



414 Nicollet Mall
Minneapolis, MN 55401

November 5, 2014

—Via Electronic Filing—

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

RE: PETITION
PROPERTY TRANSFER FROM ELECTRIC TO GAS OPERATIONS
DOCKET NO. E,G002/M-14-_____

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Petition for approval to transfer the Company's property at 435 James Avenue in St. Paul from the books of NSP Electric to NSP Gas.

Pursuant to Minn. Stat. § 216.17, subd. 3, we have electronically filed this document, and served copies of the summary on the parties on the attached service list.

If you have any questions regarding this filing please contact me at (612) 330-6064 or bria.e.shea@xcelenergy.com.

Sincerely,

/s/

BRIA E. SHEA
MANAGER, REGULATORY DOCUMENT CONTENT

Enclosures
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipshultz	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF PROPERTY TRANSFER
FROM ELECTRIC TO GAS OPERATIONS

DOCKET NO. E,G002/M-14- _____

PETITION

INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits this petition to the Minnesota Public Utilities Commission (Commission) to request approval for an accounting transfer and, in the alternative, approval of an Affiliated Interest transaction between NSP Electric and NSP Gas. In this transaction, the Company will transfer the property which it owns at 435 James Avenue in St. Paul from the books of NSP Electric to NSP Gas. The Company seeks an accounting order approving the transaction pursuant to Minn. Stat. § 216B.10 or, in the alternative, approval as an affiliated interest transaction under Minn. Stat. § 216B.48. The Company's proposal to transfer the property at 435 James Avenue is supported by the public interest because it is economical, efficient, and safe and avoids the need to acquire new property to support our gas operations.

I. SUMMARY OF FILING

A one-paragraph summary is attached to this filing pursuant to Minn. R. 7829.1300, subp. 1.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. R. 7829.1300, subp. 2, the Company has served a copy of this filing on the appropriate general service list, the Department of Commerce, and the

Antitrust and Utilities Division of the Office of the Attorney General. A summary of the filing has been served on all parties on the enclosed service list.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company, doing business as:
Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Kari L. Valley
Assistant General Counsel
Xcel Energy
414 Nicollet Mall, 5th Floor
Minneapolis, MN 55401
612-215-4526
kari.l.valley@xcelenergy.com

C. Date of Filing and Proposed Effective Date

The date of this filing is November 5, 2014.

D. Statutes Controlling Schedule for Processing the Filing

The Company requests the Commission to approve an accounting order for the transaction pursuant to Minn. Stat. § 216B.10. Minn. Stat. § 216B.10 does not state a specific timeframe for Commission action on an accounting petition. If the Commission determines the transaction is an affiliated interest transaction, the applicable statute is Minn. Stat. § 216B.48, which also does not state a specific timeframe for Commission action.

The property transfer between NSP Electric and NSP Gas was made on October 16, 2014. If the Commission determines Minn. Stat. § 216B.48 applies, this filing is being

submitted within 30 days of the transaction being executed consistent with the Commission's Order in Docket No. E,G999/CI-98-651.

E. Utility Employee Responsible for Filing

Bria Shea
Manager, Regulatory Document Content
Xcel Energy
414 Nicollet Mall, 7th Floor
Minneapolis, MN 55401
(612) 330-6064
bria.e.shea@xcelenergy.com

III. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, the Company requests that the following persons be placed on the Commission's official service list for this proceeding:

Kari L. Valley
Assistant General Counsel
Xcel Energy
414 Nicollet Mall, 5th floor
Minneapolis, MN 55401
kari.l.valley@xcelenergy.com

Tiffany Hughes
Records Analyst
Xcel Energy
414 Nicollet Mall, 7th Floor
Minneapolis, MN 55401
regulatory.records@xcelenergy.com

Any information requests in this proceeding should be submitted to Ms. Hughes at the Regulatory Records email address above.

IV. DESCRIPTION AND PURPOSE OF FILING

A. Background

The Company originally purchased the property at 435 James Avenue in 2000. The Company no longer needs the land to support operations at the High Bridge combined cycle generating facility.

While the property is no longer needed to serve our electric operations, it is uniquely situated to serve our gas operations at a time of significant infrastructure replacement and improvement. As noted in our recent petition in Docket No. G002/M-14-336, the Company is making progress with numerous projects to improve the integrity of our gas infrastructure pursuant to state and federal requirements. One of these

projects includes a four year, \$70 million initiative to replace 11.5 miles of 20 inch steel gas main in St. Paul. By replacing the older infrastructure with new pipeline, the Company will improve the reliability and safety of our system and enable future improvements in pipeline maintenance and inspections. The location of the parcel at 435 James is ideal for the placement of new above ground facilities required to implement these improvements.

The property at 435 James is situated adjacent to a section of pipeline that currently runs to Island Station, a neighboring property owned by a third party. The valves which operate the current section of pipeline are located at the Island Station site. The current pipeline and the valves which control it will be replaced and relocated to the 435 James Avenue property as a part of the improvement project. The new equipment is necessary for inline inspection of the pipeline. The new facilities will include a valve set as well as large above-ground structures to house a launcher and receiver. By continuing to use the James Avenue property in the gas operations, we can maximize our existing assets and avoid the need to acquire new land to build the necessary above-ground facilities.

B. Standard of Review

We file this petition for approval of this transaction pursuant to Minn. Stat. §§ 216B.10 and/or 216B.48, subd. 3, and related rules. In either instance, the standard of review is whether the transaction is reasonable and consistent with the public interest.¹

We recognize that there has been ambiguity about the application of Minn. Stat. § 216B.48 to transactions between two business units in the past.² In Docket No. 94-729, the Commission approved a settlement applying the affiliated interest statute to the transaction, noting the approval was not intended to set a precedent. In Docket No. 97-806, the Commission approved a transaction between two business units

¹ See *In the Matter of a Request by Northern States Power Company for Approval of the Accounting Treatment for a "Base Contract for the Short Term Sale and Purchase of Natural Gas" between NSP's Gas Utility Business Unit and NSP's Generation Business Unit*, Docket No. E,G002/AI-97-806, Order Approving Agreement at 2 (Oct. 23, 1997).

² See *In the Matter of a Request by Northern States Power Company for the Approval of Affiliated-Intetest Transactions Between NSP-Gas Utility and NSP Generation*, Docket No. E,G002/AI-94-729, Order Approving Settlement (August 16, 1995) and *See In the Matter of a Request by Northern States Power Company for Approval of the Accounting Treatment for a "Base Contract for the Short Term Sale and Purchase of Natural Gas" between NSP's Gas Utility Business Unit and NSP's Generation Business Unit*, Docket No. E,G002/AI-97-806, Order Approving Agreement (Oct. 23, 1997).

pursuant to Minn. Stat. § 216B.10 and declined to rule on the applicability of Minn. Stat. § 216B.48. In that case, the Commission determined that the standard of whether the transaction was reasonable and consistent with the public interest was the same under both statutes, and therefore did not need to reach the question of the applicability of Minn. Stat. § 216B.48.

In addition, a review of the legislative history of the statute does not provide any additional guidance regarding the legislature's intent.³ The affiliated interest statute is intended to prevent regulated operations from subsidizing unregulated operations—a circumstance not at issue here. Commission counsel outlined the same perspective in its review of the application of the affiliated interest statute in Docket No. E002/M-93-1253.⁴

We also recognize that the Department has held the position that some intra-Company transactions are subject to approval pursuant to Minn. Stat. § 216B.48.⁵ Based on the precedent noted above, it is unclear whether a transaction between two business units within the same public utility qualifies as an affiliated interest transaction pursuant to Minn. Stat. § 216B.48 and Minn. R. 7825.2200.

However, because the potential of subsidization between regulated and unregulated operations is not at issue and this is merely a transaction between the regulated gas and electric operations, we propose the Commission review this filing pursuant to its general accounting authority provided by Minn. Stat. § 216B.10, not the affiliated interest statute. Similar to the prior dockets, the standard for approval is the same in either case. In either case, Commission approval depends on a showing that the contract or agreement is reasonable and consistent with the public interest. As discussed further below, the transaction at hand is in the public interest because it is economical, efficient, and safe and avoids the need to acquire new property to serve our gas operations.

³ See *In the Matter of a Request by Northern States Power Company for Approval of the Accounting Treatment for a "Base Contract for the Short Term Sale and Purchase of Natural Gas" between NSP's Gas Utility Business Unit and NSP's Generation Business Unit*, Xcel Energy Reply Comments, Docket No. E,G002/AI-97-806 (August 21, 1997).

⁴ See *In the Matter of a Request by Northern States Power Company for Approval of the Accounting Treatment for a "Base Contract for the Short Term Sale and Purchase of Natural Gas" between NSP's Gas Utility Business Unit and NSP's Generation Business Unit*, Initial Petition Attachment 3-A, Docket No. E,G002/M-97-806.

⁵ See Department Comments (July 30, 1997), Docket No. E,G002/97-806 and Joint Offer of Settlement (June 28, 1995), Docket No. E,G002/M-94-729.

C. Filing Requirements

We include in this petition both the requirements for a miscellaneous tariff filing under Minn. R. 7825.1300 and the affiliated interest rule, Minn. Rule 7825.2200(B). The requirements of Minn. R. 7825.1300 are identified above. We specifically address the requirements of Minn. R. 7825.2200 (B) below. In addition, the information below satisfies the requirements of the Commission's procedures for affiliated interest filings as identified in Docket No. E,G999/CI-98-651.

1. Description of the Agreement

The Company transferred the property it owns at 435 James Ave. in St. Paul, Minnesota from the electric operations to our gas operations on October 16, 2014. NSPM Electric no longer has use for the property and the Gas Department wishes to take possession of the property for the purpose of placing above ground gas facilities on the site.

This asset was recorded to FERC Account 340, Other Production Land and Land Rights for \$297,837. The Company requests approval of its actions to transfer this asset at its current book value of \$297,837 from FERC Account 340 to FERC Account 365.1, Gas Transmission Plant Land and Land Rights.⁶ We have provided the supporting journal entries as Attachment A to this petition.

2. Copy of the Agreement

There is no formal contract, but rather a proposed transfer between the two business units.

3. List of all contracts or agreements outstanding between the petitioner and affiliated interest, the consideration received by the affiliated interest for such contracts or agreements, and a verified summary of the relevant cost records pertaining to the same;

⁶ Reference 18 CFR Conservation of Power and Water Resources, Subchapter C Accounts, Federal Power Act, Part 101 Uniform System of Accounts Prescribed for Public Utilities and Licensees Subject to the Provisions of the Federal Power Act, Electric Plant Instructions Number 12. Transfers of Property and Subchapter F Accounts, Natural Gas Act, Part 201 Uniform System of Accounts Prescribed for Natural Gas Companies Subject to the Provisions of the Natural Gas Act, Gas Plant Instructions Number 12. Transfers of Property.

The Commission previously approved a gas sales agreement between the two business units in Docket Nos. E,G002/AI-94-729. The Company notified the Commission of termination of the 1994 Agreement by letter dated March 18, 1996.

4. Summary Describing Why the Public Interest Supports the Agreement

The Company's proposed Agreement to transfer the property at 435 James Avenue is supported by the public interest because it is economical, efficient, and safe, maximizes an existing asset and avoids the need to acquire new property.

If the Gas Department did not have access to the parcel at 435 James Avenue, it would be required to install the new facilities at the neighboring Island Station property or on another property not yet acquired.

The Company does not own the Island Station property and only has an easement for access. The Island Station property is currently under development by another party and there are plans to build a commercial facility on it. Thus, any new gas facilities constructed at Island Station could be subject to relocation in the future.

Alternatively, the Gas Department could acquire new property for the facilities. However, the 435 James Avenue location is a shorter, more direct route than any other alternative and thus requires fewer miles of pipeline. In addition, the 435 James Avenue location allows the Company the potential to align future projects that may feed into the High Bridge combined cycle generating facility. The Company notes that the cost of constructing the new facilities at 435 James Avenue would be both logistically more expedient and less costly than either the Island Station or new property alternatives.

In addition to the benefits of expedience and cost savings, another advantage of using the property at 435 James Avenue for new gas facilities is increased safety. The property is in a safe location for new gas facilities as it would accommodate security features for the above ground equipment. The risk of potential damage from future work is also minimized by locating the facilities at 435 James Avenue.

Further, the Agreement facilitates the important work of the Distribution Integrity Management Program (DIMP) outlined in our recent petition in Docket No. G002/M-14-336. There we noted the Company's commitment and response to the federal "Call to Action" for the review, assessment, and prioritization of initiatives to address high- risk gas-utility assets, and we substantiated the reasonableness of the activities.⁷

⁷ See Company's Petition, Docket No. G002/M-14-336, August 1, 2014.

We noted that the benefits of these evaluation and replacement efforts are several-fold: immediate safety and reliability benefits to customers and the public, cost savings through economies of scale, comprehensive planning to preempt emergency replacements, efficient use of outside contractor services, efficient deployment of capital, and improved coordination with affected municipalities. We believe the same public benefits generated by the DIMP activities undertaken as a whole also support the reasonableness of the Company's proposed asset transfer.

5. Summary Regarding Competitive Bids

In this case, the gas operations were in the process of designing and implementing improvements and looking for sites to locate the new above ground facilities. Gas operations identified the site at the High Bridge combined cycle generating facility and noted its availability. Gas operations did not seek competitive bids to site the new facilities.

CONCLUSION

The Company respectfully requests approval of this Agreement which authorizes the transfer of a real property asset between two of the Company's business units and states the accounting treatment applied to certain costs and revenues related to the transaction.

The Company's proposal to transfer an unused asset from NSP Electric to NSP Gas is efficient and economical. The Company will seize a unique opportunity to repurpose an unused parcel for the immediate benefit of ratepayers and the public. In doing so, it provides numerous public benefits including increased safety and reliability and the facilitation of gas system improvements needed pursuant to the Company's integrity management plans.

Dated: November 5, 2014

Northern States Power Company

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
Dan Lipshultz	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY
FOR APPROVAL OF AN AFFILIATED
INTEREST AGREEMENT

DOCKET NO. E,G002/M-14- _____

PETITION

SUMMARY OF FILING

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or the Company), submits this Petition to the Minnesota Public Utilities Commission for approval for a property transfer between NSP Electric and NSP Gas. Under the Agreement, NSP Electric will transfer the property which it owns at 435 James Avenue in St. Paul to NSP Gas. The parcel is unused by NSP Electric and presents a unique opportunity to be repurposed for the immediate benefit of ratepayers and the public.

Account and Description	<u>Debit</u>	<u>Credit</u>
<i>Transfer of Land - Plant in Service</i>		
Debit: FERC Account 101 - Plant in Service (Utility Account 20374001) St. Paul - MN - Gas	\$ 297,837.09	
Credit: FERC Account 101 - Plant in Service (Utility Account 10340001) High Bridge Generation Plant - MERP		\$ 297,837.09
Journal Entry Total	\$ 297,837.09	\$297,837.09

Capital Asset Accounting
Intra-Company Asset Transfer Form

Prepared by: David Amans Date: October 16, 2014

Company: Northern States Power - Minnesota

Asset From:

Work Order Number: 11818573
Credit Amount: \$297,837.09
Business Segment: Electric Production
FERC Number: 10340001 - Other Prod Land Own in Fee
Power Plant Asset Location and State: High Bridge Generation Plant-MERP

Asset To:

Work Order Number: 11818573
Debit Amount: \$297,837.09
Business Segment: Gas Distribution
FERC Number: 20374001 - Dist Land Owned in Fee
Power Plant Asset Location and State: St Paul - MN - Gas

CERTIFICATE OF SERVICE

I, Tiffany Hughes, 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

Xcel Energy Miscellaneous Gas and Electric Service List

Dated this 5th day of November 2014

/s/

Tiffany Hughes

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
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	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
James J.	Bertrand	james.bertrand@leonard.com	Leonard Street & Deinard	150 South Fifth Street, Suite 2300 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
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	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Sandra	Hofstetter	N/A	MN Chamber of Commerce	7261 County Road H Fremont, WI 54940-9317	Paper Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue St. Paul, MN 55130	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Mark J.	Kaufman	mkaufman@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Avenue South Burnsville, MN 55337	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Thomas G.	Koehler	TGK@IBEW160.org	Local Union #160, IBEW	2909 Anthony Ln St Anthony Village, MN 55418-3238	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
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	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Miscl Electric and Gas

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	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Ron	Spangler, Jr.	rispangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Byron E.	Starns	byron.starns@leonard.com	Leonard Street and Deinard	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
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	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas
Lisa	Veith	lisa.veith@ci.stpaul.mn.us	City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Electronic Service	No	GEN_SL_Northern States Power Company dba Xcel Energy-Elec_Xcel Misc Electric and Gas