

Xcel Energy/USFWS
Avian Protection Memorandum Of Understanding
Semi-Annual Report
January 31, 2005

Covering July 1, 2004 through December 31, 2004 Reporting Period

On April 19, 2002, Xcel Energy and the USFWS (Service) entered into a Memorandum of Understanding (MOU) to establish procedures and policies to be employed by the Company's operating companies and the Service in dealing with migratory birds that may be present, injured or killed on the Company's property during the period of this MOU.

As part of the agreement, Xcel Energy agreed to file a report three months and two weeks after the date of the execution of this MOU to the Service compiling the information described above in the MOU, which occurred during the initial three-month period. The Company submitted the first report on August 2, 2002. One report is submitted on behalf of all the operating companies that signed the MOU every six months. Since some of the special use permits recently acquired by several of the Xcel operating companies have January 31, 2004 reporting dates, we have moved up the reporting date slightly to accommodate both submittal date requirements. We will now provide reports that cover January 1 through June 30 and July 1 through December 31. The reports will be filed within 30 days of the last day of the reporting period.

1. Status of the Development and Implementation of an Avian Protection Plan (APP)

EDM International, Inc. issued the final draft APP for Xcel Energy operating companies Public Service Company of Colorado (PSCo) and Cheyenne Light Fuel and Power Company (CLFP). The Company submitted the plan to the USFWS staff on April 30, 2004. USFWS Staff gave verbal approval of the APP on June 29, 2004 and written approval on October 28, 2004. (Note: CLFP was sold to Black Hills Corporation on January 21, 2005. Black Hills Corp. will do the future reporting for CLFP).

As reported previously, Xcel Energy has begun developing APP's for its operating companies Northern States Power – Wisconsin (NSPW), Northern States Power – Minnesota (NSPM), and Southwestern Public Service Company (SPS) this year. USFWS staff has been consulted on the approach for the APPs and we have contracted with EDM International, Inc. again to develop the plans.

We expect that the plans will be complete at the end of 2006 or early 2007. As stated in previous reports, regardless of the completion date of the APP's, Xcel Energy will continue to manage issues that arise with electrocutions and collisions that occur as the APP's are developed.

Xcel Energy has implemented a training program for all electric delivery field personnel that may encounter birds. This training program has been underway for almost a year. We are updating the plan this year and are beginning to audit our various offices to determine where we may have gaps in training and awareness for our employees. Xcel Energy is in compliance with Section 4.A. of the other MOUs.

2. Status of Special Purpose Permits

Xcel Energy has special purpose permits for all of the operating companies:

- CLFP (Permit MB793891-0)
- NSPM (Permit MB074020-0)
- NSPW (Permit MB074019-0)
- PSCo (Permit MB702651-1)
- SPS (Permit MB082993-0)

3. Summary of Avian Injuries

| Operating Company | Description | Date | Comments |
|-------------------|------------------|----------|---|
| NSPM | Trumpeter Swan | 10-24-04 | Two dead swans were reported near Rogers. Another injured swan was present when the site was checked the following day. The injured bird was taken to Wildlife Rehab in Roseville. The wing was amputated and the bird, once recovered, was sent to Iowa's captive breeding program. |
| NSPM | Green Herons (2) | 7-14-04 | Tree trimming crew was removing branches from areas around distribution line in Plymouth, MN. A heron nest was on a branch removed and two of the young died and two were injured and taken to the Wildlife Rehabilitation Center in Roseville MN. USFWS contacted on 7-14-04. Xcel Energy reporting measures worked well. Tree trimming crew had taken training. Future training should include all trimming crews and highlight need to look for nests. |
| SPS | Great Horned Owl | 07-07-04 | An injured Great Horned Owl was taken to the South Plains Wildlife Rehabilitation Center in Lubbock. The owl had severely tangled itself in barbed wire at Jones Stations and injured its wing and was probably euthanized |
| SPS | Great Blue Heron | 12-09-04 | Plant Environmentalist took Great Blue Heron at Jones Station to the South Plains Wildlife Rehabilitation Center in Lubbock. The bird was injured by colliding with a power line west of the south lime pond and had to be euthanized by rehab personnel. |

4. Summary of Avian Deaths

The following table summarizes avian deaths that have occurred between July 1 and December 31, 2004. As noted in the introduction section, we are changing our reporting period to correspond with our special purpose permit reporting requirements.

| Operating Company | Description | Date | Comments |
|-------------------|-----------------|---------|--|
| NSPM | 2 Canada Geese | 7-27-04 | In response to an outage reported in Rogers line crew found two dead Canada Geese lying below line near new Kohl's Store. The next day no carcasses could be found. Flappers were installed on the line. |
| NSPM | Red-tailed Hawk | 7-27-04 | Young red-tail was electrocuted on a pole in Belle Plaine MN. No retrofit measures taken at this time. It is unclear how bird was |

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| Operating Company | Description | Date | Comments |
|-------------------|-------------------|----------|--|
| | | | electrocuted. Will assess the pole during the development of APP. |
| NSPM | Trumpeter swan | 9-28-04 | A neighbor reported a swan colliding with a line near Rogers. In response to a reported outage the crew responded but found no dead birds present. No action taken. |
| NSPM | Peregrine Falcons | 10-5-04 | During the biannual inspection of the combustion turbine stack at Black Dog three dead peregrine and one dead pigeon were found. All birds had been dead for some time and were badly desiccated. Two of the birds were banded males from the 2004 nesting at the facility. The other was an unbanded immature female. |
| NSPM | Trumpeter Swans | 10-24-04 | Crews responding to outage call reported two dead swans under line. The following day carcasses were scavenged. An injured swan was also present at that time. See above for notes on injured bird. Measures are underway to mark the lines. |
| NSPM | Cooper's Hawk | 12-16-04 | Hawk was found inside 13 th floor of the Sherco Plant entangled in light wiring. |
| NSPW | Great Blue Heron | 7-7-04 | Body of Great Blue Heron found in Coulee substation, La Crosse Wisconsin. No outage had been reported and carcass was too decomposed to determine cause of death. DNR and USFWS contacted. Site will be monitored for possible issues. |
| NSPM | Green Herons (2) | 7-14-04 | Tree trimming crew was removing branches from areas around distribution line in Plymouth, MN. A heron nest was on a branch removed and two of the young died and two were injured and taken to the Wildlife Rehabilitation Center in Roseville MN. USFWS contacted on 7-14-04. |
| SPS | Harris Hawk | 08-25-04 | Received an email from Delivan Roper of USFW based out of Albuquerque informing Xcel Energy of a Harris Hawk electrocution in Loving, New Mexico. The hawk was injured, retrieved by a rehabilitator, but eventually euthanized due to the extent of its injuries. Retrofits were completed on four structures in the immediate area on 08-26. The modifications included a single transformer structure, a 3-phase capacitor bank structure, and 2 three-phase transformer bank structures, at a cost of \$1004.82 structure. |
| SPS | Sandhill Crane | 09-08-04 | Xcel Energy reported a Sandhill Crane electrocution near Elkhart, Kansas. The actual location was 3 miles west of Kansas HYW 27 on County Road D. No outage occurred during the incident. The structure is currently being evaluated for retrofit. |
| SPS | Red Tailed Hawk | 09-23-04 | The electrocution occurred on a OCR structure, specifically OCR 130-3. The OCR is on circuit 1320, a 13.2KV circuit out of Spring Creek Substation, located east of Borger, Texas in Hutchinson County. The hawk appears to have tried landing on one of the jumpers going down from the primary conductors to the OCR, as one of its claws was wrapped around the jumper, before it was knocked off the equipment. The incident resulted in a 12-hour outage. The structure is currently being evaluated for retrofit. |
| SPS | Turkey Vulture | 10-07-04 | The Turkey Vulture was electrocuted on a transformer pole in Idalou, Texas. The electrocution resulted in a 1 hour and 3 minute outage. The structure is currently being evaluated for retrofit. |
| SPS | Ferruginous Hawk | 11-15-04 | Hawk was discovered electrocuted during an outage. The electrocution occurred east of Hwy 119 and Hwy 281 on the side of Sunray, Texas, by the railroad tracks. Specifically, the OCR 302-2 was damaged and will need repair. Installing bushing & cable insulation covers at a cost of \$1200 modified the structure. |

| Operating Company | Description | Date | Comments |
|-------------------|-----------------------|----------|--|
| SPS | Great Horned Owls (2) | 11-17-04 | Owls were discovered electrocuted on one of Xcel Energy's distribution lines during a one-hour outage. The owls were on an 8' crossarm on a pole that had a distribution transformer on it. The circuit involved was 13.2 KV circuit #1416, which originates at Industrial Substation, just west of Berger. The birds had to be removed from the crossarm, so that electric service could be restored to customers affected by the outages. The structure is currently being evaluated for retrofit. |
| SPS | Red Tailed Hawk | 12-01-04 | Hawk was discovered electrocuted at a transformer bank during a one-hour outage in Moore County. The structure is currently being evaluated for retrofit. |
| CLF&P | 2 Hawks | 8-30-04 | Two hawks were electrocuted on a transformer pole outside of the Hilltop Substation. No outage was reported. The transformer was retrofitted. |
| PSCo | American Crow | 9-12-04 | The crow was electrocuted on a transformer pole at 318 E. 1 st St. in Parachute Colorado. This resulted in a 116-minute outage. The transformer had a cap on the transformer bushing. This cap was replaced with a cover to provide greater animal protection. |
| PSCo | Great Horned Owl | 10-11-04 | The owl was found at the base of a capacitor bank in the Weld Substation. No outage was reported. An investigation was performed and no action will be taken at this time. The entire capacitor bank would need to be retrofitted. The technology to perform such a task is not known. If this area becomes a problem for avian electrocution, a new investigation will be performed. |
| PSCo | Barn Owl | 10-01-04 | The owl was found electrocuted at the base of a transformer pole near the intersection of Weld County Roads 33 and 40. No outage was reported. The transformer is scheduled to be retrofitted. |
| PSCo | Red-Tailed Hawk | 10-22-04 | The hawk was found electrocuted at the base of a transformer pole along 4 th Ave near the town of Timnath, Colorado. No outage was reported. The structure is scheduled to be retrofitted. |
| PSCo | Great Horned Owl | 10-29-04 | The owl was found at the base of a tangent structure at 515 Lincoln St. in Sterling, Colorado. This resulted in a 50-minute outage. The structure is scheduled to be retrofitted. |

5. Summary of Migratory Bird Nest Removals

A. Active Migratory Bird Nests Non-Emergency Removals

None have been reported.

B. Active Nests Of Non-Endangered/Threatened, Non-eagle Migratory Birds—Emergency Removals

None have been reported

C. Inactive Nests of Non-listed, Non-eagle Migratory Birds —Emergency Removal

With the new FWS policy (Memorandum (MBPM-2) issued April 15 2003) for removal of inactive

nests of non-listed, non-eagle migratory birds, Xcel Energy will no longer report these activities in this report. We will continue to work with the appropriate state agencies as necessary.

D. Endangered/Threatened Migratory Bird Nest Removals

No removals for this reporting period.

6. Eagle Permits

No requests have been filed.

7. Summary of Record-Keeping Procedures

Each contact for the operating companies is coordinating contacts and reports. Once the special purpose permits are acquired, final procedures will be completed. All biannual reports submitted to USFWS are kept on a shared folder for the Company.

8. Next Report Date

The next report will be submitted to the Service within 30 days following June 30, 2005.

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