

October 23, 2012

Lisa M. Agrimonti
(612) 977-8656
lagrimonti@briggs.com

Carol Overland, Esq.
Legalelectric - Overland Law Office
1110 West Avenue
Red Wing, MN 55066

Re: In the Matter of the Application of Great River Energy (GRE) and 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
MPUC Docket No.: ET-2, E002, et al./CN-06-1115
OAH Docket No: 15-2500-19350-2

Dear Ms. Overland:

I write on behalf of Northern States Power Company, a Minnesota corporation ("Xcel Energy"), regarding the "Post Permit Information Request" dated October 10, 2012 ("Request") sent by NoCapX2020, United Citizen Action Network and Citizens Energy Task Force ("CETF"). Xcel Energy objects to the request in its entirety because the request is untimely and seeks confidential trade secret information that is not necessary for review of Xcel Energy's compliance filings in this docket.

The contested case in this matter took place in 2008 and concluded in September of that year. After the hearings are concluded, discovery is foreclosed. As counsel for NoCapX2020, you recognized that no discovery is permitted after hearings. In November 2008, you filed a motion asking that the record be reopened and that NoCapX2020 be permitted to engage in limited discovery. The Administrative Law Judge denied this request by Order dated December 10, 2008.

Even if the request were properly made, Xcel Energy does not believe disclosure of the details of confidential agreements is necessary or appropriate in connection with the October 8, 2012 compliance filing submitted for the Fargo Project Phase III. The May 22, 2009 Certificate of Need Order Point No. 4 required that applicants "make a compliance filing disclosing each project's transmission capacity, owners, and ownership structure." Over the past two years, Xcel Energy and Great River Energy have made five compliance filings in conformity with this and/or other compliance requirements (Fargo Phase I on August 20, 2010, Fargo Phase II on August 17, 2011, and Brookings on January 14, 2011, January 31, 2011 and January 26, 2012). These

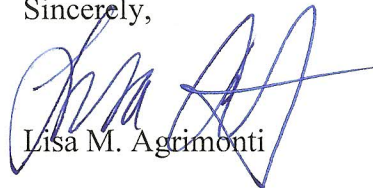
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also referenced these business agreements. At no time has any person requested that the agreements be provided.

It was not until the submission of the sixth compliance filing for Fargo Phase III on October 8, 2012, that there was a request for the agreements. The "Information Request" seeks copies of the already completed agreements for the entire Fargo Project and the Brookings—Hampton 345 kV Project, as well as for the Hampton—La Crosse 345 kV Project, for which construction agreements do not yet even exist. These agreements contain confidential trade secret information and Xcel Energy does not believe disclosing these documents would inform the compliance filing process, particularly given they have not been deemed necessary in the past.

Finally, to the extent CETF seeks to propound discovery, such request is improper because CETF is not a party in this docket.

Sincerely,



Lisa M. Agrimonti

LMA/dba

cc: Paul J Lehman
Stephen Rakow
Julia Anderson
Burl W. Haar