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June 26, 2014

—Via Electronic Filing—

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

RE: COMMENTS
IN THE MATTER OF THE INVESTIGATION INTO ENVIRONMENTAL AND
SOCIOECONOMIC COSTS UNDER MINN. STAT. § 216B.2422, SUBD. 3
DOCKET NO. E999/CI-00-1636

Dear Dr. Haar:

Enclosed for filing are the Comments of Northern States Power Company, doing business as Xcel Energy, in response to the Minnesota Public Utilities Commission's June 16, 2014 NOTICE OF COMMENT PERIOD ON AGENCIES' REPORT.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service lists.

Please contact me at james.r.alders@xcelenergy.com or (612) 330-6732 if you have any questions regarding this filing.

/s/

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c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

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Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE INVESTIGATION
INTO ENVIRONMENTAL AND
SOCIOECONOMIC COSTS UNDER MINN.
STAT. § 216B.2422, SUBD. 3

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COMMENTS

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Comments in response to the Commission's June 16, 2014 NOTICE OF COMMENT PERIOD ON AGENCIES' REPORT. The Notice seeks comments regarding the June 10, 2014 Report regarding the proposed scope and process of the investigation to update externalities values, submitted by the Minnesota Department of Commerce and the Minnesota Pollution Control Agency (Minnesota Agencies).

The Agencies proposed a scope and process to investigate both greenhouse gases and criteria pollutants, as follows:

Greenhouse Gases

- Examine only carbon dioxide (CO₂), and not other GHGs;
- Do not limit consideration of external damages to just those damages within Minnesota;
- Adopt the Federal Social Cost of Carbon (SCC) values, and specifically the SCC variant developed using a 3 percent discount rate. To the extent the Commission declines to adopt the SCC at this stage of the proceeding:
 - Retain a consultant to assist the Agencies in building the record on this topic;
 - Establish a set of required damages that parties should include in any proposed CO₂ estimates;

- Specify that any proposed externality values should be based on damage values;
- Require that proposed CO₂ value estimates must account for global damages; and
- Request that parties propose ways to update their preferred CO₂ value in the future.

Criteria pollutants

- Retain an expert to conduct analysis to estimate externality values and provide written testimony for a contested case proceeding;
- Do not limit consideration of external damages to just those damages within Minnesota;
- Examine non-human health impacts of criteria pollutants only if the expert has credible and accurate methods and models to do so; and
- Use a photochemical modeling approach to determine the most credible criteria pollutant externality values for electric generator emissions, unless it is too costly or time-consuming, in which case, a reduced form modeling approach should be used.

In summary, we generally agree with the framework proposed by the Agencies. Specifically, we concur that:

- There should be a contested case proceeding to examine the impacts of criteria pollutants;
- CO₂ should be the only GHG included in the investigation at this time; and
- The best approach to estimating the external cost of emissions is a marginal damage cost approach, defined as the social cost of emitting one more increment of a pollutant given current conditions.

However, we believe that:

- The Commission does not have a sufficient record upon which to adopt the Federal SCC as the externality value for CO₂ at this point in the proceeding;
- There are shortcomings and disputed facts with regard to the SCC proposal that need to be vetted, for which a contested case proceeding is the appropriate venue;
- The examination of CO₂ in the contested case proceeding should:

- Evaluate the interaction with the Environmental Protection Agency’s recently released proposed rules for GHG emissions from both new and existing power plants;¹
- Explore and recognize the uncertainties inherent with any established values, in order to:
 - Establish a *range* of values; and
 - Use the information developed to later guide the Commission in the way(s) it may choose to apply them to the resource planning process.
- While we concur that climate change is a global issue, this does not mean that the Commission cannot or should not evaluate CO₂ damages specific to Minnesota or the Upper Midwest. This issue is appropriately addressed in a contested case proceeding;
- The appropriate modeling methodology should be determined in the contested case proceeding based on the Commission’s expectation that the results are credible;
- The impacts from criteria pollutants should be limited to the state of Minnesota and within 200 miles of its borders, as in the original proceeding that established values; and
- The baseline from which to establish the impact of the next ton of pollution emitted must be based on current ambient air quality concentrations and other factors that affect damages, such as population density and distribution.

COMMENTS

A. The Record is Insufficient to Establish a CO₂ Value at this Time

We disagree with the Minnesota Agencies’ recommendation that the Commission adopt the Federal SCC at this point in the proceeding. The Commission does not have a sufficient record upon which to adopt the Federal SCC as the externality value for CO₂. There are shortcomings and disputed facts with regard to the SCC that need to be assessed, and for which a contested case proceeding is the appropriate venue.

¹ For **new** power plants, EPA’s proposed rule entitled *Standards of Performance for Greenhouse Gas Emissions From New Stationary Sources: Electric Utility Generating Units* was published in the Federal Register January 8, 2014. See: <https://www.federalregister.gov/articles/2014/01/08/2013-28668/standards-of-performance-for-greenhouse-gas-emissions-from-new-stationary-sources-electric-utility>. For **existing** power plants, EPA’s proposed rule entitled *Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units* was published in the Federal Register June 18, 2014. See: <https://www.federalregister.gov/articles/2014/06/18/2014-13726/carbon-pollution-emission-guidelines-for-existing-stationary-sources-electric-utility-generating>

Further, we believe the Commission needs to acknowledge and examine the uncertainties associated with establishing an externality value for climate change associated with CO₂ emissions, which may lead to the conclusion that a range of values is appropriate. Also, the Commission should examine the interaction of this proceeding with the EPA's proposed rules for GHG emissions from new and existing power plants. We believe that this examination will also provide the Commission insight into ways it may want to apply the values, once developed.

1. *The Commission's Rules Support a Contested Case When There are Disputed Facts*

Minn. R. 7829.1000 states:

If a proceeding involves contested material facts and there is a right to a hearing under statute or rule, or if the commission finds that all significant issues have not been resolved to its satisfaction, the commission shall refer the matter to the Office of Administrative Hearings for contested case proceedings, unless:

- A. all parties waive their rights to contested case proceedings and instead request informal or expedited proceedings, and the commission finds that informal or expedited proceedings would be in the public interest; or
- B. a different procedural treatment is required by statute.

In this circumstance, as described below, not all significant issues have been resolved. The Commission would benefit from the scrutiny of a contested case hearing prior to making its determination.

2. *The SCC has Significant Shortcomings and Disputed Facts*

Contrary to the Agencies' contention that the SCC is well-accepted and credible, the SCC has significant shortcomings and disputed facts that call into question its appropriateness for integrated resource planning, and make a contested case proceeding the most appropriate venue for discussion. We list some of these disputed facts below, while referring the Commission to our Office of Management and Budget comments on the SCC for more detail,² as well as those of the Edison Electric Institute³ and, the Class of '85 Regulatory Response Group.⁴

² See Xcel Energy comments to OMB at: <http://www.regulations.gov/#!documentDetail;D=OMB-2013-0007-0123>

³ See <http://www.regulations.gov/#!documentDetail;D=OMB-2013-0007-0141>

⁴ See <http://www.regulations.gov/#!documentDetail;D=OMB-2013-0007-0088>

- *The federal Office of Management and Budget (OMB) only recently took comment on the SCC for the first time (February 2014).* OMB received 140 comments, many of them critical of the assumptions, modeling methodology, and lack of transparency in the SCC development process. OMB has not yet released a response to the comments, but may revise the SCC methodology and values. Considering this, it would be premature to adopt the SCC at this time. However, if the Commission opens a contested case proceeding on CO₂ externality options and considers the SCC as one of the options, OMB's response to comments should become available during the timeframe of the contested case and could inform the Commission's deliberations.
- *The SCC was designed for cost-benefit analysis of proposed federal regulations.* In that context, a highly imprecise value may be preferable to no value at all. However, utility integrated resource planning is far different. Using an uncertain and provisional value like the SCC would have more concrete and relatively immediate impacts on utility ratepayers. The Commission should consider in a contested case proceeding whether it is appropriate to use the SCC outside of its intended purpose.
- *The SCC modelers and government agencies acknowledge, in the original (2010) SCC Technical Support Document, significant "uncertainty, speculation, and lack of information" embedded in the SCC values.* Specifically, they note uncertainties about: (1) future GHG emissions; (2) the effects of past and future emissions on the climate system; (3) the impact of changes in climate on the physical and biological environment; and (4) the translation of these environmental impacts into economic damages.⁵ Uncertainty at each step magnifies the next. These agencies conclude that "any effort to quantify and monetize the harms associated with climate change will raise serious questions of science, economics, and ethics and should be viewed as provisional."⁶ These uncertainties have not been reduced in the more recent (May 2013 and November 2013) updates to the SCC, which retain the same assumptions and methodology.
- *The three Integrated Assessment Models (IAMs) on which the SCC is based provide vastly disparate values.* The 3 percent discount rate SCC value that the Minnesota Agencies recommend for adoption is simply the mean (average) across the three IAMs. Statisticians have argued that using the mean places undue weight on the extreme outliers in these long-term (300 year) projections, and that the

⁵ February 2010 Technical Support Document: *Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12866* (TSD 2010), at page 2. <http://www.whitehouse.gov/sites/default/files/omb/inforeg/for-agencies/Social-Cost-of-Carbon-for-RIA.pdf>.

⁶ *Ibid*, page 2.

median would be a more appropriate indicator of the central tendency of the values. Again, these are disputed issues of fact that should be examined in a contested case proceeding.

- *Between the 2010 and 2013 reports, the SCC values increased by approximately 60 percent without opportunity for any significant public input on the assumptions, methodologies, or process by which this update occurred.*⁷ If the Commission adopts the SCC without a contested case, it would be hard to argue that the Commission should not accept future updates as well, which could lead to dramatic impacts on utility ratepayers, again without any opportunity for examination and discussion.
- *The SCC development process has been criticized by many as lacking in transparency.* The SCC was developed by an interagency working group of 12 federal agencies. Until late 2013, the only public comment periods were on rulemakings (for microwave ovens, metal halide lamps, etc.) in which the SCC was used – not opportunities for comment on the SCC methodology and values themselves – and certainly not on whether they are appropriate for a resource planning process. While OMB has now provided such an opportunity, the Minnesota Agencies are proposing the SCC be adopted before OMB has responded to those comments. Thus, we disagree that the SCC has been properly vetted at the federal level, and it has certainly not been vetted in Minnesota as a tool for utility resource planning.
- *The SCC is an estimate of global damages.* The OMB has indicated it is possible to derive a domestic SCC value, approximating the damages from climate change on the U.S. economy.⁸ If taken to a contested case proceeding, the Commission could consider this option, as well as further refinement of the value(s) to the Upper Midwest or to Minnesota.

⁷ May 2013 Technical Support Document: *Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12866* (TSD May 2013) at http://www.whitehouse.gov/sites/default/files/omb/inforeg/social_cost_of_carbon_for_ria_2013_update.pdf, and November 2013 Technical Support Document: *Technical Update of the Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12866* (TSD November 2013) at <http://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/technical-update-social-cost-of-carbon-for-regulator-impact-analysis.pdf>.

⁸ See letter of January 24, 2014 from OMB re: Request for Correction on the Technical Support Document “Social Cost of Carbon for Regulatory Impact Analysis under Executive Order 12866” (February 2010) and Technical Support Document “Social Cost of Carbon for Regulatory Impact Analysis under Executive Order 12866” (May 2013). OMB states that “... the U.S. benefit [of emission reductions] is about 7-10 percent of the global benefit, on average, across the scenarios analyzed. Alternatively, if the fraction of GDP loss due to climate change is assumed to be similar across countries, the domestic benefit would be proportional to the US share of global GDP, which is currently about 23 percent. On the basis of this evidence, the interagency workgroup determined that a range of values from 7 to 23 percent should be used to adjust the global SCC to calculate domestic effects.” See <http://www.whitehouse.gov/sites/default/files/omb/inforeg/ssc-rfc-under-iga-response.pdf>.

- *The SCC reports provide values calculated using 5 percent, 3 percent, and 2.5 percent discount rate values.* The Commission would need to consider which value(s) are appropriate. As noted by the Minnesota Agencies, the Commission previously adopted 3 and 5 percent discount rate values for CO₂.⁹ We believe that ultimately it is important for the Commission to establish a range, as it did for other externality values, rather than a single value as advocated by the Minnesota Agencies. This, too, should be examined in a contested case venue.

If the Commission were to adopt the SCC, the Commission would need to consider whether parties have provided a sufficient rationale for abandoning the earlier precedent and using only the 3% discount rate SCC value.

- *Minn. Stat. §216B.2422, Subd. 3 is silent on whether the CO₂ externality value should be focused on climate change damages in Minnesota or more broadly (regional, national, or global).* The U.S. Global Change Research Program's *National Climate Assessment*, released in May 2014, evaluates climate change impacts by region of the country, including the Upper Midwest.¹⁰ As part of the contested case proceeding, the Commission should consider whether the global SCC, a domestic SCC, or a new CO₂ externality value specific to the Upper Midwest is most appropriate for use in utility resource planning.

Although the Commission may ultimately decide to adopt the SCC in some form as its CO₂ externality value, a contested case proceeding provides the appropriate forum to develop the record that will allow the Commission to make an informed decision.

3. *The Examination of CO₂ Values Should Explore the Inherent Uncertainties*

As noted above, in the case of the Federal SCC, the assignment of environmental cost values to CO₂ emissions is inherently uncertain. The calculation depends heavily on forecasts of damages decades and centuries in the future. We do not raise this uncertainty as an argument against adopting *any* updated CO₂ externality value. Rather, we raise it as an argument for considering *all* available options in the context of a contested case proceeding.

It also argues for using – as the Commission did when it first adopted environmental cost values in 1997 – a *range of values* for CO₂, rather than a single value. From the Commission's initial adoption of externality values in the 1990s up through the latest update in May 2014, it has used low and high values, representing 5 percent and 3

⁹ January 3, 1997 *Order Establishing Environmental Cost Values*, at page 27. Docket No. E999/CI-93-583. See: http://mn.gov/puc/documents/puc_pdf_orders/004231.pdf.

¹⁰ See: <http://nca2014.globalchange.gov/report/regions/midwest>.

percent discount rate options. The adoption of a single CO₂ value (specifically the Federal SCC at a 3 percent discount rate, as advocated by the Minnesota Agencies) would be inconsistent with the Commission's long-standing practice of using a range.

4. *The Choice of an Externality Value Should Consider the Current State of CO₂ Regulations*

As the Commission is aware, the EPA recently released proposed regulations for CO₂ emissions from both new and existing power plants. EPA's schedule contemplates final regulations for both new and existing plants will be in place by mid-2015, with development of state implementation plans for the existing power plant Rule to follow. This establishes a clear timeframe on which CO₂ will become a regulated pollutant in Minnesota.

We accept the Agencies' position that CO₂ regulatory compliance costs and CO₂ externality values are different, and some externalized damages may remain even after a pollutant is regulated. However, we would also argue that the intent of EPA's recently released regulations is to internalize at least some of the externalized damages from CO₂ emissions. Thus, while regulations may not eliminate damages, they should reduce the magnitude of those damages.

We therefore believe that it is logical for the Commission to consider whether and to what extent EPA regulations internalize some of the damages from CO₂ emissions, and how the resulting externality values should take this into account. Again, a contested case proceeding is the appropriate venue for such examination and record development. The appropriate allocation of CO₂ control costs across regulatory compliance costs and externality costs raises issues that are likely to be contested, and for which the Commission has not yet established an adequate record of decision.

B. Criteria Pollutants

For criteria pollutants, we believe appropriate experts, engaged both by the Minnesota Agencies and by the other parties to this proceeding, should help determine the appropriate modeling methodology based on the Commission's expectation that the results are credible.

We believe that the impacts from criteria pollutants should be limited to the state of Minnesota and within 200 miles of its borders, as in the original proceeding that established values.

We believe the baseline from which to establish the impact of the next ton of pollution emitted must be based on current ambient air quality concentrations and other factors that affect damages, such as population density and distribution.

CONCLUSION

Xcel Energy respectfully requests that the Commission establish the scope of a contested case proceeding to include both criteria pollutants and carbon dioxide so that a full record can be developed to assist the Commission in updating its externality values.

Dated: June 26, 2014

Northern States Power Company

Respectfully submitted by:

/s/

JAMES R. ALDERS
STRATEGY CONSULTANT
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CERTIFICATE OF SERVICE

I, Theresa Sarafolean, hereby certify that I have this day served copies or summaries of the foregoing document on the attached list(s) 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 electronic filing

Docket No. E999/CI-00-1636

Dated this 26th day of June 2014

/s/

Theresa Sarafolean
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Douglas M.	Carnival		McGrann Shea Anderson Carnival	Straugn & Lamb 800 Nicollet Mall, Suite 2600 Minneapolis, MN 554027035	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
Kenneth A.	Colburn	kcolburn@symbioticstrategies.com	Symbiotic Strategies, LLC	26 Winton Road Meredith, NH 32535413	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	SPL_SL_0- 1636_2_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_0- 1636_2_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_0- 1636_2_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 1400	No	SPL_SL_0- 1636_2_Interested Parties
Brian	Draxten	bhdraxten@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380498	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Mike	Eggl	megg1@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58503	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Kristen	Eide Tollefson	HealingSystems@earthlink.net	R-CURE	P O Box 129 Frontenac, MN 55026	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Oncu	Er	oncu.er@avantenergy.com	Avant Energy, Agent for MMPA	220 S. Sixth St. Ste. 1300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Pam	Fergen		Hennepin County Government Center CAO	A2000 300 S. Sixth Street Minneapolis, MN 55487	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	Yes	SPL_SL_0- 1636_2_Interested Parties
Karlene	Fine	kfine@nd.gov	Industrial Commission of North Dakota	14th Floor 600 E. Boulevard Avenue, Dept. 405 Bismarck, ND 58505	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Cathy	Fogale	cfogale@otpc.com	Otter Tail Power Company	215 South Cascade Street PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Amy	Fredregill	amy@mrets.org	Midwest Renewable Energy Tracking System, Inc.	1885 University Avenue West, #315 St. Paul, MN 55104	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
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Darrell	Gerber		Clean Water Action Alliance of Minnesota	308 Hennepin Ave. E. Minneapolis, MN 55414	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
Benjamin	Gerber	bgerber@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties

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Bryan	Gower	N/A	APX, Inc.	224 Airport Parkway Suite 600 San Jose, CA 95110	Paper Service	No	SPL_SL_0- 1636_2_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_0- 1636_2_Interested Parties
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_0- 1636_2_Interested Parties
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
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John	Helmrs	helmrs.john@co.olmsted.mn.us	Olmsted County Waste to Energy	2122 Campus Drive SE Rochester, MN 55904-4744	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
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Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
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Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Paula	Johnson	paulajohnson@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_0- 1636_2_Interested Parties
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Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
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Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave Lakeville, MN 55044	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties

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Jeffrey L.	Landsman	jlandsman@wheelerlaw.com	Wheeler, Van Sickle & Anderson, S.C.	Suite 801 25 West Main Street Madison, WI 537033398	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
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Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_0-1636_2_Interested Parties
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Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	SPL_SL_0-1636_2_Interested Parties
Raymond	Sand	rms@dairynet.com	Dairyland Power Cooperative	P.O. Box 8173200 East Avenue South LaCrosse, WI 546020817	Electronic Service	No	SPL_SL_0-1636_2_Interested Parties

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Dean	Sedgwick	N/A	Itasca Power Company	PO Box 457 Bigfork, MN 56628-0457	Paper Service	No	SPL_SL_0-1636_2_Interested Parties
Tim	Silverthorn			1096 Kilburn Street St. Paul, MN 551031029	Paper Service	No	SPL_SL_0-1636_2_Interested Parties
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Darryl	Tveitbakk		Northern Municipal Power Agency	123 Second Street West Thief River Falls, MN 56701	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
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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_0- 1636_2_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_0- 1636_2_Interested Parties
Thomas J.	Zaremba	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	Suite 801 25 West Main Street Madison, WI 537033398	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties