



414 Nicollet Mall  
Minneapolis Minnesota 55401

January 27, 2014

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

—Via Electronic Filing—

RE: REPLY COMMENTS  
UTILITY RENEWABLE ENERGY COST IMPACT REPORTS  
DOCKET NO. E999/CI-11-852

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to Comments regarding the Commission's November 6, 2013 Notice and proposed renewable energy cost impact reports.

We have electronically filed this document with the Commission, and copies of this filing have been served on the parties on the attached service list. Please contact me at 612-330-6732 or [james.r.alders@xcelenergy.com](mailto:james.r.alders@xcelenergy.com) if you have any questions regarding this filing.

SINCERELY,

/s/

JAMES R. ALDERS  
STRATEGY CONSULTANT

Enclosure  
c: Service Lists

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
J. Dennis O'Brien	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF UTILITY RENEWABLE  
ENERGY COST IMPACT REPORTS  
REQUIRED BY MINNESOTA STATUTES  
SECTION 216B.1691, SUBD. 2E

DOCKET NO. E999/CI-11-852

**REPLY COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to Comments of various parties in the docket referenced above. We appreciate the opportunity to provide additional comments regarding the reporting of cost impacts associated with renewable energy mandates in Minnesota. We note that many parties support common methodologies such as use of a 15-year forecast period and combined reporting of RES and REO resources, and we provide limited Reply Comments. Specifically, we address potential issues regarding trade secret information and elaborate on our recommendation for avoided cost calculations.

**REPLY**

**A. Potential Trade Secret Issues**

Because the renewable energy industry is competitive, we believe it is necessary and in the best interest of our customers to classify some data as trade secret. We fully support the goal of creating a transparent system of reporting, and we believe that much of the aggregate data can be reported on a per-kWh basis. However, we must protect against the disclosure of prices associated with newly acquired projects. Any time the Company enters into a new contract with a renewable energy developer, the terms of the agreement specify that trade secret pricing information cannot be disclosed. While none of the proposed reporting templates suggest that the price of individual projects be publicly disclosed, it is possible to infer project prices if the

wrong type of data is provided or if only a small number of projects are involved in a calculation.

Of equal concern is the public disclosure of avoided cost estimates. Parties generally agree that the cost of renewable energy must be compared to the cost of generation from conventional fossil fuels, and we agree. When reported on a per-kWh basis, these avoided costs essentially show what a utility's breakeven price is for a particular renewable energy resource. As an example, consider the avoided cost for wind energy. Should a utility publicly disclose that its estimate of the avoided cost of wind is \$40/MWh (note that this is a hypothetical value), we believe there could be negative impacts the next time the utility attempts to acquire new wind resources. If a company has announced that its breakeven price for wind is \$40/MWh, bidders are likely to only offer prices in that range. If a company's avoided cost is unknown, it will be more likely that bidders will offer the lowest price possible.

Given the contractual confidentiality issues associated with new projects and the potential harm to customers through disclosure of avoided cost information, we recommend that only the highest levels of aggregated data be disclosed publicly. High-level aggregated data will provide interested parties with enough information to conclude whether renewable portfolios are cost effective, and if not, what the approximate impact on rates will be. Disclosure of additional detailed data will likely require nondisclosure agreements, and some parties that could use the data to create a competitive disadvantage for the utility will necessarily have limited access to sensitive information.

## **B. Avoided Cost Calculations**

Some parties recommended the use of public data sources for the estimation of avoided costs. Use of public sources would alleviate some confidentiality issues and could potentially standardize the analysis. However, we believe publicly available data would not accurately reflect our true avoided cost projections and could result in a misleading analysis. Further, the suggested use of only natural gas as replacement for renewables does not account for the fact that coal is a common marginal resource in the region, and as such should be considered in the analysis.

Through the Resource Planning process utilities make extensive efforts to develop and support precise estimates for the future costs of energy and the performance of their generation resources. The use of complex simulation models enables utilities to create robust plans to meet future energy needs at the lowest cost possible. If the future cost of RES compliance were reported based on simple publicly available data, there could be significant differences from the conclusions drawn in a Resource Plan.

For example, model simulations may indicate that higher levels of wind energy would be cost effective for customers of a particular utility. As such, that utility may identify new wind additions in its Resource Plan. If the RES impact reporting utilizes different assumptions about avoided fossil fuel resources, the results could indicate a different conclusion. The RES cost reporting template could identify cost increases from wind while the Resource Plan could identify costs savings.

While the use of public data sources could alleviate some confidentiality issues, we believe it is important to maintain consistency with the robust analysis in the Resource Plan. For this reason, we do not believe it would be appropriate to require utilities to produce cost forecasts for reporting purposes based on assumptions that do not match the utilities' own best estimates.

Finally, we note that the Xcel Large Industrials commented on the use of the Strategist model to estimate the long-term costs and benefits of renewables. While we are interested in engaging in discussion with parties on modeling issues, we believe these discussions are more appropriate in the Resource Planning process where specifics related to modeling and assumptions are thoroughly reviewed. However, to provide information for the record in this docket, we note that we do not believe XLI's recommendation for the use of the Promod model would be practical. We know of no utility that currently uses Promod for 15-year forecasts, as this model was designed and developed for short-term analyses (one year, one month, or one day). As such, we do not believe use of this model is appropriate for a 15-year cost-benefit analysis.

## **CONCLUSION**

We appreciate the opportunity to participate in the development of the RES impact reporting required under 216B.1691 Subd. 2e. We support the transparent reporting of costs associated with of Minnesota's renewable energy standard and solar energy standard. We look forward to working with parties to develop a sound and informative reporting structure.

Dated: January 27, 2014

Northern States Power Company

## CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota;

xx by email; or

xx by electronic filing.

**Docket No. E999/CI-11-852 RES Energy Cost Impact Reports**

Dated this 27<sup>th</sup> day of January 2014

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street  Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_11-852_Interested Parties
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	SPL_SL_11-852_Interested Parties
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	SPL_SL_11-852_Interested Parties
William A.	Blazar	bblazar@mnychamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	SPL_SL_11-852_Interested Parties
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	Suite 4800 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	SPL_SL_11-852_Interested Parties
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	SPL_SL_11-852_Interested Parties
Mark B.	Bring	mbring@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_11-852_Interested Parties
B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP	Suite 1500 50 South Sixth Street Minneapolis, MN 554021498	Electronic Service	No	SPL_SL_11-852_Interested Parties
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	SPL_SL_11-852_Interested Parties
Tammie	Carino	tcarino@GREnergy.com	Great River Energy	12300 Elm Creek Blvd.  Maple Grove, MN 55369-4718	Electronic Service	No	SPL_SL_11-852_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Douglas M.	Carnival		McGrann Shea Anderson Carnival	Straugn & Lamb 800 Nicollet Mall, Suite 2600 Minneapolis, MN 554027035	Paper Service	No	SPL_SL_11- 852_Interested Parties
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road  Meredith, NH 32535413	Electronic Service	No	SPL_SL_11- 852_Interested Parties
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Mark F.	Dahlberg	markdahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Curt	Dieren	cdieren@dgrnet.com	L&O Power Cooperative	1302 South Union Street PO Box 511 Rock Rapids, IA 51246	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Kristen	Eide Tollefson	HealingSystems@earthlink.net	R-CURE	P O Box 129  Frontenac, MN 55026	Paper Service	No	SPL_SL_11- 852_Interested Parties
Bob	Eleff		Regulated Industries Cmte	100 Rev Dr Martin Luther King Jr Blvd Room 600 St. Paul, MN 55155	Paper Service	No	SPL_SL_11- 852_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Fergen		Hennepin County Government Center CAO	A2000 300 S. Sixth Street Minneapolis, MN 55487	Paper Service	No	SPL_SL_11- 852_Interested Parties
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Lori	Frisk Thompson	lorift@cmmpa.org	Central MN MPA	459 S Grove St  Blue Earth, MN 56013	Electronic Service	No	SPL_SL_11- 852_Interested Parties
John	Fuller	john.fuller@senate.mn	MN Senate	75 Rev Dr Martin Luther King Jr Blvd Room G-17 St. Paul, MN 55155	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Paper Service	No	SPL_SL_11- 852_Interested Parties
Benjamin	Gerber	bgerber@mncchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Darrell	Gerber		Clean Water Action Alliance of Minnesota	308 Hennepin Ave. E.  Minneapolis, MN 55414	Paper Service	No	SPL_SL_11- 852_Interested Parties
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Bryan	Gower	N/A	APX, Inc.	224 Airport Parkway Suite 600 San Jose, CA 95110	Paper Service	No	SPL_SL_11- 852_Interested Parties
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	SPL_SL_11- 852_Interested Parties



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	SPL_SL_11- 852_Interested Parties
Tony	Hainault	anthony.hainault@co.henn epin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Bill	Heaney	billheaney@billheaney.com	IBEW Minnesota State Council	3931 Silver Lake Rd NE  St. Anthony Village, MN 55421	Electronic Service	No	SPL_SL_11- 852_Interested Parties
John	Helmers	helmers.john@co.olmsted. mn.us	Olmsted County Waste to Energy	2122 Campus Drive SE  Rochester, MN 55904-4744	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Jared	Hendricks	hendricksj@owatonnautiliti es.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Jessy	Hennesy	jessy.hennesy@avantener gy.com	Avant Energy	220 S. Sixth St. Ste 1300  Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Ashley	Houston			120 Fairway Rd  Chestnut Hill, MA 24671850	Paper Service	No	SPL_SL_11- 852_Interested Parties
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 58501	Electronic Service	No	SPL_SL_11- 852_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Larry	Johnston	lw.johnston@smmpa.org	SMMPA	500 1st Ave SW  Rochester, MN 55902-3303	Paper Service	No	SPL_SL_11- 852_Interested Parties
Nancy	Kelly	bademailnancyk@eurekarecycling.org	Eureka Recycling	2828 Kennedy Street NE  Minneapolis, MN 55413	Paper Service	No	SPL_SL_11- 852_Interested Parties
Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave  Lakeville, MN 55044	Paper Service	No	SPL_SL_11- 852_Interested Parties
Hank	Koegel	hank.koegel@edf-re.com	EDF Renewable Eenergy	10 2nd St NE Ste 400  Minneapolis, MN 55413-2652	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	SPL_SL_11- 852_Interested Parties
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	SPL_SL_11- 852_Interested Parties
Mark	Lindquist	N/A	The Minnesota Project	57107 422nd St  New Ulm, MN 56073-4321	Paper Service	No	SPL_SL_11- 852_Interested Parties
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Mike	McDowell		Heartland Consumers Power District	PO Box 248  Madison, SD 570420248	Paper Service	No	SPL_SL_11- 852_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dave	McNary	N/A	Hennepin County DES	701 Fourth Avenue South suite 700 Minneapolis, MN 55415-1842	Paper Service	No	SPL_SL_11- 852_Interested Parties
John	McWilliams	jmm@dairy.net.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817  La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Valerie	Means	valerie.means@lawmoss.com	Moss & Barnett	Suite 4800 90 South Seventh Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Brian	Meloy	brian.meloy@leonard.com	Leonard, Street & Deinard	150 S 5th St Ste 2300  Minneapolis, MN 55402	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Peder	Mewis	Peder.Mewis@senate.mn	Senate Energy, Util and Telecom Committee	Room 322, State Capitol 75 Rev. Dr. Martin Luther King Jr. Blvd. St. Paul, MN 55155-1606	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Stacy	Miller	stacy.miller@state.mn.us	Department of Commerce	State Energy Office 85 7th Place East, Suite 500 St. Paul, MN 55101	Electronic Service	No	SPL_SL_11- 852_Interested Parties
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	SPL_SL_11- 852_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Thomas L.	Osteraas	bademailthomasosteraas@leonard.com	Excelsior Energy	150 South 5th Street Suite 2300  Minneapolis, MN 55402	Paper Service	No	SPL_SL_11- 852_Interested Parties
Joshua	Pearson	N/A	enXco, Inc.	15445 Innovation Drive  San Diego, CA 92128	Paper Service	No	SPL_SL_11- 852_Interested Parties
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	Suite 801 25 West Main Street Madison, WI 537033398	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Kent	Ragsdale	kentragdsdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_11- 852_Interested Parties
John C.	Reinhardt		Laura A. Reinhardt	3552 26Th Avenue South  Minneapolis, MN 55406	Paper Service	No	SPL_SL_11- 852_Interested Parties
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Paper Service	No	SPL_SL_11- 852_Interested Parties
Trudy	Richter	trichter@rranow.com	Minnesota Resource Recovery Assn.	477 Selby Avenue  St. Paul, MN 55102	Paper Service	No	SPL_SL_11- 852_Interested Parties
Craig	Rustad	crustad@minnkota.com	Minnkota Power	1822 Mill Road PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL_11- 852_Interested Parties
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227  Madison, SD 57042	Electronic Service	No	SPL_SL_11- 852_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Raymond	Sand	rms@dairynet.com	Dairyland Power Cooperative	P.O. Box 8173200 East Avenue South  LaCrosse, WI 546020817	Electronic Service	No	SPL_SL_11-852_Interested Parties
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	SPL_SL_11-852_Interested Parties
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129  St. Paul, MN 55116	Electronic Service	No	SPL_SL_11-852_Interested Parties
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	15347 Boulder Pointe Road  Eden Prairie, MN 55347	Electronic Service	No	SPL_SL_11-852_Interested Parties
Dean	Sedgwick	N/A	Itasca Power Company	PO Box 457  Bigfork, MN 56628-0457	Paper Service	No	SPL_SL_11-852_Interested Parties
Andrew	Serri	aserri@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave.  Bismarck, ND 58503-0564	Electronic Service	No	SPL_SL_11-852_Interested Parties
Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	SPL_SL_11-852_Interested Parties
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201  St. Paul, MN 55104	Electronic Service	No	SPL_SL_11-852_Interested Parties
Erin	Stojan Ruccolo	ruccolo@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 220  Saint Paul, MN 55102-1125	Electronic Service	No	SPL_SL_11-852_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_11-852_Interested Parties
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_11-852_Interested Parties
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_11-852_Interested Parties
Steve	Thompson		Central Minnesota Municipal Power Agency	459 S Grove St  Blue Earth, MN 56013-2629	Paper Service	No	SPL_SL_11-852_Interested Parties
Douglas	Tiffany	tiffa002@umn.edu	University of Minnesota	316d Ruttan Hall 1994 Buford Avenue St. Paul, MN 55108	Electronic Service	No	SPL_SL_11-852_Interested Parties
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	SPL_SL_11-852_Interested Parties
Darryl	Tveitbakk		Northern Municipal Power Agency	123 Second Street West  Thief River Falls, MN 56701	Paper Service	No	SPL_SL_11-852_Interested Parties
Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800  Owatonna, MN 55060	Electronic Service	No	SPL_SL_11-852_Interested Parties
Paul	White	paul.white@prcwind.com	Project Resources Corp./Tamarac Line LLC/Ridgewind	618 2nd Ave SE  Minneapolis, MN 55414	Electronic Service	No	SPL_SL_11-852_Interested Parties
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_11-852_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas J.	Zaremba		WHEELER, VAN SICKLE & ANDERSON	Suite 801 25 West Main Street Madison, WI 537033398	Paper Service	No	SPL_SL_11- 852_Interested Parties