



March 30, 2005

L-PI-05-023  
10 CFR 140.21

U S Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555

Monticello Nuclear  
Generating Plant  
Docket 50-263  
License No. DPR-22

Prairie Island Nuclear  
Generating Plant Units 1 and 2  
Dockets 50-282 and 50-306  
License Nos. DPR-42 and DPR-60

Guarantee Of Payment Of Deferred Premiums

Title 10 CFR 140.21 and item 154 of Regulatory Guide 10.1 Rev 4 require each licensee to provide evidence of maintaining a method to guarantee payment of deferred premiums for each licensed operating reactor. Regulatory Guide 9.4 provides guidance for the guarantee method of submitting financial statements showing that a cash flow can be generated and would be available for payment of retrospective premiums within three months after submission of a request for payment.

In accordance with the above requirements, the Nuclear Management Company, LLC (NMC) acting as agent for Xcel Energy, is hereby submitting the required 2004 actual and 2005 projected cash flow statements for the Monticello Nuclear Generating Plant and Prairie Island Nuclear Generating Plant Units 1 and 2. The 2005 projected cash flow is considered company confidential information, is appropriately marked as required by 10 CFR 2.390(b)(1)(i) and supported with the attached required affidavit for withholding proprietary information from public disclosure.

As noted above, the 2005 cash flow information is considered company confidential, and as such NMC requests that it be withheld from public disclosure pursuant to 10 CFR 2.390(a)(4). The competitive position of the information owner, Xcel Energy, would be harmed if disclosed. The affidavit to support this request is provided as Enclosure 1. Enclosure 2 and Enclosure 3 provide proprietary and non-proprietary versions of the cash flow information respectively.

**Enclosure 2 Contains Proprietary Information**

**Summary of Commitments**

This letter contains no new commitments and no revisions to existing commitments.

  
Edward J. Weinkam  
Director, Regulatory Services  
Nuclear Management Company, LLC

Enclosures (3)

cc: Administrator, Region III, USNRC  
Project Manager, Monticello Nuclear Generating Plant, Prairie Island Nuclear  
Generating Plant Units 1 and 2, USNRC  
Senior Resident Inspector, Monticello Nuclear Generating Plant, Prairie Island  
Nuclear Generating Plant Units 1 and 2, USNRC  
Minnesota Department of Commerce (without enclosures)

**ENCLOSURE 1**

**AFFIDAVIT**

**REQUEST TO WITHHOLD PROPRIETARY INFORMATION FROM PUBLIC  
DISCLOSURE**

**2 pages follow**

**UNITED STATES NUCLEAR REGULATORY COMMISSION**

**XCEL ENERGY**

**MONTICELLO NUCLEAR GENERATING PLANT  
PRAIRIE ISLAND NUCLEAR GENERATING PLANT**

**DOCKET No. 50-263  
DOCKET Nos. 50-282  
50-306**

**Request to Withhold Proprietary Information from Public Disclosure**

Xcel Energy hereby requests that Enclosure 2 to the letter entitled "Guarantee of Payment of Deferred Premiums" dated March 30, 2005, be withheld from public disclosure due to its proprietary nature. The details of this request are provided in the following affidavit:

**AFFIDAVIT**

I, Charles R. Bomberger, being duly sworn, depose and state as follows:

- (1) I am the General Manager, Nuclear Asset Management, for the two nuclear generating plants owned by Northern States Power Company (NSP) d/b/a Xcel Energy and have been delegated the function of reviewing the information described in paragraph (2) which is sought to be withheld, and have been authorized to apply for its withholding.
- (2) The information sought to be withheld consists of portions of the 2005 Projected Cash Flow that is included in Enclosure 2 to the Nuclear Management Company (NMC) March 30, 2005 letter to the NRC entitled "Guarantee Of Payment Of Deferred Premiums". Enclosure 2, a one page document, has the words "Proprietary" on the top of the page and "NSP Proprietary Information" on the bottom of the page.
- (3) The information sought to be withheld is confidential financial information as set forth in 10 CFR 2.390 (a)(4) which is the basis for proposing the information be withheld.
- (4) Disclosure of the information sought to be withheld would result in harm to the competitive position of Xcel Energy.
- (5) In making this application for withholding of proprietary information of which it is the owner, Xcel Energy and NMC rely upon the exemption from disclosure set forth in the NRC regulation 10 CFR 2.390(b)(1) for confidential financial information.
- (6) Justification for the request for withholding from public disclosure is provided by addressing the five items identified in 10 CFR 2.390(b)(4).

To the best of my knowledge and belief:

- a. This information is considered company confidential and has been held in confidence by Xcel Energy and NMC.
- b. This information is of the type customarily held in confidence by Xcel Energy and NMC and the rationale basis is that it would provide an unfair advantage to competitors if it were disclosed.
- c. This information is transmitted in confidence to the NRC and the purpose of this request is to maintain its confidentiality.
- d. The 2005 projected cash flow information is not available from public sources.
- e. Public disclosure of the information sought to be withheld is likely to cause harm to Xcel Energy's and NMC's competitive position and reduce the availability of profit-making opportunities.

This letter contains no restricted or other defense information.

XCEL ENERGY

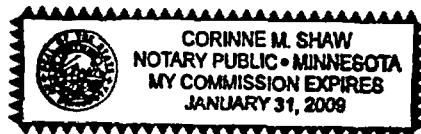
By Charles R. Bomberger  
Charles R. Bomberger  
General Manager,  
Nuclear Asset Management, Xcel Energy  
Monticello Nuclear Generating Plant  
Prairie Island Nuclear Generating Plant

State of Minnesota

County of Hennepin

On this 15<sup>th</sup> day of March 2005 before me a notary public acting in said County, personally appeared Charles R. Bomberger, General Manager, Nuclear Asset Management, for Monticello Nuclear Generating Plant and Prairie Island Nuclear Generating Plant, and being first duly sworn acknowledged that he is authorized to execute this document on behalf of Xcel Energy, that he knows the contents thereof, and that to the best of his knowledge, information, and belief the statements made in it are true.

Corinne M. Shaw



**ENCLOSURE 1**

**AFFIDAVIT**

**REQUEST TO WITHHOLD PROPRIETARY INFORMATION FROM PUBLIC  
DISCLOSURE**

**2 pages follow**

NORTHERN STATES POWER COMPANY MINNESOTA

2004 Actual Cash Flow and  
2005 Projected Cash Flow

Related to Prospective Premiums for  
Monticello, Prairie Island Unit 1 and Prairie Island Unit 2  
Nuclear Generating Units

(Dollars in Thousands)

	2004 Actual Total	2005 Projected Total
Net Income After Taxes	230,274	<b>Withheld from public disclosure per Affidavit</b>
Less Dividends Paid	<u>(213,033)</u>	
Retained Earnings	17,241	
Adjustments:		
Depreciation	395,183	
Deferred Income Taxes & Investment Tax Credits	13,395	
Allowance for Funds Used During Construction	<u>(20,747)</u>	
Total Adjustments	<u>387,831</u>	
Internal Cash Flow	<u>405,072</u>	
Average Quarterly Cash Flow	<u>101,268</u>	

Percentage Ownership in All Operating Nuclear Units	Monticello	Prairie Island Unit 1	Prairie Island Unit 2
	100%	100%	100%

Maximum Total Contingent Liability for Secondary Financial Protection	\$301,770,000/accident \$ 30,000,000 maximum payment/year

Director, Cash Management  
Eric V. Gray  
3/10/2005

NON-PROPRIETARY VERSION