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ITC Midwest Transmission Project - Information Request #2

Docket Number: PUC Docket No.: ET6675/CN-12-1053 Request Date: February 18, 2014
OAH Docket No.: 60-2500-30782

Requested From: Julia Anderson, DER, Dept. of Commerce

Party Requesting Information: Carol A. Overland for No CapX2020 and CETF

If you feel your responses are trade secret or privileged, please indicate this on your response.

Request No.	ITC Transmission Project
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2. **RE: Full disclosure of transmission related contractual activities of Bill Grant, Deputy Commissioner of Commerce.**

While head of the Izaak Walton League Midwest, and while Wind on the Wires was a program of the Izaak Walton League (estimated between 2001 and 2010) upon information and belief, Bill Grant, now Deputy Commissioner of Commerce, had negotiated with utilities regarding transmission and had signed agreements with utilities and funders in which transmission is a subject and material term. For example, agreements were negotiated with Xcel/NSP during the time period of the Southwest Minnesota 345kV proceeding (PUC Docket 01-1958), resulting in at least two agreements, the “Community Wind agreement,” (see reference in ALJ Recommendation in Docket 01-1958) and the agreement filed in the ITC/NSP TRANSLink Docket 02-2152 (attached). The 1999 NSP “Merger Agreement” also had a paragraph related to transmission in Southwest Minnesota (attached).

- a. Please provide complete copies of any and all agreements, stipulations, and/or contracts that Bill Grant and/or any other IWLA employee has signed on behalf of the Izaak Walton League and/or Wind on the Wires, during their employment with IWLA, with any utility, utility holding company, utility subsidiary, co-operative, municipal utility and/or transmission company regarding transmission, and/or expressly or impliedly related to transmission, including but not limited to, “TRANSLink agreement,” “Merger Agreement,” “Collector System,” “Big Stone,” “Distributed Generation Study,” etc.,

including but not limited to the primary agreement, as described above, and any dependent/secondary/side agreements related to these agreements.

- b. Please provide complete copies of any and all agreements, stipulations, and/or contracts that Bill Grant and/or any other IWLA employee has signed on behalf of the Izaak Walton League and/or Wind on the Wires with funders regarding transmission, and/or expressly or impliedly related to transmission.
- c. Please provide complete copies of any and all agreements, stipulations, and/or contracts that Bill Grant and/or any other IWLA employee has signed on behalf of the Izaak Walton League and/or Wind on the Wires regarding requirements, incentives, parameters, and/or limits to the organization's intervention, comment and/or participation in specific or general transmission docket(s) and/or transmission related activities, such as intervention and participation in permitting, rate or rulemaking proceedings, lobbying for transmission or tariff legislation (particularly 2005 Ch. 97), transmission entities and transfer of assets, wind promotion, etc.
- d. In conjunction with agreements and contractual obligations signed by Bill Grant and/or any IWLA employee during his tenure at IWLA, as above, provide copies of any dependent, related, ancillary and/or associated side agreements and/or funding agreements, expressly or impliedly regarding transmission, entirely or in part.
- e. Identify and provide copies of any agreements, stipulations, contracts, etc., which contain contractual requirements, incentives, boundaries and/or limits to participation in the SW Minnesota 345 kV proceeding (PUC Docket 01-1958); CapX 2020 Certificate of Need (PUC Docket 06-1115) and ITC transmission Certificate of Need (PUC Docket 12-1053).

These requests are continuing, and if new or additional information is discovered, please supplement your responses as soon as possible.

Electronic format preferred, via email or CD.

Response by:	_____	List sources of information:	_____
Title:	_____		_____
Department:	_____		_____
Telephone:	_____		_____
