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December 5, 2008

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The Honorable Beverly Jones Heydinger
Administrative Law Judge
Office of Administrative Hearings
P.O. Box 64620
St. Paul, MN 55164-0620

Re: In the Matter of the Application of Great River Energy, Northern States Power Company (d/b/a Xcel Energy) and Others for Certificates of Need for the CapX 345-kV Transmission Projects;
MPUC Docket No.: ET-2, E-002, *et al.*/CN-06-1115
OAH Docket No.: 15-2500-19350-2

Dear Judge Heydinger:

Enclosed for e-filing in the above matter, please find the Minnesota Office of Energy Security Initial Brief.

Respectfully submitted,

s/ **Julia E. Anderson**

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Enclosure

AG2349705

**STATE OF MINNESOTA
OFFICE OF ADMINISTRATIVE HEARINGS
FOR THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In The Matter of the Application
of Great River Energy, Northern
States Power Company (D/B/A
Xcel Energy) and Others for
Certificates of Need for Three
345 kV Transmission Lines With
Associated System Connections

PUC Docket No. ET2, E002/CN-06-1115

**MINNESOTA OFFICE OF ENERGY SECURITY
INITIAL BRIEF**

I. BACKGROUND.

The Minnesota Office of Energy Security (OES) submits this *Initial Post-Hearing Brief* to provide the Administrative Law Judge (ALJ) and the Minnesota Public Utilities Commission (Commission) with analyses of facts and law supporting its position in the above-entitled certificate of need (CN) proceeding. This initial brief is filed in the form of a response to certain legal claims, legal motions and factual assertions contained in the October 24, 2008 *Applicants' Post-Hearing Brief on the Merits of the Application for Certificates of Need* (Applicants' Brief) filed by Northern States Power Company, a Minnesota corporation and Great River Energy, a Minnesota Cooperative Corporation (collectively, Applicants). As will be shown, OES agrees with Applicants' extensive representation of facts, issues, and analyses, as well as with their detailed proposed Findings of Fact and Conclusions in this matter. Moreover, OES agrees that the proposed transmission facilities including Applicants' upsizing alternative are needed, that no conditions were shown to be reasonable or prudent. Therefore, the OES recommends approval of Applicants' certificate of need requests. The OES identifies several additional and revised

proposed Findings of Fact and Conclusions that are consistent with Applicants' proposed Findings and Conclusions, as discussed further, below.

II. ISSUES.

A. Main Issues.

The two main issues before the Commission are 1) whether the Applicants' three proposed 345 kV transmission lines, two proposed 161 kV transmission lines, and the associated system upgrades satisfy the statutory and rule criteria for need, and 2) whether a party other than the Applicants demonstrated a more reasonable and prudent alternative to the proposal. The OES concludes that the Applicants demonstrated sufficient record evidence to support a determination that: 1) there exist multiple needs for the three proposed 345 kV transmission lines as well as two proposed 161 kV transmission lines, and 2) no other party proved a more reasonable and prudent alternative. In particular, no other party proved that certain proposed conditions regarding the type and amount of generation that may use the facilities are reasonable or prudent. Rather, the record shows that the proposed conditions are not reasonable or prudent and are not in the public interest. Applicants' Initial Br. at 83-95. Thus, OES recommends approval of the proposed CNs.

B. Other Issues.

Applicants responded to concerns raised by parties in this proceeding as shown by their willingness to evaluate, and ultimately propose its own upsizing alternative proposal as well as to evaluate concerns expressed regarding possible endpoint locations. Applicant Initial Br. at 3. To that end, however, Applicants identified several minor errors. Below, OES discusses each minor error and concludes that all have been resolved by additional record facts and that none

undermines record support for Applicants' proposed certificates of need. Where helpful, the OES recommends additional proposed Findings of Fact.

1. Hazel Creek - Minnesota Valley segment (Brookings Project), proposed as 345 kV double circuit capable but operated at 230 kV.

Applicants recommend that the Commission approve the Upsizing Alternative summarized in Exhibit 311, as set forth in the table on page 3 of Applicants' Initial Brief. However, in footnote 6 the Applicants state:

Applicants note that Exhibit 311 contains an error. It incorrectly reflected that the Hazel Creek--Minnesota Valley segment would be "Single or Upsized." Applicants and OES agree the configuration for this segment is 345 kV double-circuit capable but operated at 230 kV.

Applicants' Initial Br. at 3 fn 6.

OES agrees with Applicants' correction. In explanation, the OES notes that at the time that Exhibit 311 was created the OES was not aware that the Applicants agreed with an upsized configuration for the Hazel Creek—Minnesota Valley segment.

2. A 500 kV option is withdrawn.

In footnote 7 on page 4 of their Initial Brief, the Applicants state, "Applicants understand that OES no longer supports the 500 kV Option." The Applicants are correct in that the OES no longer supports the 500 kV option for either the Fargo project or the Brookings project. The OES's withdrawal of the 500 kV option is accurately reflected in the Applicants' proposed Findings of Fact No. 324. Ex. 308 (Rakow Statement at 5).

3. Double Circuiting will require a CN.

In footnote 12 on page 14 of their Initial Brief, the Applicants state, "Applicants' acknowledge that they could not string the second circuit without obtaining a certificate of need or other regulatory approvals in a subsequent proceeding." The OES agrees that a CN and other

regulatory approvals will be necessary before a second circuit may be strung. That said, the public is best served by adopting a long-term view of transmission system planning. As OES witness Dr. Steve Rakow testified:

[T]he point of the instant proceeding is not to determine the need for and timing of such events but to plan and permit a transmission system that can adapt if and when such events occur.

Ex. 282 at 36 (Rakow Direct). In summary, the Applicants' upsized proposal best allows the transmission system to adapt if and when a variety of contingencies occurs and thus meets the OES's policy goals.

4. Timing of the Northern Hills - Rochester 161 kV line (LaCrosse Project).

On pages 24-25 of the their Initial Brief, the Applicants state, "Applicants request flexibility to construct the Northern Hills -- North Rochester 161 kV line by 2011 (unless the RIGO projects are permitted, in which case, by 2013)." The OES understands that the 2013 date is a typographical error. The correct date is 2012, which is accurately reflected in the Applicants' proposed Findings of Fact Nos. 79 and 376. Further, the OES does not object to the Commission following the Applicants' proposed approach. Another approach the Commission could select is simply to find 1) that Applicants' have demonstrated in this proceeding that the facilities are need by 2011, 2) note that the proposed RIGO projects (see Docket No. E002/CN-08-992) might impact the timing of the Northern Hills -- North Rochester 161 kV line and, if so, 3) the Commission's RIGO order may adjust the in-service date. Ex. 303 at 13-14 (Rakow Rebuttal). This option is reflected in Applicants' proposed Finding of Fact No. 78.

5. List of alternatives proposed by other parties/recommended Finding of Fact No. 325A.

In footnote 68 on page 66 of their Initial Brief, the Applicants list the alternatives proposed by other parties. The list correctly excludes the multi-faceted alternative provided by North

American Water Office and Institute for Local Self-Reliance (NAWO/ILSR) witness Mr. Michaud. Ex. 154 at 47-48 (Michaud Surrebuttal). Mr. Michaud's alternative was not offered timely offered before the close of public hearings, as required by Minnesota Rule 7849.0110, and was not supported by substantial record evidence, as required by Rule 7849.0120.

As to the record, significant factual gaps exist that prevent substantive evaluation of the proposal. The OES notes specifically that the record reflects the following factual omissions regarding Mr. Michaud's multi-faceted alternative:

1. no estimate is provided of incremental line losses and their cost;
2. no estimate is provided of incremental emissions of pollutants and their cost;
3. no justification is provided for the cost allocation factors used;
4. no information is provided on whether the alternative meets the needs it does address for a similar time period;
5. the cost, timing, and MW impact of the smart grid component is not provided;
6. the variable costs of the generation components have not been provided;
7. the size, type, and timing of the generation components have not been defined; and
8. appears to not meet the same set of needs (e.g., no solution to the Red River Valley south zone is offered).

Ex. 154 at 46-48 (Michaud Surrebuttal).

As to timing, Mr. Michaud's alternative was not offered at a time where the public as well as other parties could evaluate the proposal, unlike the following alternative proposals:

- the double-circuit 345 kV alternative proposed by Mr. Schedin on behalf of the Joint Intervenors; Ex. 177 at 23 (Schedin Direct).
- the upsize alternative proposed by Mr. Grivna on behalf of the Applicants; Ex. 121 at 43 (Grivna Rebuttal). and
- the 500 kV alternative proposed by Dr. Rakow on behalf of the OES Ex. 282 at 78 (Rakow Direct).

In summary, the OES concludes that, under Minnesota Rules 7849.0110, Mr. Michaud's alternative cannot be considered since the alternative was not proposed before the close of the public hearing and substantial evidence does not exist in the record with respect to each of the

criteria listed in part 7849.0120. To reflect this fact, the OES would add an additional finding, No. 325A:

325A. In his prefiled surrebuttal testimony, Mr. Michaud suggested that the Applicants pursue a multi-faceted alternative. Mr. Michaud's alternative cannot be considered by the Commission since it was not proposed before the close of the public hearing, and there does not exist substantial evidence on the record with respect to each of the criteria listed in part 7849.0120. Ex. 154 at 47-48 (Michaud Surrebuttal).

6. The CNs will decrease statewide carbon dioxide emissions.

Regarding proposed Findings of Fact Nos. 458 to 465, to the effect that the proposed facilities will not contribute to an increase in carbon dioxide emissions, OES notes that the proposed transmission line projects will actually decrease statewide carbon dioxide emissions. This is because the incremental impact of the proposed projects is to decrease line losses, thus decreasing the quantity of fuels burned. Ex. 282 47-51 (Rakow Direct); Ex. 303 at 32 (Rakow Rebuttal). Further, as Dr. Rakow observed, likely carbon emission regulation in the near future will mean that existing coal-fired generation will have to be replaced, which will free up additional transmission capacity for wind and other renewable sources. 24 TrV. at 70-73 (Rakow). Proposed Findings of Fact 448-465.

7. Fargo Project configuration.

The OES notes that Applicants' Conclusion No. 11 states that the configuration in Exhibit No. 22 is the most appropriate. OES understands that this is not an accurate reflection of Applicants' final position as Exhibit 22 identifies the Maple River Substation as the terminus for the Fargo Project. However, Mr. Kline stated that Applicants request a Fargo-area termination for the Fargo Project. This could be either the Maple River Substation or a nearby substation constructed as part of this project. Ex. 312 at 3 (Kline Final Rebuttal).

8. Correction of docket number to read, "E-002/CN-06-1115."

Finally, the OES notes a correction to a typographical error the docket number in Finding of Fact No. 6, which should read:

6. On August 4, 2006, Xcel Energy submitted a Proposed Certificate of Need Notice Plan for a 345 kV project between the Twin Cities and Fargo, North Dakota ("Fargo Project") in Docket No. E-002/CN-06-1115.

III. NEED ISSUES.

Applicants demonstrated by substantial evidence in the record that the proposed transmission lines are needed for 1) community service reliability, 2) system-wide load growth, and 3) generation outlet for expected generation, and that the record satisfies the statutory and rule need criteria. Applicants' Initial Br. at 4-11; 23-65. In particular, OES's independent forecast analysis, taking into account Renewable Energy Standards (RES) as well as required Conservation and Demand Side Management (DSM), confirmed Applicants' load forecasts. That is, OES's DSM adjusted 2020 forecasts range from 25,690 MW to 26,357 MW¹ all of which are inside of the range of the CapX vision plan's base and slow growth case of 24,701 MW and 26,488 MW. Also, as it is shown in the updated figure 6-6 at page 47 of Applicants' Initial Brief, all the forecasts discussed in the record lie within the CapX vision plan's base and slow growth case of 24,701 MW and 26,488 MW. In other words, OES's low forecasting is still 989 MW higher than Applicants' low forecast and NAWO/ILSR Information Request No. 7 low forecast is 726 MW higher than Applicants' low forecast.²

¹ Mr. Ham shows a 2020 load of 27,060 MW. Ex. 257 at 15, ln 7 (Ham Direct). Mr. Davis shows a range of DSM saving of 703 to 1,370 MW in 2020 Ex. 215 at 17, ln 11 (Davis Direct). The 2020 forecasts range is calculated as follows: 26,357 MW = 27,060 MW - 703 MW and 25,690 MW = 27,060 MW - 1,370 MW.

² The current economic recession was raised by NoCapX 2020 at hearing. The current economic downturn may impact the permanent growth rate of electricity demand. However, the Applicants' low forecast is low enough to capture the possible low growth. 23 TrV. at 126 (Ham).

IV. ALTERNATIVES ISSUES.

OES agrees that no party other than the Applicants demonstrated a more reasonable and prudent alternative to the proposed CNs. In this regard, OES recommends additional and revised proposed Findings of Fact and Conclusions to address 1) end point determinations for the LaCrosse and Fargo Projects, and 2) a cost comparison as to the alternatives proposed.

A. End Point Determination.

The record establishes that the least cost endpoint for the LaCrosse Project is the Alma Crossing/North LaCrosse substation, and for the Fargo Project it is the Maple River substation. [Ex. 307 at 25 (Rakow Surrebuttal), Ex. 312 at 3 (Kline Final Rebuttal)]. Nonetheless, Applicants suggest that the Commission may wish to allow itself some flexibility in this regard for purposes of subsequent routing proceedings. Specifically, at page 25 the Applicants' Initial Brief identifies the least cost endpoint of the LaCrosse Project as the Alma Crossing/North LaCrosse substation, but urges flexibility:

“[T]he “best information at this time indicates that the Alma crossing appears to have both the least cost and the least environmental impact. Therefore, the Commission should order the Alma crossing in this proceeding.” Ex. 307 at 25 (Rakow Surrebuttal). Dr. Rakow did recognize, however, that at this time in this record the impacts are similar and the Commission could deem either endpoint reasonable in the need case and leave the final decision for the Commission's future routing docket where a full environmental impact statement will be developed.

This statement accurately reflects the OES's position. The OES notes that the framework for the endpoint decision is the same regardless of the proceeding in which the determination of end points is made. The Commission must weigh the cost increase imposed by not using the least cost end point (Maple River substation for the Fargo project and the Alma Crossing/North La Crosse substation for the La Crosse project) versus the non-economic benefits attained by

choosing an alternative end point. Dr. Rakow explained this decision framework during cross examination by Mr. Eknes, first for the Fargo project and then for the La Crosse project:

Q Yeah, I wasn't looking for the Commission's authority.

A Okay.

Q Whether it was a wise thing to do or not.

A Okay. That's easy. The costs that Mr. Kline provides us is \$20 million to go to a different substation. In PVRR terms that's 29 million for the proposed ownership structure, you just take the 20 and multiply it by the 1.45 figure from my direct. And then the question for the Commission -- and this is the exact same question on the La Crosse, by the way -- is what are you buying for the \$29 million PVRR? What benefit, what value are you getting? And the same question applies to La Crosse. There it's, from a surrebuttal statement, a range of about 25 to 40. You're spending that money, what are you buying? If the Commission can convince itself it's buying something, they should do it. If the Commission cannot convince itself that they're buying something of value, then you do not. And that's the fundamental question.

25 TrV. at 58-59 (Rakow).

Thus, the fundamental question that must be answered for a Fargo alternative end point to the Maple River substation is, what benefits are being purchased by the \$29 million PVRR cost increase? The same type of fundamental question must be answered for a La Crosse alternative end point to the Alma Crossing/North La Crosse substation: what benefit is being purchased by the \$25 million to \$40 million PVRR cost increase?

To reflect these facts for the La Crosse project, the OES recommends: proposed Finding of Fact No. 90 be revised, proposed Finding of Fact No. 90A be added, and that proposed Conclusion No. 13 be revised, as follows:

90. The ALJ finds that that the best information at this time indicates that the Alma crossing has both the least cost and the least environmental impact. However, the Commission could deem either endpoint reasonable in the need case and leave the final decision for the Commission's future routing docket. The ALJ further finds that under the circumstances it is appropriate to grant Applicants the flexibility not to build the North Rochester - Chester 161 kV line.

90A. The ALJ finds that regardless of the venue for the decision, the Alma Crossing/North La Crosse substation has a cost lower by between \$25 million to \$40 million PVRR. Offsetting benefits would have to be found for an alternative end point to be selected.

13. The appropriate Mississippi River crossing for the La Crosse Project is the Alma crossing. However, the Commission could deem either endpoint reasonable in the need case and leave the final decision for the Commission's future routing docket.

To reflect these facts for the Fargo Project, the OES recommends the addition of Findings of Fact Nos. 95A and 95B, as follows:

95A. The ALJ finds that that the best information at this time indicates that the Maple River substation has both the least cost and the least environmental impact. However, the Commission could deem granting flexibility as reasonable for purposes of the need case and leave the final decision for the Commission's future routing docket.

95B. The ALJ finds regardless of the venue for the decision, the Maple River substation has a cost lower by between \$29 million PVRR. Offsetting benefits would have to be found for an alternative end point to be selected.

B. Cost of the Proposed Facility Compared to the Cost of Alternatives

The OES notes that Applicants' Initial Brief and proposed Findings and Conclusions did not include a specific section stating the record facts regarding Minnesota Rules 7849.0120 B(2), which states that the Commission must consider "the cost of the proposed facility and the cost of energy to be supplied by the proposed facility compared to the costs of reasonable alternatives and the cost of energy that would be supplied by reasonable alternatives." The cost of Applicants' original proposal and the cost of its proposed upsized facility are found in proposed Findings of Fact Nos. 91, 95, and 99. Moreover, proposed Finding of Fact Nos. 326 and 327 clarify that the Applicants' initial proposal and the Applicants' upsize proposal are the only alternatives that can be considered; no other party submitted any alternatives that satisfy the requirements of Minn. R. 7849.0110 and 7849.0120. The OES' independent analysis concluded that a more reasonable and prudent alternative to the proposed upsized facility had not been

demonstrated. Ex. 307 at 8, 9, and 21 (Rakow Surrebuttal).

V. SUMMARY OF ISSUES.

The OES recommends adoption of Applicants' comprehensive proposed Findings of Fact and Conclusions, together with the following additions and revisions:

6. On August 4, 2006, Xcel Energy submitted a Proposed Certificate of Need Notice Plan for a 345 kV project between the Twin Cities and Fargo, North Dakota ("Fargo Project") in Docket No. E-002/CN-06-1115.

90. The ALJ finds that that the best information at this time indicates that the Alma crossing has both the least cost and the least environmental impact. However, the Commission could deem either endpoint reasonable in the need case and leave the final decision for the Commission's future routing docket. The ALJ further finds that under the circumstances it is appropriate to grant Applicants the flexibility not to build the North Rochester - Chester 161 kV line.

90A. The ALJ finds that regardless of the venue for the decision, the Alma Crossing/North La Crosse substation has a cost lower by between \$25 million to \$40 million PVR. Offsetting benefits would have to be found for an alternative end point to be selected.

95A. The ALJ finds that that the best information at this time indicates that the Maple River substation has both the least cost and the least environmental impact. However, the Commission could deem granting flexibility as reasonable for purposes of the need case and leave the final decision for the Commission's future routing docket.

95B. The ALJ finds regardless of the venue for the decision, the Maple River substation has a cost lower by between \$29 million PVR. Offsetting benefits would have to be found for an alternative end point to be selected.

325A. In his prefiled surrebuttal testimony, Mr. Michaud suggested that the Applicants pursue a multi-faceted alternative. Mr. Michaud's alternative cannot be considered by the Commission since it was not proposed before the close of the public hearing and there does not exist substantial evidence on the record with respect to each of the criteria listed in part 7849.0120. Ex. 154 at 47-48 (Michaud Surrebuttal).

The OES recommends the following additions and revisions to Xcel's proposed Conclusions as contained in the proposed Findings of Fact:

13. The appropriate Mississippi River crossing for the La Crosse Project is the Alma crossing. However, the Commission could deem either endpoint

reasonable in the need case and leave the final decision for the Commission's future routing docket.

Dated: December 5, 2008

Respectfully submitted,

s/ Julia E. Anderson

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s/ Dr. Steve Rakow

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AG: #2343060-v1

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Re: In the Matter of the Application of Great River Energy, Northern States Power Company (d/b/a Xcel Energy) and Others for Certificates of Need for the CapX 345-kV Transmission Projects; MPUC #ET-2, E-002, *et al.*/CN-06-1115; OAH #15-2500-19350-2

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I hereby state that on the 5th day of December 2008, I e-filed the attached Minnesota Office of Energy Security Initial Brief, and served the same upon all parties listed on the attached service list by e-mail, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

s/Pat Silberbauer

Subscribed and sworn to before me
on December 5, 2008

s/ Deborah A. Bastyr
Notary Public - Minnesota
My Commission Expires Jan. 31, 2010

**In the Matter of the Application of Great River Energy, Northern States Power Company
(d/b/a/ Xcel Energy) and others for Certificates of Need for the Cap X 345-kV
Transmission Projects**

PUC Docket No. CN-06-1115

OAH Docket No. 15-2500-19350-2

OAH Service List as of August 18, 2008

All Parties have agreed to E-File documents at: www.edockets.state.mn.us.

Filing with edockets shall constitute service on the Public Utilities Commission, the Department of Commerce and the Office of Administrative Hearings.

As of this date, all parties have agreed to accept service by e-mail at the e-mail addresses listed. However, where indicated, parties have requested that the e-mail be followed by mail or delivery of a hard copy.

In the event that a pleading or attachment cannot be filed and served electronically, it must be filed and served on each of the parties at the addresses listed.

Documents that contain trade secret or nonpublic data may be e-filed, but may not be copied or served electronically.

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| *If there is a trade-secret version and a public version of the same document, only hard copies of the trade-secret version must be provided. | |

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