5880	\$ 20,264,849	44.7150%	\$ 5,114,794	41.8379%	4,017	49.1617%	45.2381%
NSPW	0011	300174	F.01.03.300174.5880	5880	2,653,049	5.8540%	1,005,426	8.2242%	554	6.7801%	6.9528%
PSCo	0012	300360	F.01.03.300360.5880	5880	16,406,637	36.2018%	4,186,309	34.2431%	2,423	29.6537%	33.3662%
SPS	0013	300370	F.01.03.300370.5880	5880	5,994,041	13.2260%	1,918,725	15.6948%	1,177	14.4046%	14.4418%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.5880	5880	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.5880	5880	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.5880	5880	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,320,004	100.0000%	\$ 12,225,254	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Elec Dist FERC 588 South
SAP ACC 200103

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
PSCo	0012	300360	F.01.03.300360.5880	5880	\$ 16,406,637	73.2417%	\$ 4,186,309	68.5714%	2,423	67.3056%	69.7062%
SPS	0013	300370	F.01.03.300370.5880	5880	\$ 5,994,041	26.7583%	\$ 1,918,725	31.4286%	1,177	32.6944%	30.2938%
Total					\$ 22,400,678	100.0000%	\$ 6,105,034	100.0000%	3,600	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Accounting, Reporting Tax - PSCo, SPS

SAP ACC 200104

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
PSCo	0012	301685	F.01.03.301685.9210	9210	\$ 16,406,637	73.2417%	\$ 4,186,309	68.5714%	2,423	67.3056%	69.7062%
SPS	0013	301476	F.01.03.301476.9210	9210	\$ 5,994,041	26.7583%	\$ 1,918,725	31.4286%	1,177	32.6944%	30.2938%
Total					\$ 22,400,678	100.0000%	\$ 6,105,034	100.0000%	3,600	100.0000%	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Passport - Accounts Payable

SAP ACC 200110

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of AP Transactions	Allocation %
NSPM	0010	301673	F:01.03.301673.9210	9210	463,450	34.6461%
NSPW	0011	301674	F:01.03.301674.9210	9210	81,305	6.0781%
PSCo	0012	301675	F:01.03.301675.9210	9210	622,357	46.5256%
SPS	0013	301676	F:01.03.301676.9210	9210	170,524	12.7479%
United Power & Land	0019	300012	300012	4171	15	0.0011%
Xcel Energy WYCO Inc.	0038	300025	300025	4171	6	0.0004%
PSR Investment	0041	300026	300026	4171	6	0.0004%
WGI	0043	300027	F:01.03.300027.9210	9210	4	0.0003%
Chippewa Flambeau	0057	300031	300031	4171	1	0.0001%
Total					1,337,668	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

EAI (Enterprise Application Integration)
SAP ACC 200111

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	General Ledger Avg %	Mercury Int Avg %	CBS-ALS-CFM Avg %	GIS-Dist Avg %	OMS Avg %	Design Tool Avg %
NSPM	0010	301403	F:01.03.301403.5060	5060						
NSPM	0010	301404	F:01.03.301404.5390	5390						
NSPM	0010	301405	F:01.03.301405.5490	5490						
NSPM	0010	302058	F:01.03.302058.5880	5880				18.0875%	18.0875%	22.6196%
NSPM	0010	300344	F:01.03.300344.8510	8510						
NSPM	0010	300344	F:01.03.300344.8710	8710						
NSPM	0010	300344	F:01.03.300344.8800	8800				13.8488%	13.8488%	14.8956%
NSPM	0010	300585	F:01.03.300585.9020	9020						
NSPM	0010	300575	F:01.03.300575.9030	9030						
NSPM	0010	301673	F:01.03.301673.9210	9210	40.2360%	40.2360%	45.2381%			
NSPW	0011	301682	F:01.03.301682.5060	5060						
NSPW	0011	301073	F:01.03.301073.5390	5390						
NSPW	0011	301073	F:01.03.301073.5490	5490						
NSPW	0011	300174	F:01.03.300174.5880	5880				4.1008%	4.1008%	
NSPW	0011	300175	F:01.03.300175.8710	8710						
NSPW	0011	300175	F:01.03.300175.8800	8800				3.5138%	3.5138%	
NSPW	0011	301567	F:01.03.301567.9020	9020						
NSPW	0011	301575	F:01.03.301575.9030	9030						
NSPW	0011	301674	F:01.03.301674.9210	9210	6.2266%	6.2266%	6.9528%			
PSCo	0012	301132	F:01.03.301132.4171	4171						
PSCo	0012	300929	F:01.03.300929.5060	5060						
PSCo	0012	301145	F:01.03.301145.5060	5060						
PSCo	0012	300967	F:01.03.300967.5390	5390						
PSCo	0012	300929	F:01.03.300929.5490	5490						
PSCo	0012	300360	F:01.03.300360.5880	5880				21.8945%	21.8945%	27.3804%
PSCo	0012	300074	F:01.03.300074.8510	8510						
PSCo	0012	300361	F:01.03.300361.8710	8710						
PSCo	0012	300361	F:01.03.300361.8800	8800				32.6374%	32.6374%	35.1044%
PSCo	0012	300591	F:01.03.300591.9020	9020						
PSCo	0012	300581	F:01.03.300581.9030	9030						
PSCo	0012	301675	F:01.03.301675.9210	9210	29.3117%	29.3117%	33.3662%			
SPS	0013	300933	F:01.03.300933.5060	5060						
SPS	0013	300370	F:01.03.300370.5880	5880				5.9172%	5.9172%	
SPS	0013	300592	F:01.03.300592.9020	9020						
SPS	0013	300582	F:01.03.300582.9030	9030						
SPS	0013	301676	F:01.03.301676.9210	9210	12.8764%	12.8764%	14.4418%			
Eloigne	0015	300009	300009	4171	0.0823%	0.0823%				
Reddy Kilowatt	0017	300010	300010	4171	0.0017%	0.0017%				
United Power & Land	0019	300012	300012	4171	0.0006%	0.0006%				
Xcel Energy	0023	300014	300014	4171	10.9736%	10.9736%				
1480 Wellton	0029	300020	300020	4171	0.0168%	0.0168%				
Xcel Energy WYCO Inc.	0038	300025	300025	4171	0.1002%	0.1002%				
PSR Investment	0041	300026	300026	4171	0.0048%	0.0048%				
WGI	0043	300027	F:01.03.300027.9210	9210	0.0009%	0.0009%				

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

EAI (Enterprise Application Integration)
SAP ACC 200111

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Gas Scada Avg %	Business Obj Avg %	IVR Avg %	Peoplesoft Avg %	Time Avg %	HR Systems Avg %	Maximo Avg %
NSPM	0010	301403	F:01.03.301403.5060	5060							30.2863%
NSPM	0010	301404	F:01.03.301404.5390	5390							0.1219%
NSPM	0010	301405	F:01.03.301405.5490	5490							5.3016%
NSPM	0010	302058	F:01.03.302058.5880	5880							
NSPM	0010	300344	F:01.03.300344.8510	8510	4.4944%						
NSPM	0010	300344	F:01.03.300344.8710	8710	13.8488%						
NSPM	0010	300344	F:01.03.300344.8800	8800							
NSPM	0010	300585	F:01.03.300585.9020	9020							
NSPM	0010	300575	F:01.03.300575.9030	9030			33.7680%				
NSPM	0010	301673	F:01.03.301673.9210	9210		46.9862%		49.0896%	49.0896%		
NSPW	0011	301682	F:01.03.301682.5060	5060							3.7782%
NSPW	0011	301073	F:01.03.301073.5390	5390							3.2907%
NSPW	0011	301073	F:01.03.301073.5490	5490							0.3047%
NSPW	0011	300174	F:01.03.300174.5880	5880							
NSPW	0011	300175	F:01.03.300175.8710	8710	3.5138%						
NSPW	0011	300175	F:01.03.300175.8800	8800							
NSPW	0011	301567	F:01.03.301567.9020	9020							
NSPW	0011	301575	F:01.03.301575.9030	9030			6.3786%				
NSPW	0011	301674	F:01.03.301674.9210	9210		5.3699%		6.7701%	6.7701%	6.7801%	
PSCo	0012	301132	F:01.03.301132.4171	4171							0.7313%
PSCo	0012	300929	F:01.03.300929.5060	5060							29.0677%
PSCo	0012	301145	F:01.03.301145.5060	5060							0.6094%
PSCo	0012	300967	F:01.03.300967.5390	5390							1.7063%
PSCo	0012	300929	F:01.03.300929.5490	5490							1.9500%
PSCo	0012	300360	F:01.03.300360.5880	5880							
PSCo	0012	300074	F:01.03.300074.8510	8510	45.5056%						
PSCo	0012	300361	F:01.03.300361.8710	8710	32.6374%						
PSCo	0012	300361	F:01.03.300361.8800	8800							
PSCo	0012	300591	F:01.03.300591.9020	9020							
PSCo	0012	300581	F:01.03.300581.9030	9030			44.4488%				
PSCo	0012	301675	F:01.03.301675.9210	9210		37.2603%		29.6102%	29.6102%	29.6537%	
SFS	0013	300933	F:01.03.300933.5060	5060							
SFS	0013	300370	F:01.03.300370.5880	5880							
SFS	0013	300592	F:01.03.300592.9020	9020							
SFS	0013	300582	F:01.03.300582.9030	9030							
SFS	0013	301676	F:01.03.301676.9210	9210		10.3836%		14.3835%	14.3835%	14.4046%	
Eloigne	0015	300009	300009	4171							
Rddy Kilowatt	0017	300010	300010	4171							
United Power & Land	0019	300012	300012	4171							
Xcel Energy	0023	300014	300014	4171							
1480 Welton	0029	300020	300020	4171				0.1466%	0.1466%		
Xcel Energy WYCO Inc.	0038	300025	300025	4171							
PSR Investment	0041	300026	300026	4171							
WGI	0043	300027	F:01.03.300027.9210	9210							

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

EAI (Enterprise Application Integration)
SAP_ACC 200111

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	MDMS Avg %	MRAS Avg %	CRS Avg %	Passport Avg %	PowerPlan Avg %	Allocation %
NSPM	0010	301403	F:01.03.301403.5060	5060						1.6826%
NSPM	0010	301404	F:01.03.301404.5390	5390						0.0068%
NSPM	0010	301405	F:01.03.301405.5490	5490						0.2945%
NSPM	0010	302058	F:01.03.302058.5880	5880						3.2664%
NSPM	0010	300344	F:01.03.300344.8510	8510						0.2497%
NSPM	0010	300344	F:01.03.300344.8710	8710						0.7694%
NSPM	0010	300344	F:01.03.300344.8800	8800						2.3663%
NSPM	0010	300585	F:01.03.300585.9020	9020	35.7297%	35.7297%				3.9700%
NSPM	0010	300575	F:01.03.300575.9030	9030			34.7489%			3.8065%
NSPM	0010	301673	F:01.03.301673.9210	9210				34.6286%	43.4140%	22.1153%
NSPW	0011	301682	F:01.03.301682.5060	5060						0.2099%
NSPW	0011	301073	F:01.03.301073.5390	5390						0.1828%
NSPW	0011	301073	F:01.03.301073.5490	5490						0.0169%
NSPW	0011	300174	F:01.03.300174.5880	5880						0.4556%
NSPW	0011	300175	F:01.03.300175.8710	8710						0.1952%
NSPW	0011	300175	F:01.03.300175.8800	8800						0.3904%
NSPW	0011	301567	F:01.03.301567.9020	9020	6.7147%	6.7147%				0.7461%
NSPW	0011	301575	F:01.03.301575.9030	9030			6.5466%			0.7181%
NSPW	0011	301674	F:01.03.301674.9210	9210				7.2495%	6.3186%	3.2591%
PSCo	0012	301132	F:01.03.301132.4171	4171						0.0406%
PSCo	0012	300929	F:01.03.300929.5060	5060						1.6149%
PSCo	0012	301145	F:01.03.301145.5060	5060						0.0339%
PSCo	0012	300967	F:01.03.300967.5390	5390						0.0948%
PSCo	0012	300929	F:01.03.300929.5490	5490						0.1083%
PSCo	0012	300360	F:01.03.300360.5880	5880						3.9539%
PSCo	0012	300074	F:01.03.300074.8510	8510						2.5281%
PSCo	0012	300361	F:01.03.300361.8710	8710						1.8132%
PSCo	0012	300361	F:01.03.300361.8800	8800						5.5766%
PSCo	0012	300591	F:01.03.300591.9020	9020	50.7590%	50.7590%				5.6399%
PSCo	0012	300581	F:01.03.300581.9030	9030			47.6039%			5.1140%
PSCo	0012	301675	F:01.03.301675.9210	9210				44.6314%	36.4399%	16.6220%
SPS	0013	300933	F:01.03.300933.5060	5060						1.2696%
SPS	0013	300370	F:01.03.300370.5880	5880						0.6575%
SPS	0013	300592	F:01.03.300592.9020	9020	6.7966%	6.7966%				0.7552%
SPS	0013	300582	F:01.03.300582.9030	9030			11.1006%			1.4725%
SPS	0013	301676	F:01.03.301676.9210	9210				13.4885%	13.8275%	6.7259%
Eloigne	0015	300009	300009	4171						0.0091%
Reddy Kilowatt	0017	300010	300010	4171				0.0000%		0.0002%
United Power & Land	0019	300012	300012	4171				0.0006%		0.0001%
Xcel Energy	0023	300014	300014	4171						1.2356%
I480 Welton	0029	300020	300020	4171				0.0002%		0.0019%
Xcel Energy WYCO Inc.	0038	300025	300025	4171				0.0003%		0.0112%
PSR Investment	0041	300026	300026	4171				0.0003%		0.0006%
WGI	0043	300027	F:01.03.300027.9210	9210				0.0004%		0.0001%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Mainframe Charges From IBM
SAP ACC 200112

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	TIME/PTRS Avg %	GMS Avg %	MDMS Avg %	Allocation %
NSPM	0010	300344	F:01.03.300344.8660	8660		0.0017%		0.0006%
NSPM	0010	300585	F:01.03.300585.9020	9020			35.7297%	11.9099%
NSPM	0010	301673	F:01.03.301673.9210	9210	49.0896%			16.3632%
NSPW	0011	300175	F:01.03.300175.8800	8800		7.5906%		2.5302%
NSPW	0011	301567	F:01.03.301567.9020	9020			6.7147%	2.2382%
NSPW	0011	301674	F:01.03.301674.9210	9210	6.7701%			2.2567%
PSCo	0012	300074	F:01.03.300074.8660	8660		0.4972%		0.1657%
PSCo	0012	300361	F:01.03.300361.8800	8800		91.9105%		30.6368%
PSCo	0012	300591	F:01.03.300591.9020	9020			50.7590%	16.9197%
PSCo	0012	301675	F:01.03.301675.9210	9210	29.6102%			9.8701%
SPS	0013	300592	F:01.03.300592.9020	9020			6.7966%	2.2655%
SPS	0013	301676	F:01.03.301676.9210	9210	14.3835%			4.7945%
Xcel Energy	0023	300014	300014	4171	0.1466%			0.0489%
Total					100.0000%	100.0000%	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Miscellaneous Applications
SAP ACC 200115

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	JDE Avg %	Mercury Int Avg %	CBS-ALS-CFM Avg %	Flipper Avg %	Altra Power Avg %	PCI Avg %	OMS Avg %
NSPM	0010	301403	F:01.03.301403.5060	5060							
NSPM	0010	301404	F:01.03.301404.5390	5390							
NSPM	0010	301405	F:01.03.301405.5490	5490							
NSPM	0010	300734	F:01.03.300734.5560	5560							
NSPM	0010	300125	F:01.03.300125.5612	5612							
NSPM	0010	300125	F:01.03.300125.5810	5810							18.0875%
NSPM	0010	302058	F:01.03.302058.5880	5880							
NSPM	0010	300344	F:01.03.300344.8510	8510							
NSPM	0010	300344	F:01.03.300344.8660	8660							
NSPM	0010	300344	F:01.03.300344.8710	8710							13.8488%
NSPM	0010	300585	F:01.03.300585.9020	9020							
NSPM	0010	300575	F:01.03.300575.9030	9030	40.2360%	40.2360%	45.2381%	45.2381%	45.2381%	45.2381%	
NSPM	0011	301682	F:01.03.301682.5060	5060							
NSPM	0011	301073	F:01.03.301073.5390	5390							
NSPM	0011	301073	F:01.03.301073.5490	5490							
NSPM	0011	300737	F:01.03.300737.5560	5560							
NSPM	0011	300127	F:01.03.300127.5612	5612							
NSPM	0011	300127	F:01.03.300127.5810	5810							
NSPM	0011	300174	F:01.03.300174.5880	5880							4.1008%
NSPM	0011	300175	F:01.03.300175.8710	8710							
NSPM	0011	300175	F:01.03.300175.8800	8800							3.5138%
NSPM	0011	301567	F:01.03.301567.9020	9020							
NSPM	0011	301575	F:01.03.301575.9030	9030							
NSPM	0012	301132	F:01.03.301132.4171	4171	6.2266%	6.2266%	6.9528%	6.9528%	6.9528%	6.9528%	
PSCo	0012	300929	F:01.03.300929.5060	5060							
PSCo	0012	301145	F:01.03.301145.5060	5060							
PSCo	0012	300967	F:01.03.300967.5390	5390							
PSCo	0012	300929	F:01.03.300929.5490	5490							
PSCo	0012	300738	F:01.03.300738.5560	5560							
PSCo	0012	300129	F:01.03.300129.5612	5612							
PSCo	0012	300129	F:01.03.300129.5810	5810							21.8945%
PSCo	0012	300360	F:01.03.300360.5880	5880							
PSCo	0012	300074	F:01.03.300074.8510	8510							
PSCo	0012	300074	F:01.03.300074.8660	8660							
PSCo	0012	300361	F:01.03.300361.8710	8710							
PSCo	0012	300361	F:01.03.300361.8800	8800							32.6374%
PSCo	0012	300591	F:01.03.300591.9020	9020							
PSCo	0012	300581	F:01.03.300581.9030	9030							
PSCo	0012	301675	F:01.03.301675.9210	9210	29.3117%	29.3117%	33.3662%	33.3662%	33.3662%	33.3662%	
SPS	0013	300933	F:01.03.300933.5060	5060							
SPS	0013	300741	F:01.03.300741.5560	5560							
SPS	0013	300131	F:01.03.300131.5612	5612							
SPS	0013	300131	F:01.03.300131.5810	5810							
SPS	0013	300370	F:01.03.300370.5880	5880							5.9172%
SPS	0013	300592	F:01.03.300592.9020	9020							
SPS	0013	300582	F:01.03.300582.9030	9030							
SPS	0013	301676	F:01.03.301676.9210	9210	12.8764%	12.8764%	14.4418%	14.4418%	14.4418%	14.4418%	
Elofigne	0015	300009	300009	4171	0.0823%	0.0823%					
Reddy Kilowatt	0017	300010	300010	4171	0.0017%	0.0017%					

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Distribution Electric FERC 580 (E&S)

SAP ACC 200116

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Gross Electric Dist Plant \$000	Allocation %
NSPM	0010	302058	F.01.03.302058.5800	5800	\$ 4,030,699	36.1750%
NSPW	0011	300174	F.01.03.300174.5800	5800	913,836	8.2016%
PSCo	0012	300360	F.01.03.300360.5800	5800	4,879,066	43.7890%
SPS	0013	300370	F.01.03.300370.5800	5800	1,318,612	11.8344%
Total					\$ 11,142,213	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Transmission Electric FERC 586

SAP ACC 200117

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Gross Electric Dist Plant \$000	Allocation %
NSPM	0010	302058	F.01.03.302058.5860	5860	\$ 4,030,699	36.1750%
NSPW	0011	300174	F.01.03.300174.5860	5860	913,836	8.2016%
PSCo	0012	300360	F.01.03.300360.5860	5860	4,879,066	43.7890%
SPS	0013	300370	F.01.03.300370.5860	5860	1,318,612	11.8344%
Total					\$ 11,142,213	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

EMS Distribution - FERC 581

SAP ACC 200118

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Gross Electric Dist Plant \$000	Allocation %
NSPM	0010	300125	F.01.03.300125.5810	5810	\$ 4,030,699	36.1750%
NSPW	0011	300127	F.01.03.300127.5810	5810	913,836	8.2016%
PSCo	0012	300129	F.01.03.300129.5810	5810	4,879,066	43.7890%
SPS	0013	300131	F.01.03.300131.5810	5810	1,318,612	11.8344%
Total					\$ 11,142,213	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Distribution Software Systems
SAP ACC 200119

Legal Entity	Utility Dist	Company	Final Cost Center	FERCLET	FERC Account	Gross Electric Dist Plant \$000	%	Gross Gas Dist Plant \$000	%	Allocation %
NSPM	Electric Dist	0010	302058	F:01.03.302058.5880	5880	\$ 4,030,699	36.1750%		0.0000%	18.0875%
NSPM	Gas Dist	0010	300344	F:01.03.300344.8800	8800		0.0000%	\$ 1,119,683	27.6977%	13.8488%
NSPW	Electric Dist	0011	300174	F:01.03.300174.5880	5880	913,836	8.2016%		0.0000%	4.1008%
NSPW	Gas Dist	0011	300175	F:01.03.300175.8800	8800		0.0000%	284,091	7.0276%	3.5138%
PSCo	Electric Dist	0012	300360	F:01.03.300360.5880	5880	4,879,066	43.7890%		0.0000%	21.8945%
PSCo	Gas Dist	0012	300361	F:01.03.300361.8800	8800		0.0000%	2,638,745	65.2748%	32.6374%
SPS	Electric Dist	0013	300370	F:01.03.300370.5880	5880	1,318,612	11.8344%		0.0000%	5.9172%
Total						\$ 11,142,213	100.0000%	\$ 4,042,519	100.0000%	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Elec Dist, Gas Dist, & Gas Trans FERC 588, 880, 859

SAP ACC 200121

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Utility Dist	Gross Electric Dist Plant \$000	Gross Gas Trans Plant \$000	Gross Gas Dist Plant \$000	Combined Gross Plant \$000's	Allocation %
NSPM	0010	302058	F.01.03.302058.5880	5880	Electric Dist	\$ 4,030,699			\$ 4,030,699	24.8145%
NSPM	0010	300344	F.01.03.300344.8590	8590	Gas Trans		\$ 95,156		\$ 95,156	0.5858%
NSPM	0010	300344	F.01.03.300344.8800	8800	Gas Dist			\$ 1,119,683	\$ 1,119,683	6.8932%
NSPW	0011	300174	F.01.03.300174.5880	5880	Electric Dist	913,836			913,836	5.6259%
NSPW	0011	300175	F.01.03.300175.8800	8800	Gas Dist			284,091	284,091	1.7490%
PSCo	0012	300360	F.01.03.300360.5880	5880	Electric Dist	4,879,066			4,879,066	30.0373%
PSCo	0012	300074	F.01.03.300074.8590	8590	Gas Trans		963,445		963,445	5.9313%
PSCo	0012	300361	F.01.03.300361.8800	8800	Gas Dist			2,638,745	2,638,745	16.2451%
SPS	0013	300370	F.01.03.300370.5880	5880	Electric Dist	1,318,612			1,318,612	8.1179%
Total						\$ 11,142,213	\$ 1,058,601	\$ 4,042,519	\$ 16,243,333	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Transmission Electric FERC 560 (E&S)

SAP ACC 200122

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Gross Electric Trans Plant \$000	Allocation %
NSPM	0010	300125	F.01.03.300125.5600	5600	\$ 3,563,564	35.7331%
NSPW	0011	300127	F.01.03.300127.5600	5600	1,160,669	11.6384%
PSCo	0012	300129	F.01.03.300129.5600	5600	2,300,825	23.0711%
SPS	0013	300131	F.01.03.300131.5600	5600	2,947,682	29.5574%
Total					\$ 9,972,740	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Transmission Electric FERC 561.5

SAP ACC 200123

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Gross Electric Trans Plant \$000	Allocation %
NSPM	0010	300125	F.01.03.300125.5615	5615	\$ 3,563,564	35.7331%
NSPW	0011	300127	F.01.03.300127.5615	5615	1,160,669	11.6384%
PSCo	0012	300129	F.01.03.300129.5615	5615	2,300,825	23.0711%
SPS	0013	300131	F.01.03.300131.5615	5615	2,947,682	29.5574%
Total					\$ 9,972,740	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

EMS-Transmission (Energy Management System-SCADA)

SAP ACC 200124 Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Gross Electric Trans Plant \$000	Allocation %
NSPM	0010	300125	F.01.03.300125.5612	5612	\$ 3,563,564	35.7331%
NSPW	0011	300127	F.01.03.300127.5612	5612	1,160,669	11.6384%
PSCo	0012	300129	F.01.03.300129.5612	5612	2,300,825	23.0711%
SPS	0013	300131	F.01.03.300131.5612	5612	2,947,682	29.5574%
Total					\$ 9,972,740	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Utilities Group Administrative & General (A&G) FERC 921

SAP ACC 200126

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Combined Gross Delivery Plant \$000's	Allocation %
NSPM	0010	300348	F.01.03.300348.9210	9210	\$ 8,809,102	33.6018%
NSPW	0011	300358	F.01.03.300358.9210	9210	2,358,596	8.9968%
PSCo	0012	300363	F.01.03.300363.9210	9210	10,782,081	41.1278%
SPS	0013	300289	F.01.03.300289.9210	9210	4,266,294	16.2736%
Total					\$ 26,216,073	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Payment and Reporting

SAP ACC 200132

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Invoice Transactions	Allocation %
NSPM	0010	300709	F.01.03.300709.9210	9210	170,140	33.0983%
NSPW	0011	300712	F.01.03.300712.9210	9210	30,831	5.9977%
PSCo	0012	300715	F.01.03.300715.9210	9210	262,852	51.1340%
SPS	0013	300716	F.01.03.300716.9210	9210	50,219	9.7694%
PSR Investments	0041	300026	300026	4171	3	0.0006%
Total					514,045	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Proprietary Trading - Back Office

SAP ACC 200133

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Allocation %
NSPM	0010	301457	F.01.03.301457.9210	9210	43.6220%
PSCo	0012	301461	F.01.03.301461.9210	9210	34.0514%
SPS	0013	301464	F.01.03.301464.9210	9210	22.3266%
Total					100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Prop Trading - Front/Mid Office

SAP ACC 200134

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Allocation %
NSPM	0010	300734	F.01.03.300734.5570	5570	43.6220%
PSCo	0012	300738	F.01.03.300738.5570	5570	34.0514%
SPS	0013	300741	F.01.03.300741.5570	5570	22.3266%
Total					100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages
 Energy Supply Business Resources
 SAP ACC 200135

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	MWH Generation 000's	Allocation %
NSPM	0010	300923	F.01.03.300923.9210	9210	21,342,523	36.4859%
NSPW	0011	300926	F.01.03.300926.9210	9210	1,408,965	2.4087%
PSCo	0012	300929	F.01.03.300929.9210	9210	22,903,224	39.1540%
SPS	0013	300933	F.01.03.300933.9210	9210	12,840,530	21.9514%
Total					58,495,242	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Energy Markets - Fuel

SAP ACC 200136

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	MWH Generation 000's	Allocation %
NSPM	0010	301667	F.01.03.301667.9210	9210	21,342,523	36.4859%
NSPW	0011	301527	F.01.03.301527.9210	9210	1,408,965	2.4087%
PSCo	0012	301463	F.01.03.301463.9210	9210	22,903,224	39.1540%
SPS	0013	301464	F.01.03.301464.9210	9210	12,840,530	21.9514%
Total					58,495,242	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Energy Supply Miscellaneous Power Expense OpCo's
SAP ACC 200137

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Generation Type	Total ES MWH Generation	Allocation %
NSPM	0010	301403	F.01.03.301403.5060	5060	Steam Gen	13,575,752	23.2083%
NSPM	0010	301404	F.01.03.301404.5390	5390	Hydro Gen	73,681	0.1260%
NSPM	0010	301405	F.01.03.301405.5490	5490	Other Gen	7,693,090	13.1517%
NSPW	0011	301682	F.01.03.301682.5060	5060	Steam Gen	233,732	0.3996%
NSPW	0011	301073	F.01.03.301073.5390	5390	Hydro Gen	1,101,361	1.8828%
NSPW	0011	301073	F.01.03.301073.5490	5490	Other Gen	73,872	0.1263%
PSCo	0012	300929	F.01.03.300929.5060	5060	Steam Gen	14,294,068	24.4362%
PSCo	0012	300967	F.01.03.300967.5390	5390	Hydro Gen	460,897	0.7879%
PSCo	0012	300929	F.01.03.300929.5490	5490	Other Gen	8,148,260	13.9298%
SPS	0013	300933	F.01.03.300933.5060	5060	Steam Gen	12,387,520	21.1770%
SPS	0013	300933	F.01.03.300933.5490	5490	Other Gen	453,010	0.7744%
Total						58,495,243	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Energy Supply Operations Management OPCo's

SAP ACC 200138 Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Generation Type	Total ES MWH Generation	Allocation %
NSPM	0010	301403	F.01.03.301403.5000	5000	Steam Gen	13,575,752	23.2083%
NSPM	0010	301404	F.01.03.301404.5350	5350	Hydro Gen	73,681	0.1260%
NSPM	0010	301405	F.01.03.301405.5460	5460	Other Gen	7,693,090	13.1517%
NSPW	0011	301682	F.01.03.301682.5000	5000	Steam Gen	233,732	0.3996%
NSPW	0011	301073	F.01.03.301073.5350	5350	Hydro Gen	1,101,361	1.8828%
NSPW	0011	301073	F.01.03.301073.5460	5460	Other Gen	73,872	0.1263%
PSCo	0012	300929	F.01.03.300929.5000	5000	Steam Gen	14,294,068	24.4362%
PSCo	0012	300967	F.01.03.300967.5350	5350	Hydro Gen	460,897	0.7879%
PSCo	0012	300929	F.01.03.300929.5460	5460	Other Gen	8,148,260	13.9298%
SPS	0013	300933	F.01.03.300933.5000	5000	Steam Gen	12,387,520	21.1770%
SPS	0013	300933	F.01.03.300933.5460	5460	Other Gen	453,010	0.7744%
Total						58,495,243	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

ES Engineering and Construction

SAP ACC 200139 Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Generation Type	Total ES MWH Generation	Allocation %
NSPM	0010	301403	F.01.03.301403.5100	5100	Steam Gen	13,575,752	23.2083%
NSPM	0010	301404	F.01.03.301404.5410	5410	Hydro Gen	73,681	0.1260%
NSPM	0010	301405	F.01.03.301405.5510	5510	Other Gen	7,693,090	13.1517%
NSPW	0011	301682	F.01.03.301682.5100	5100	Steam Gen	233,732	0.3996%
NSPW	0011	301073	F.01.03.301073.5410	5410	Hydro Gen	1,101,361	1.8828%
NSPW	0011	301073	F.01.03.301073.5510	5510	Other Gen	73,872	0.1263%
PSCo	0012	300929	F.01.03.300929.5100	5100	Steam Gen	14,294,068	24.4362%
PSCo	0012	300967	F.01.03.300967.5410	5410	Hydro Gen	460,897	0.7879%
PSCo	0012	300929	F.01.03.300929.5510	5510	Other Gen	8,148,260	13.9298%
SPS	0013	300933	F.01.03.300933.5100	5100	Steam Gen	12,387,520	21.1770%
SPS	0013	300933	F.01.03.300933.5510	5510	Other Gen	453,010	0.7744%
Total						58,495,243	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

ES Operations Performance

SAP ACC 200140 Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Generation Type	Total ES MWH Generation	Allocation %
PSCo	0012	300929	F.01.03.300929.5060	5060	Steam Gen	14,294,068	39.9904%
PSCo	0012	300967	F.01.03.300967.5390	5390	Hydro Gen	460,897	1.2894%
PSCo	0012	300929	F.01.03.300929.5490	5490	Other Gen	8,148,260	22.7963%
SPS	0013	300933	F.01.03.300933.5060	5060	Steam Gen	12,387,520	34.6565%
SPS	0013	300933	F.01.03.300933.5490	5490	Other Gen	453,010	1.2674%
Total						35,743,755	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

ES Operations Management South

SAP ACC 200141 Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Generation Type	Total ES MWH Generation	Allocation %
PSCo	0012	300929	F.01.03.300929.5000	5000	Steam Gen	14,294,068	39.9904%
PSCo	0012	300967	F.01.03.300967.5350	5350	Hydro Gen	460,897	1.2894%
PSCo	0012	300929	F.01.03.300929.5460	5460	Other Gen	8,148,260	22.7963%
SPS	0013	300933	F.01.03.300933.5000	5000	Steam Gen	12,387,520	34.6565%
SPS	0013	300933	F.01.03.300933.5460	5460	Other Gen	453,010	1.2674%
Total						35,743,755	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

ES Engineering and Construction PSCo and SPS

SAP ACC 200142 Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Generation Type	Total ES MWH Generation	Allocation %
PSCo	0012	300929	F.01.03.300929.5100	5100	Steam Gen	14,294,068	39.9904%
PSCo	0012	300967	F.01.03.300967.5410	5410	Hydro Gen	460,897	1.2894%
PSCo	0012	300929	F.01.03.300929.5510	5510	Other Gen	8,148,260	22.7963%
SPS	0013	300933	F.01.03.300933.5100	5100	Steam Gen	12,387,520	34.6565%
SPS	0013	300933	F.01.03.300933.5510	5510	Other Gen	453,010	1.2674%
Total						35,743,755	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages
Energy Markets - Regulated Trading
SAP ACC 200146

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total MWh Hour Sales 000's	Allocation %
NSPM	0010	301457	F.01.03.301457.9210	9210	40,544,049	37.6090%
NSPW	0011	301459	F.01.03.301459.9210	9210	6,727,741	6.2407%
PSCo	0012	301461	F.01.03.301461.9210	9210	33,467,674	31.0450%
SPS	0013	301464	F.01.03.301464.9210	9210	27,064,448	25.1053%
Total					107,803,912	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Business Objects

SAP ACC 200147

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Business Objects users	Allocation %
NSPM	0010	301673	F.01.03.301673.9210	9210	1,715	46.9862%
NSPW	0011	301674	F.01.03.301674.9210	9210	196	5.3699%
PSCo	0012	301675	F.01.03.301675.9210	9210	1,360	37.2603%
SPS	0013	301676	F.01.03.301676.9210	9210	379	10.3836%
Total					3,650	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Business Systems
SAP ACC 200148

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Computers	Allocation %
NSPM	0010	301673	F.01.03.301673.9210	9210	5,366	50.2952%
NSPW	0011	301674	F.01.03.301674.9210	9210	685	6.4205%
PSCo	0012	301675	F.01.03.301675.9210	9210	3,135	29.3842%
SPS	0013	301676	F.01.03.301676.9210	9210	1,483	13.9001%
Total					10,669	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	No. of Computers	%	No. of Customers Excluding Wholesale	%	No. of Employees	%	Allocation %
NSPM	0010	301673	F:01:03:301673:9210	9210	5,366	50.2952%	1,977,445	35.4602%	4,017	49.1617%	44.9723%
NSPW	0011	301674	F:01:03:301674:9210	9210	685	6.4205%	371,459	6.6611%	554	6.7801%	6.6206%
PSCo	0012	301675	F:01:03:301675:9210	9210	3,135	29.3842%	2,837,810	50.8885%	2,423	29.6537%	36.6421%
SPS	0013	301676	F:01:03:301676:9210	9210	1,483	13.9001%	389,811	6.9902%	1,177	14.4046%	11.7650%
Total					10,669	100.0000%	5,576,525	100.0000%	8,171	100.0000%	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages
IVR (Interactive Voice Response)
SAP ACC 200150

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Contacts	Allocation %
NSPM	0010	300575	F.01.03.300575.9030	9030	1,621,158	33.7680%
NSPW	0011	301575	F.01.03.301575.9030	9030	306,227	6.3786%
PSCo	0012	300581	F.01.03.300581.9030	9030	2,133,929	44.4488%
SFS	0013	300582	F.01.03.300582.9030	9030	739,556	15.4046%
Total					4,800,870	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Customer Billing FERC 903

SAP ACC 200151

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Customer Bills	Allocation %
NSPM	0010	300605	F.01.03.300605.9030	9030	1,489,477	39.5408%
NSPW	0011	301567	F.01.03.301567.9030	9030	256,421	6.8071%
PSCo	0012	300611	F.01.03.300611.9030	9030	1,697,588	45.0655%
SPS	0013	302046	F.01.03.302046.9030	9030	323,451	8.5866%
Total					3,766,937	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Customer Care 902

SAP ACC 200152

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Customers	Allocation %
NSPM	0010	300585	F.01.03.300585.9020	9020	1,977,479	35.4164%
NSPW	0011	301567	F.01.03.301567.9020	9020	370,908	6.6429%
PSCo	0012	300591	F.01.03.300591.9020	9020	2,845,308	50.9591%
SPS	0013	300592	F.01.03.300592.9020	9020	389,818	6.9816%
Total					5,583,513	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Customer Safety Advertising/Information Costs

SAC APP 200153

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Customers Excluding Wholesale	Allocation %
NSPM	0010	300426	F.01.03.300426.9210	9210	1,977,445	35.4602%
NSPW	0011	300429	F.01.03.300429.9210	9210	371,459	6.6611%
PSCo	0012	300432	F.01.03.300432.9210	9210	2,837,810	50.8885%
SPS	0013	300433	F.01.03.300433.9210	9210	389,811	6.9902%
Total					5,576,525	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Customer Service IT FERC 903

SAP ACC 200154

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Customers Excluding Wholesale	Allocation %
NSPM	0010	300575	F.01.03.300575.9030	9030	1,977,445	35.4602%
NSPW	0011	301575	F.01.03.301575.9030	9030	371,459	6.6611%
PSCo	0012	300581	F.01.03.300581.9030	9030	2,837,810	50.8885%
SPS	0013	300582	F.01.03.300582.9030	9030	389,811	6.9902%
Total					5,576,525	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Customer Care (CC) 903

SAP ACC 200155

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Customers Excluding Wholesale	Allocation %
NSPM	0010	300555	F.01.03.300555.9030	9030	1,977,445	35.4602%
NSPW	0011	301567	F.01.03.301567.9030	9030	371,459	6.6611%
PSCo	0012	300561	F.01.03.300561.9030	9030	2,837,810	50.8885%
SPS	0013	300562	F.01.03.300562.9030	9030	389,811	6.9902%
Total					5,576,525	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Customer Care 901

SAP ACC 200156

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Customers Excluding Wholesale	Allocation %
NSPM	0010	300605	F.01.03.300605.9010	9010	1,977,445	35.4602%
NSPW	0011	301567	F.01.03.301567.9010	9010	371,459	6.6611%
PSCo	0012	300611	F.01.03.300611.9010	9010	2,837,810	50.8885%
SPS	0013	300612	F.01.03.300612.9010	9010	389,811	6.9902%
Total					5,576,525	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Customer Service IT FERC 903 - South

SAP ACC 200157

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Customers Excluding Wholesale	Allocation %
PSCo	0012	300581	F.01.03.300581.9030	9030	2,837,810	87.9227%
SPS	0013	300582	F.01.03.300582.9030	9030	389,811	12.0773%
Total					3,227,621	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Customer Care 903 - South

SAP ACC 200158

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Customers Excluding Wholesale	Allocation %
PSCo	0012	300561	F.01.03.300561.9030	9030	2,837,810	87.9227%
SPS	0013	300562	F.01.03.300562.9030	9030	389,811	12.0773%
Total					3,227,621	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Customer Care Low Income Assistance (908)
SAP ACC 200161

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Residential Customers	%	No. of Low Income Customer Calls	%	Allocation %
NSPM	0010	300565	F.01.03.300565.9080	9080	1,769,821	36.0101%	55,092	43.4678%	39.7390%
NSPW	0011	301567	F.01.03.301567.9080	9080	317,536	6.4608%	8,191	6.4627%	6.4618%
PSCo	0012	300615	F.01.03.300615.9080	9080	2,521,537	51.3051%	47,276	37.3010%	44.3029%
SPS	0013	300582	F.01.03.300582.9080	9080	305,896	6.2240%	16,183	12.7685%	9.4963%
Total					4,914,790	100.0000%	126,742	100.0000%	100.0000%

CL/QM (Call Logging and Quality Management)

Effective: April 1, 2018 - March 31, 2019

SAP ACC 200162

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Customers Excluding Wholesale	%	No. of Contacts	%	Allocation %
NSPM	0010	300575	F:01.03.300575.9030	9030	1,977,445	35.4602%	1,621,158	33.7680%	34.6141%
NSPW	0011	301575	F:01.03.301575.9030	9030	371,459	6.6611%	306,227	6.3786%	6.5198%
PSCo	0012	300581	F:01.03.300581.9030	9030	2,837,810	50.8885%	2,133,929	44.4488%	47.6687%
SPS	0013	300582	F:01.03.300582.9030	9030	389,811	6.9902%	739,556	15.4046%	11.1974%
Total					5,576,525	100.0000%	4,800,870	100.0000%	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Employee Communications

SAP ACC 200163

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Employees	Allocation %
NSPM	0010	301392	F.01.03.301392.9210	9210	4,017	49.0896%
NSPW	0011	301393	F.01.03.301393.9210	9210	554	6.7701%
PSCo	0012	301394	F.01.03.301394.9210	9210	2,423	29.6102%
SPS	0013	301395	F.01.03.301395.9210	9210	1,177	14.3835%
Xcel Energy	0023	300014	300014	4171	12	0.1466%
Total					8,183	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Payroll
SAP ACC 200164 **Effective: April 1, 2018 - March 31, 2019**

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Employees	Allocation %
NSPM	0010	300416	F.01.03.300416.9210	9210	4,017	49.0896%
NSPW	0011	300419	F.01.03.300419.9210	9210	554	6.7701%
PSCo	0012	300422	F.01.03.300422.9210	9210	2,423	29.6102%
SPS	0013	300423	F.01.03.300423.9210	9210	1,177	14.3835%
Xcel Energy	0023	300014	300014	4171	12	0.1466%
Total					8,183	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages
 Employee Management Systems
 SAP ACC 200165

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Employees	Allocation %
NSPM	0010	301673	F.01.03.301673.9210	9210	4,017	49.0896%
NSPW	0011	301674	F.01.03.301674.9210	9210	554	6.7701%
PSCo	0012	301675	F.01.03.301675.9210	9210	2,423	29.6102%
SPS	0013	301676	F.01.03.301676.9210	9210	1,177	14.3835%
Xcel Energy	0023	300014	300014	4171	12	0.1466%
Total					8,183	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Human Resources (Diversity/Safety/Employee Relations)

SAP ACC 200166 Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Employees	Allocation %
NSPM	0010	300416	F.01.03.300416.9210	9210	4,017	49.1616%
NSPW	0011	300419	F.01.03.300419.9210	9210	554	6.7801%
PSCo	0012	300422	F.01.03.300422.9210	9210	2,423	29.6537%
SPS	0013	300423	F.01.03.300423.9210	9210	1,177	14.4046%
Total					8,171	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

e-Business

SAP ACC 200167

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Employees	Allocation %
NSPM	0010	301673	F.01.03.301673.9210	9210	4,017	49.1616%
NSPW	0011	301674	F.01.03.301674.9210	9210	554	6.7801%
PSCo	0012	301675	F.01.03.301675.9210	9210	2,423	29.6537%
SPS	0013	301676	F.01.03.301676.9210	9210	1,177	14.4046%
Total					8,171	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Energy Supply Systems

SAP ACC 200169

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of WAMES Users	%	U5 %	Allocation %
NSPM	0010	301403	F.01.03.301403.5060	5060	586	35.7099%	84.8123%	30.2863%
NSPM	0010	301404	F.01.03.301404.5390	5390			0.3413%	0.1219%
NSPM	0010	301405	F.01.03.301405.5490	5490			14.8464%	5.3016%
NSPW	0011	301682	F.01.03.301682.5060	5060	121	7.3736%	51.2397%	3.7782%
NSPW	0011	301073	F.01.03.301073.5390	5390			44.6281%	3.2907%
NSPW	0011	301073	F.01.03.301073.5490	5490			4.1322%	0.3047%
PSCo	0012	301132	F.01.03.301132.4171	4171	559	34.0646%	2.1467%	0.7313%
PSCo	0012	300929	F.01.03.300929.5060	5060			85.3310%	29.0677%
PSCo	0012	301145	F.01.03.301145.5060	5060			1.7889%	0.6094%
PSCo	0012	300967	F.01.03.300967.5390	5390			5.0089%	1.7063%
PSCo	0012	300929	F.01.03.300929.5490	5490			5.7245%	1.9500%
SPS	0013	300933	F.01.03.300933.5060	5060	375	22.8519%	100.0000%	22.8519%
Total					1,641	100.0000%		100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages
 Meter Reading and Monitoring Systems
 SAP ACC 200170

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Meters	Allocation %
NSPM	0010	300585	F.01.03.300585.9020	9020	2,012,203	35.7297%
NSPW	0011	301567	F.01.03.301567.9020	9020	378,153	6.7147%
PSCo	0012	300591	F.01.03.300591.9020	9020	2,858,609	50.7590%
SPS	0013	300592	F.01.03.300592.9020	9020	382,766	6.7966%
Total					5,631,731	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

CRS (Customer Resource System)

SAP ACC 200171

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Meters	%	No. of Contacts	%	Allocation %
NSPM	0010	300575	F:01.03.300575.9030	9030	2,012,203	35.7297%	1,621,158	33.7680%	34.7489%
NSPW	0011	301575	F:01.03.301575.9030	9030	378,153	6.7147%	306,227	6.3786%	6.5466%
PSCo	0012	300581	F:01.03.300581.9030	9030	2,858,609	50.7590%	2,133,929	44.4488%	47.6039%
SPS	0013	300582	F:01.03.300582.9030	9030	382,766	6.7966%	739,556	15.4046%	11.1006%
Total					5,631,731	100.0000%	4,800,870	100.0000%	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Network
SAP ACC 200172 Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	No. of Phones	%	No. of Radios	%	No. of Computers	%	Allocation %
NSPM	0010	301673	F:01.03.301673.9210	9210	12,228	48.8788%	2,450	45.2030%	5,366	50.2952%	48.1256%
NSPW	0011	301674	F:01.03.301674.9210	9210	2,695	10.7727%	610	11.2546%	685	6.4205%	9.4826%
PSCo	0012	301675	F:01.03.301675.9210	9210	7,008	28.0130%	1,650	30.4428%	3,135	29.3842%	29.2800%
SPS	0013	301676	F:01.03.301676.9210	9210	3,086	12.3356%	710	13.0996%	1,483	13.9001%	13.1118%
Total					25,017	100.0000%	5,420	100.0000%	10,669	100.0000%	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Generation/Proprietary Trading - Back Office

SAP ACC 200173

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Allocation %
NSPM	0010	301457	F.01.03.301457.9210	9210	39.2006%
NSPW	0011	301459	F.01.03.301459.9210	9210	1.7904%
PSCo	0012	301461	F.01.03.301461.9210	9210	37.1489%
SPS	0013	301464	F.01.03.301464.9210	9210	21.8601%
Total					100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Generation/Proprietary Trading - Mid Office

SAP ACC 200174 Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Allocation %
NSPM	0010	300734	F.01.03.300734.5570	5570	40.9910%
PSCo	0012	300738	F.01.03.300738.5570	5570	37.1489%
SPS	0013	300741	F.01.03.300741.5570	5570	21.8601%
Total					100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Passport - Purchasing
SAP ACC 200175
Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Passport Purchasing Transactions	Allocation %
NSPM	0010	301673	F.01.03.301673.9210	9210	95,692	27.7555%
NSPW	0011	301674	F.01.03.301674.9210	9210	20,157	5.8465%
PSCo	0012	301675	F.01.03.301675.9210	9210	200,898	58.2704%
SPS	0013	301676	F.01.03.301676.9210	9210	28,007	8.1234%
Reddy Kilowatt	0017	300010	300010	4171	1	0.0003%
1480 Welton	0029	300020	300020	4171	5	0.0015%
WGI	0043	300027	F.01.03.300027.9210	9210	5	0.0015%
Chippewa Flambeau	0057	300031	300031	4171	3	0.0009%
Total					344,768	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Marketing & Sales

SAP ACC 200176

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Revenues \$000's	Allocation %
NSPM	0010	300575	F:01.03.300575.9210	9210	\$ 5,114,794	41.8379%
NSPW	0011	301575	F:01.03.301575.9210	9210	1,005,426	8.2242%
PSCo	0012	300581	F:01.03.300581.9210	9210	4,186,309	34.2431%
SPS	0013	302046	F:01.03.302046.9210	9210	1,918,725	15.6948%
Total					\$ 12,225,254	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Rates & Regulation - Electric

SAP ACC 200177

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Direct Labor \$\$ Rates & Regulation	Allocation %
NSPM	0010	300833	F.01.03.300833.9210	9210	\$ 1,325,407	15.3490%
NSPW	0011	300673	F.01.03.300673.9210	9210	191,322	2.2156%
PSCo	0012	300812	F.01.03.300812.9210	9210	5,810,574	67.2898%
SPS	0013	300815	F.01.03.300815.9210	9210	1,307,850	15.1456%
Total					\$ 8,635,153	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Rates & Regulation

SAP ACC 200178

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Direct Labor \$\$ Rates & Regulation	Allocation %
NSPM	0010	300808	F.01.03.300808.9210	9210	\$ 1,325,407	15.3490%
NSPW	0011	300811	F.01.03.300811.9210	9210	191,322	2.2156%
PSCo	0012	300814	F.01.03.300814.9210	9210	5,810,574	67.2898%
SPS	0013	300815	F.01.03.300815.9210	9210	1,307,850	15.1456%
Total					\$ 8,635,153	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Passport - All Modules
SAP ACC 200179 **Effective: April 1, 2018 - March 31, 2019**

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total No. of Passport Transactions	Allocation %
NSPM	0010	301673	F.01.03.301673.9210	9210	819,746	34.6286%
NSPW	0011	301674	F.01.03.301674.9210	9210	171,613	7.2495%
PSCo	0012	301675	F.01.03.301675.9210	9210	1,056,540	44.6314%
SPS	0013	301676	F.01.03.301676.9210	9210	319,307	13.4885%
Reddy Kilowatt	0017	300010	300010	4171	1	0.0000%
United Power & Land	0019	300012	300012	4171	15	0.0006%
1480 Welton	0029	300020	300020	4171	5	0.0002%
Xcel Energy WYCO inc.	0038	300025	300025	4171	6	0.0003%
PSR Investment	0041	300026	300026	4171	6	0.0003%
WGI	0043	300027	F.01.03.300027.9210	9210	9	0.0004%
Chippewa Flambeau	0057	300031	300031	4171	4	0.0002%
Total					2,367,252	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

EMS-Shared (Energy Management System-SCADA)
SAP ACC 200180 Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Gross Electric Prod Plant \$000	%	Gross Electric Trans Plant \$000	%	Gross Electric Dist Plant \$000	%	Average %	U5 %	Allocation %
NSPM	0010	300734	F:01.03.300734.5560	5560	\$ 8,800,161	51.5071%	\$ 3,563,564	35.7330%	\$ 4,030,699	36.1750%	41.1384%	3,292.3%	1.3544%
NSPM	0010	300125	F:01.03.300125.5612	5612								59,396.5%	24.4347%
NSPM	0010	300125	F:01.03.300125.5810	5810								37,311.2%	15.3492%
NSPW	0011	300737	F:01.03.300737.5560	5560					913,836	8.2016%	7.5918%	3,207.7%	0.2435%
NSPW	0011	300127	F:01.03.300127.5612	5612								66,902.0%	5.0791%
NSPW	0011	300127	F:01.03.300127.5810	5810								29,890.3%	2.2692%
PSCo	0012	300738	F:01.03.300738.5560	5560	5,621,562	32.9029%	2,300,825	23.0711%	4,879,066	43.7890%	33.2543%	2,024.9%	0.6734%
PSCo	0012	300129	F:01.03.300129.5612	5612								28,500.8%	9.4778%
SPS	0013	300741	F:01.03.300741.5560	5560								69,474.3%	23.1032%
SPS	0013	300131	F:01.03.300131.5612	5612								1,880.9%	0.3389%
SPS	0013	300131	F:01.03.300131.5810	5810								71,156.3%	12.8191%
Total					\$ 17,085,327	100.0000%	\$ 9,972,740	100.0000%	\$ 11,142,213	100.0000%	100.0000%	26,962.8%	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Energy Supply Environmental Policy & Services OPCo's
SAP ACC 200181 Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Gross Electric Prod Plant \$000	Gross Electric Trans Plant \$000	Gross Electric Dist Plant \$000	Gross Gas Trans Plant \$000	Gross Gas Dist Plant \$000	Combined Gross Plat \$000's	Allocation %
NSPM	0010	301667	F:01.03.301667.9210	9210	\$ 8,800,161	\$ 3,563,564	\$ 4,030,699	\$ 95,156	\$ 1,119,683	\$ 17,609,263	40.6668%
NSPW	0011	301527	F:01.03.301527.9210	9210	\$ 501,526	\$ 1,160,569	\$ 913,836	-	\$ 284,091	\$ 2,860,122	6.6051%
PSCo	0012	301463	F:01.03.301463.9210	9210	\$ 5,621,562	\$ 2,300,825	\$ 4,879,066	\$ 963,445	\$ 2,638,745	\$ 16,403,643	37.8825%
SPS	0013	300933	F:01.03.300933.9210	9210	\$ 2,162,078	\$ 2,947,682	\$ 1,318,612	-	-	\$ 6,428,372	14.8456%
Total					\$ 17,085,327	\$ 9,972,740	\$ 11,142,213	\$ 1,058,601	\$ 4,042,519	\$ 43,301,400	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Energy Supply Environmental Policy & Services South
SAP ACC 200183 Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Gross Electric Prod Plant \$000	Gross Electric Trans Plant \$000	Gross Electric Dist Plant \$000	Gross Gas Trans Plant \$000	Gross Gas Dist Plant \$000	Combined Gross Plat \$000's	Allocation %
PSCO	0012	301463	F:01.03.301463.9210	9210	\$ 5,621,562	\$ 2,300,825	\$ 4,879,066	\$ 963,445	\$ 2,638,745	\$ 16,403,643	71.8449%
SPS	0013	300933	F:01.03.300933.9210	9210	\$ 2,162,078	\$ 2,947,682	\$ 1,318,612	\$ 963,445	\$ 2,638,745	\$ 6,428,372	28.1551%
Total					\$ 7,783,640	\$ 5,248,507	\$ 6,197,678	\$ 963,445	\$ 2,638,745	\$ 22,832,015	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

PowerPlant

SAP ACC 200184

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERC/LET	FERC Account	Total Plant Assets \$000's	Allocation %
NSPM	0010	301673	F.01.03.301673.9210	9210	\$ 22,345,891	43.4140%
NSPW	0011	301674	F.01.03.301674.9210	9210	3,252,302	6.3186%
PSCo	0012	301675	F.01.03.301675.9210	9210	18,756,242	36.4399%
SPS	0013	301676	F.01.03.301676.9210	9210	7,117,246	13.8275%
Total					\$ 51,471,681	100.0000%

Southwestern Public Service Company

Indirect Allocating Cost Center Methods and Percentages

Passport - Work Management

SAP ACC 200185

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	No. of Passport Work Mgmt Transactions	Allocation %
NSPM	0010	301673	F.01.03.301673.9210	9210	95,541	50.4073%
NSPW	0011	301674	F.01.03.301674.9210	9210	25,081	13.2327%
PSCo	0012	301675	F.01.03.301675.9210	9210	34,925	18.4264%
SPS	0013	301676	F.01.03.301676.9210	9210	33,991	17.9336%
Total					189,538	100.0000%

Southwestern Public Service Company
Indirect Allocating Cost Center Methods and Percentages

Legal - OpCos - Electric
SAP ACC 200805

Effective: April 1, 2018 - March 31, 2019

Legal Entity	Company	Final Cost Center	FERCLET	FERC Account	Total Assets \$000's	%	Total Revenues \$000's	%	No. of Employees	%	Allocation %
NSPM	0010	300377	F.01.03.300377.92.10	9210	\$ 20,264,849	44.7150%	\$ 5,114,794	41.8379%	4,017	49.1617%	45.2381%
NSPW	0011	300381	F.01.03.300381.92.10	9210	2,653,049	5.8540%	1,005,426	8.2242%	554	6.7801%	6.9528%
PSCo	0012	300385	F.01.03.300385.92.10	9210	16,406,637	36.2018%	4,186,309	34.2431%	2,423	29.6537%	33.3662%
SPS	0013	300390	F.01.03.300390.92.10	9210	5,994,041	13.2260%	1,918,725	15.6948%	1,177	14.4046%	14.4418%
Xcel Energy Transmission Holding Co	0075	300039	F.01.03.300039.92.10	9210	754	0.0017%	-	0.0000%	-	0.0000%	0.0006%
Xcel Energy Transmission Development Co	0076	300040	F.01.03.300040.92.10	9210	219	0.0005%	-	0.0000%	-	0.0000%	0.0002%
Xcel Energy Southwest Transmission Co	0077	300041	F.01.03.300041.92.10	9210	455	0.0010%	-	0.0000%	-	0.0000%	0.0003%
Total					\$ 45,320,004	100.0000%	\$ 12,225,254	100.0000%	8,171	100.0000%	100.0000%

XCEL ENERGY SERVICES INC.

POLICIES AND PROCEDURES

December 2018

XCEL ENERGY SERVICES INC.

POLICIES AND PROCEDURES

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INTRODUCTION

Xcel Energy Services Inc. (the “Service Company”) provides Public Service Company of Colorado, Southwestern Public Service Company, Northern States Power Co., a Minnesota corporation, Northern States Power Co., a Wisconsin corporation (collectively, “Operating Companies”; individually as to any of the above entities, “Operating Company”), and other companies within the Xcel Energy, Inc. (“Xcel Energy”) system (referred to as affiliates) with a variety of administrative, management, engineering, construction, and corporate support services. The Service Company is a subsidiary of Xcel Energy, a public utility holding company under the Public Utility Holding Company Act of 2005 (“PUHCA 2005”). In accordance with PUHCA 2005, the Service Company maintains and makes available to regulatory commissions, books, accounts, memoranda and other records as such commission determines are relevant to costs incurred by an Operating Company or affiliate, and necessary or appropriate for the protection of utility customers with respect to jurisdictional rates. These records are retained in accordance with the Federal Energy Regulatory Commission (“FERC”) Schedule of Records and Periods of Retention.

The Service Company provides services in accordance with service agreements, entered into with the Operating Companies and affiliates. The service agreements are administered in accordance with the PUHCA 2005 and FERC’s regulations thereunder. The Service Company utilizes internal orders and cost centers for the purpose of charging costs to the appropriate Operating Companies and affiliates. The use of internal orders and cost centers allows the Service Company to supply accounting records and information to the Operating Companies and affiliates in enough detail to permit them to record and report their costs in accordance with the FERC Uniform System of Accounts and applicable state regulatory requirements.

The major objective of the Service Company is to consolidate support services in order to provide those services to the Operating Companies and affiliates more effectively, efficiently, and economically than each company could provide for itself. To achieve this

result, the Service Company is cost competitive and focused on providing value-added services to all customers. It is the responsibility of each Operating Company or affiliate that desires to pursue alternate sources for services provided by the Service Company to prepare a business case establishing evidence that: 1) it will be more cost effective and efficient for it to obtain such services from an alternative source and 2) proprietary information protection will not be jeopardized. The Operating Company or affiliate must also give the Service Company an opportunity to respond to any specific concerns regarding such services.

ACCOUNTING PROCEDURES

All charges from the Service Company to the Operating Companies and affiliates are at cost. These charges are for services directly related to Service Company functions/activities and employees.

As previously mentioned, the Service Company utilizes internal orders and cost centers for the purpose of directly assigning and allocating costs to the appropriate Operating Companies and affiliates. An internal order is used with each Service Company transaction since the internal order dictates how the costs are to be charged (direct or allocated) among the Operating Companies and affiliates. To the maximum extent possible, costs must be directly assigned.

The Service Company uses the following types of internal orders:

Direct

An internal order that settles directly to an Operating Company or affiliate is used as a settlement method when the service being provided is performed for a specific Operating Company or affiliate. The Operating Company or affiliate specified in the internal order is charged 100% of the costs. For example, if the Service Company Tax Services department is providing tax return preparation or tax advisory services directly to Southwestern Public Service Company, 100% of the costs to provide those services are

direct charged to Southwestern Public Service Company using an internal order that settles directly to Southwestern Public Service Company.

Indirect

An internal order that settles to an Allocating Cost Center is used to charge costs which are of a general nature and cannot be directly attributed to a specific Operating Company or affiliate (indirect costs). The allocation of these indirect costs to the Operating Companies and affiliates is based on the allocation methods described in the Service Company Service Agreements. For example, an internal order and allocating cost center is used for those costs of Tax Services that cannot be specifically identified with a particular company, such as researching IRS rules and regulations, attending departmental meetings, receiving training or performing administrative type tasks that are of a general nature and provide company-wide benefits. The allocating cost center collects the costs through internal orders and is used to allocate these general costs to all the Operating Companies and affiliates that benefit from services provided by the Tax Services department.

The internal orders and allocating cost centers, along with certain other segments of Xcel Energy's accounting string, provides the detailed information necessary to bill the appropriate Operating Companies and affiliates. Certain segments of the accounting string used to record the transaction provide information such as the types of costs, the requesting and responsible cost centers identified on the internal order, the Operating Company or affiliate being charged, and the type of activity being performed.

The Service Company Accounting department is responsible for establishing and administering the allocating cost centers.

OFFLINE ALLOCATIONS

There are certain instances where a direct charge or approved allocation method does not exist or does not result in an accurate assignment of costs to affiliate companies. While this is not the preferred method, in some situations, an offline allocation may be needed.

An offline allocation is the application of an allocation performed before the charge is entered into any financial accounting system.

CONVENIENCE PAYMENTS

The FERC requires all expenditures which do not pertain to the performance of services by the Service Company to be paid directly by the Operating Company or affiliate that requested the work. However, in limited circumstances, the FERC does allow payments to be paid by the Service Company to outside vendors and others on behalf of affiliate companies. Such transactions are called convenience payments. Convenience payment arrangements should only be made when paying one bill provides a tangible cost saving or benefit to affiliate companies. This includes, but is not limited to, business insurance, pensions, employee benefits, and advertising costs. The FERC requires service companies to provide a listing of total convenience payments for each affiliate company in the annual FERC Form No. 60.

If the Service Company is required to make a convenience payment on behalf of the Operating Companies and affiliates in order to achieve system-wide savings, it should be billed through service billing so that it appears on the affiliate's bill.

MERGER AND ACQUISITION COSTS

Costs incurred regarding mergers and acquisitions must be charged to Xcel Energy, the holding company. Costs include, but are not limited to, employee labor and expenses, outside consulting and legal services. These costs are either expensed or deferred on Xcel Energy's books and subject to later restatement if the merger is successful and the restatement is appropriate.

TIME REPORTING

Employees supporting more than one Operating Company or affiliate and managers supporting employees of more than one company are Service Company employees. All

other employees are assigned to the company for which they provide services. Functions/employees requiring bargaining employee contracts (bargaining units) are not part of the Service Company. The Service Company has no bargaining employees.

Every employee of the Service Company must keep track of their time in order to bill the Operating Companies and affiliates accurately. The following guidelines are provided to ensure accurate and efficient time keeping. These guidelines are in compliance with all time reporting corporate policies and are also outlined in the Service Company Training. Please refer to the “Training” section for further details.

- Exempt employees should keep track of their time in one-hour increments on a weekly basis. (Recording time in smaller increments is optional for exempt employees and the decision is made by each department.) Non-exempt employees are required to track time in 1/10 of an hour increments (6 minutes) per the Department of Labor’s Fair Labor Standards Act. Time is recorded directly in the time keeping system. If an employee doesn’t have access to the time keeping system, a time tracking form for your area can be obtained from your timekeeper. If a time tracking form is used, the employee must sign and date the monthly time report or original time sheet.
- The employee’s manager or supervisor must approve in the time keeping system or by signing and dating the monthly time report or original time sheet. Electronic approval of entered time is permissible only if the system has adequate controls to ensure that:
 - time is entered by the timekeeper or employee and the transaction is date-stamped and identifies the person entering it into the system;
 - time entered is approved by the manager or supervisor and is date-stamped and identifies the person approving the transaction (other than the timekeeper or employee entering the time); and
 - Time entered and approved reflects all prior-period adjustments.

Before implementing electronic approvals for time reporting, the following departments must review and approve the process and controls: Service Company Accounting, Audit Services, and Payroll.

- It is recommended that time be entered by the timekeeper on a weekly basis. Regardless of whether time is entered daily or weekly, time must be entered by the payroll cut-off dates.
- Each manager or supervisor should verify that the correct account codes are being used and the correct companies are being billed based on the services rendered by employees and that they agree with what is entered into the payroll system.
- All system-generated time reports or original time sheets (documents that are signed by manager and employee) and supporting documentation must be retained for a minimum of seven years by each department.

In addition to the verification protocol of the timekeeping systems and management approval, Audit Services periodically performs an audit of Service Company employee time reports. A random sample is taken in each business area and analyzed to verify that Service Company employees are tracking and accounting for their time correctly.

SERVICE AGREEMENTS

A Service Agreement is a contract between the Service Company and each Operating Company and affiliate to which the Service Company provides services in accordance with the PUHCA 2005. The Service Agreement details the terms under which services are provided. The Service Company provides general and specialized services at cost to each Operating Company and affiliate, and the services available and the methods for assigning or allocating costs are described in Appendix A of each Service Agreement.

The following describes the information contained in a Service Agreement.

Date	Effective date of the agreement.
Services	Details the service levels available and the commitment to provide those services.
Compensation	Details the billing process, payment schedule, and dispute resolution process.

Terms	Details the terms of the agreement, including termination requirements.
Liability and Indemnification	Details the limitation of liability and indemnification terms.
Miscellaneous	Details miscellaneous information.

The Service Agreement is reviewed and modified, if necessary, on an annual basis or more frequently by the Operating Company and affiliate representative and the Service Company Accounting department. Service Agreement changes require formal regulatory approval by the Minnesota and Wisconsin Commissions based on their respective filing requirements and must be filed in New Mexico within five days of signing. Additionally, Service Agreements in all other jurisdictions are submitted to the respective commissions on an informational basis if necessary.

MONITORING AND CONTROL

The Service Company Accounting department is responsible for reviewing, monitoring and maintaining the allocating cost centers used to charge out indirect costs. The department also ensure that the allocation factors are appropriate, accurate and kept up to date, including ensuring that the revision process is in accordance with applicable federal and state regulations. The Service Company Accounting department is responsible for coordinating the monthly billing process as described in the “Billing, Review and Payment” section.

ALLOCATION STATISTICS UPDATES AND REVISIONS

Allocation statistics are updated annually, or when necessary, to reflect current data and corporate structure (including the formation of, or acquisition of subsidiaries, or the sale or dissolution of subsidiaries). All allocation methods are submitted to the appropriate state or federal regulatory agencies for approval where necessary.

REQUESTING A NEW ALLOCATING COST CENTER

A request for a new allocating cost center may be appropriate when a new service is identified. The following guidelines should be used in determining when a new indirect internal order is appropriate.

1. No existing allocating cost center can be used to allocate the indirect costs in question based on the allocation method that is most appropriate and cost-causative for the new service.
2. No existing allocating cost center distributes costs to the desired Operating Companies and affiliates receiving this new service.
3. No existing allocating cost center distributes costs to the appropriate FERC accounts.
4. There is a specific regulatory requirement to allocate costs in a specific manner regardless of amount for the new service.
5. The new service will be provided on an ongoing basis and its costs are material in nature.

Requests for a new allocating cost center or, for modifications to an existing allocating cost center must be made through the Service Company Accounting department and require an update to the Service Agreements as well as meet the filing requirements noted in the Service Agreement section.

BILLING, REVIEW AND PAYMENT

Service Company charges are billed electronically monthly to the Operating Companies and Affiliates. The electronic details reflect the billing information necessary to identify the costs charged for that month. The Operating Companies and affiliates settlement of the monthly charges is due by the 23rd day of the month following the month the services were performed. Hard copy summary bills are only available upon request.

Financial representatives of the Operating Companies review financial transactions for material discrepancies as part of the monthly variance analysis process. If discrepancies

are found after the final bills are generated, the corrections will be made the following month. Bills can be challenged at any time and corrections, if any, are made in the following month.

INTEREST AND PENALTY CALCULATIONS

Service Company monthly interest expense is allocated using a method that reflects the borrowing needs of the Service Company. Interest expense is allocated using the total Accounts Receivable balance for each Operating Company and affiliate for the prior month as a measurement of the level of service each affiliate receives.

Operating Companies and affiliates with outstanding Accounts Receivable balances on the Service Company greater than 30 days old and more than \$1,000 will be charged a 1% penalty on the outstanding balance in addition to their monthly interest expense. (Note: The amount of penalties assessed reduces the monthly interest amount to be allocated based on total Accounts Receivable balances.)

DISPUTE RESOLUTION PROCEDURES

In the event of a dispute between an Operating Company or affiliate and a Service Company service provider regarding a billing method and/or amount, representatives from the parties involved along with the Service Company Accounting department will meet to discuss the issues. If a resolution cannot be reached, the issue will be referred to each party's executive management for final resolution.

AUDIT SERVICES CONTROL

Audit Services conducts periodic reviews of the Service Company's operating methods to verify that the services provided are authorized, documented and accurately recorded in the Service Company's books and records. Audit Services conducts reviews of the indirect cost allocation methods to ensure that such methods comply with federal and

state regulations, and they also review time reports to validate that they have been properly coded and approved.

The Audit Services Manager establishes audits to be performed, and how the audits are to be carried out, with the Xcel Energy Audit Committee. In addition, the external auditors, Deloitte and Touche LLP, review certain procedures of the Service Company on an annual basis.

FERC FORM NO. 60

The Service Company Accounting department is responsible for preparing the FERC Form No. 60, which is an annual regulatory support requirement under PUCHA 2005 for centralized service companies. The FERC Form No. 60 reports the direct and allocated charges to each affiliate company from Service Company. Charges reported on FERC Form No. 60 are subject to the jurisdiction of the FERC and reviewed by state and federal regulators.

BUDGETING

Managers in the Service Company are responsible for preparing annual budgets in order to provide budget information to the Operating Companies and affiliates. Budget variance reports are generated each month and Service Company management has the primary responsibility for analyzing and explaining cost variances between budget and actual Service Company charges.

TRAINING

As part of the Company's Corporate Compliance Training, all new Service Company employees are required to complete the Service Company Training within 30 days of hire. All Service Company employees are required to take a Service Company Training Refresher Course every other year for ongoing compliance. The training can be accessed

through the LMS catalog, as well as on the Service Company Accounting and Corporate Policy and Procedures XpressNet webpages.

APPLICABILITY

In conclusion, Service Company's Policies and Procedures are monitored, and compliance with these policies, as well as Corporate Accounting Policy 2.1, is enforced. All Service Company services provided and all related transactions are subject to audit both internally and by state and federal commissions.

Any questions concerning the interpretation of, or compliance with, these policies should be referred to the Service Company Accounting department.

These policies apply to all Service Company employees, including all regular, full-time, part-time, and temporary employees.

SHARED ASSETS AGREEMENT

by and between

Southwestern Public Service Company

and

Xcel Energy Services Inc. ("Service Company")

This Agreement is made and entered into as of the 17th day of February 2011 (this "Agreement") by and between Southwestern Public Service Company ("Provider"), on behalf of itself and any subsidiaries it may create in the future, and Xcel Energy Services Inc. ("Client"). Provider and Client are referred to collectively as "Parties" or individually as "Party."

Section 1: Description of Services

Provider will provide Client with use of buildings, office furniture and equipment, and network equipment (the "Subject Property") as more fully described in Exhibit A (the "Use Arrangements"). The descriptions contained in Exhibit A are incorporated herein and made a part hereof.

Section 2: Extent of Agreement

Provider shall provide Client with use of the Subject Property and everything reasonably necessary as contemplated by the Use Arrangement in accordance with the requirements of this Agreement. Client shall use reasonable care in the use of the Subject Property so as not to cause any loss or damage thereto.

Section 3: Term

This Agreement shall be in effect as of the date hereof and shall continue until terminated by the parties as provided herein, upon not less than one year's prior written notice to the other party. This Agreement shall also be subject to termination or modification at any time, without notice, if and to the extent performance under this Agreement may conflict with the requirements of the Public Utility Holding Company Act of 2005 ("Act"). Notwithstanding anything to the contrary herein, the obligation to pay the other party money due under this Agreement shall survive expiration and termination of this Agreement. Further, upon expiration or termination of this Agreement the parties shall cooperate with each other in order to complete all outstanding matters related to this Agreement in a timely and orderly manner.

Section 4: Payment Terms

Use of the Subject Property and all other matters contemplated by the Use Arrangement will be invoiced at cost to the Client. By the twenty-third (23rd) day of each month, Client shall remit to Provider all charges billed to it.

Section 5: Limitation of Liability

In no event shall either Party be liable to the other Party or to any third party for any indirect, incidental, special, consequential, or punitive damages connected with or arising out of this Agreement, whether or not either Party was advised of the possibility of such damages. In no event shall Provider be liable in contract, tort, or otherwise (including negligence, warranty, or strict liability) for amounts in excess of the total of all amounts earned by Provider in connection with this Agreement, whether or not Provider was advised of the possibility of such damages.

Section 6: Warranties

Provider and its successors and assigns, make no WARRANTY OF ANY KIND, EITHER EXPRESSED OR IMPLIED, INCLUDING, BUT NOT LIMITED TO, THE IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE with respect to the Subject Property.

Section 7: Force Majeure

Provider shall not be considered in default under this Agreement or responsible in tort, strict liability, contract or other legal theory to Client for damages of any description for any interruption or failure of service or deficiency in the quality or quantity of the Subject Property, or any other failure if such failure is caused by factors beyond Provider's reasonable control, including without limitation, storm, flood, lightning, earthquake, fire, explosion, equipment failure, civil disturbance, labor dispute, act of God or the public enemy, action of a court or public authority, scheduled or unscheduled withdrawal of facilities from operation for maintenance or repair, or any other cause beyond the reasonable control of Provider; provided, however, that Provider shall use reasonable efforts to remedy or correct any such failure or interruption as soon as reasonably possible.

Section 8: Change in Law

In the event that a change in the laws or regulations applicable to Provider, Client, or this Agreement requires the amendment, modification, or replacement of this Agreement in order to satisfy any federal, state, or local regulatory requirements, the Parties agree to use good faith efforts to negotiate and implement mutually acceptable terms to accomplish such amendment, modification, or replacement.

Section 9: Amendments and Modifications

This Agreement may not be amended, modified, superseded, or waived, in whole or in part, except by a written instrument signed by authorized representatives of each of the Parties. A waiver in one or more instances of any rights under this Agreement shall not constitute a waiver of such rights for other or future instances.

Section 10: Enforceability

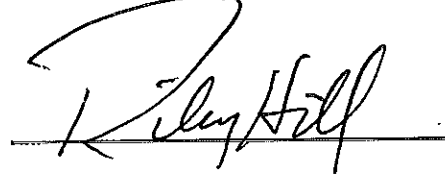
Should any portion of this Agreement be judicially declared invalid, unenforceable, or void, such decision shall not have the effect of invalidating or voiding the remainder of this Agreement, and the Parties hereto agree that the portion or portions of this Agreement so held to be invalid, unenforceable, or void shall be deemed to have been stricken and the remainder shall have the same force and effect as if said portion or portions had never been included herein.

Section 11: Headings

Headings are provided herein for the convenience of the Parties and shall not be construed to explain or modify any part of this Agreement.

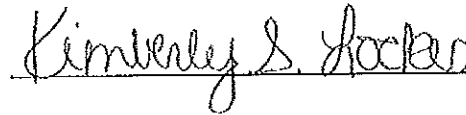
IN WITNESS WHEREOF, each Party hereto has caused this Agreement to be executed by its duly authorized representative as of the day and the year first set forth above.

Southwestern Public Service Company

A handwritten signature in cursive script, reading "Riley Hill", is written over a horizontal line.

By: Riley Hill
Title: President and Chief Executive Officer

Xcel Energy Services Inc.

A handwritten signature in cursive script, reading "Kimberly S. Locker", is written over a horizontal line.

By: Kimberly S. Locker
Title: Director, Service Company Accounting

EXHIBIT A
USE ARRANGEMENT

SPECIFIC PROPERTY

Amarillo Call Center	4701 Parkside Drive Amarillo, TX 79109
Amarillo Tower	600 S. Tyler Street Amarillo, TX 79109
Amarillo Operations Center	6086 W. 48th Avenue Amarillo, TX 79109
Network Equipment	

TYPES OF COSTS

Amortization and Depreciation
Return on Ratebase

ALLOCATION METHODOLOGY

Facilities -- Costs for each facility are charged to Client in total and then allocated between Client and Provider based on the percentage share of labor charges from the Client and Provider employees located in each facility for the prior calendar quarter.

Network Equipment -- Costs are charged to Client in total and then allocated between Client and Provider based on the average of all software allocation percentages.

**FIRST AMENDMENT TO THE SHARED ASSETS AGREEMENT BY
AND BETWEEN SOUTHWESTERN PUBLIC SERVICE COMPANY AND
XCEL ENERGY SERVICES, INC.**

This First Amendment ("First Amendment") to the Shared Services Agreement dated February 17, 2011 ("Agreement") is made as of this 14th day of June 2019, by and between Southwestern Public Service Company, a New Mexico corporation ("Provider"), and Xcel Energy Services, Inc., a Delaware corporation ("Client"). Provider and Client are hereinafter referred to individually as a "Party" and collectively as the "Parties". Unless otherwise noted, capitalized terms used in this First Amendment have the meaning ascribed to them in the Agreement.

WITNESSETH:

WHEREAS, Provider and Client are Parties to the Agreement; and,

WHEREAS, the Parties desire to amend the Agreement to add computer software to the definition of Subject Property and substitute the attached Exhibit A for the Exhibit A currently attached to the Agreement.

NOW THEREFORE, in consideration of the mutual covenants herein contained, the sufficiency and adequacy of which is hereby acknowledged, the Parties agree to the following:

1. Section 1 of the Agreement is amended by adding the phrase “, and computer software” after the word “equipment”.
2. Exhibit A is hereby deleted in its entirety and replaced in its entirety with Exhibit A to this First Amendment.
3. Counterparts. This First Amendment may be executed in counterparts, and each executed counterpart shall have the same force and effect as an original instrument.
4. No Other Amendment. Except as changed hereby, all other terms and conditions of the Agreement remain in full force and effect.

IN WITNESS WHEREOF, the Parties have executed this First Amendment to the Agreement as of the date first set forth above.

[Signatures appear on the next page]

**Southwestern Public Service Company,
a New Mexico corporation**

**Xcel Energy Services, Inc., a Delaware
corporation**



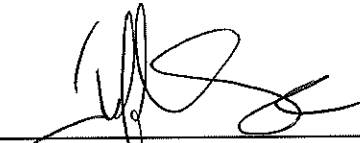
**By: David T. Hudson
Title: President**

**By: Jeffrey S. Savage
Title: Senior Vice President & Controller**

**Southwestern Public Service Company,
a New Mexico corporation**

**Xcel Energy Services, Inc., a Delaware
corporation**

**By: David T. Hudson
Title: President**



**By: Jeffrey S. Savage
Title: Senior Vice President & Controller**

EXHIBIT A
USE ARRANGEMENT

<u>SPECIFIC SUBJECT PROPERTY</u>	<u>CLIENT'S TERM OF USE OF SUBJECT PROPERTY</u>
Amarillo Tower - 600 South Tyler Street, Amarillo, Texas 79109.	From February 17, 2011 through midnight May 31, 2017.
790 Buchanan - 790 Buchanan, Amarillo, TX 79118.	June 1, 2017 until modified by the Parties or termination of this Agreement.
Amarillo Call Center - 4701 Parkside Drive, Amarillo, Texas 79109.	From February 17, 2011 until modified by the Parties termination of this Agreement.
Amarillo Operations Center - 6086 West 48 th Avenue, Amarillo, TX 79109.	From February 17, 2011 until modified by the Parties termination of this Agreement.
Network Equipment	From February 17, 2011 until modified by the Parties termination of this Agreement.
Computer Software	From June 14, 2019 until modified by the Parties termination of this Agreement.

TYPES OF COSTS

Amortization and Depreciation
Return on Rate Base

ALLOCATION METHODOLOGY

Facilities - Costs for each facility are charged to the Client in total and then allocated between the Client and Provider based on the percentage share of employee labor to the Provider based upon the most recent quarter's labor for the specific employees located in each facility.
Network Equipment and Software – Costs are charged to the Client in total and allocated between the Client and Provider using a cost-causative method.