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May 1, 2009

PUBLIC DOCUMENT

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

RE: **PUBLIC Comments of the Minnesota Office of Energy Security**
Docket No. G002/M-08-1315

Dear Dr. Haar:

Attached are the PUBLIC Comments of the Minnesota Office of Energy Security (OES) in the following matter:

Petition for Approval of Changes in Contract Demand Entitlements of Northern States Power Company ("Xcel" or the "Company").

The petition was originally filed on October 31, 2008. An amendment to the petition was filed on December 30, 2008. The petitioner on behalf of Xcel is:

Allen D. Krug
Director, Regulatory Administration
Xcel Energy Services Inc.
414 Nicollet Mall--7th Floor
Minneapolis, MN 55401

The OES recommends that the Commission **withhold approval** of Xcel's petition for approval of demand entitlement changes as amended until the Company provides in reply comments additional information requested by the OES.

The OES is available to answer any questions the Commission may have.

Sincerely,

/s/ MARLON GRIFFING
Financial Analyst

MG/sm
Attachment



PUBLIC DOCUMENT

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

**PUBLIC COMMENTS OF THE
MINNESOTA OFFICE OF ENERGY SECURITY**

DOCKET No. G002/M-08-1315

I. SUMMARY OF XCEL ENERGY'S REQUEST

Pursuant to Minnesota Rules 7825.2910, subpart 2, and 7825.3100, subpart 9 and 7825.3200, Xcel Energy (Xcel or the Company) filed a demand entitlement petition (Petition) on October 31, 2008. On December 30, 2008, Xcel filed an amendment to its petition, updating information regarding the Fargo lateral project ("Project").

In its Petition, Xcel requests approval from the Minnesota Public Utilities Commission (Commission) to implement its proposed 2008-2009 Natural Gas Heating Season Supply Plan effective November 1, 2008. In the amended Petition the Company requests that adjustments in firm contract demand entitlements provisionally included in the Company's purchased gas adjustment ("PGA") be effective January 1, 2009. After incorporating the adjustments included in the amendment Xcel requests changes in its firm pipeline demand entitlement levels¹ as follows:

- increase its total Design-Day requirement by 1,288 dekatherms (Dth);
- increase the resources to meet the Design-Day requirement;
- increase its reserve margin by 10,786 Dth;
- change the Jurisdictional Allocations between Minnesota and North Dakota to reflect usage patterns; and
- change its Supply Reservation fees.

¹ The entitlement levels discussed in Xcel Energy's system filing are the combined entitlements for Xcel Energy's Minnesota and North Dakota jurisdictions. Minnesota's portion of the entitlements is the total combined entitlements times the Minnesota allocation factor discussed below. The OES has included OES Attachment 1, which shows the effect of the demand entitlement changes in the Minnesota jurisdiction.

Xcel also requests approval to recover certain Producer Demand and Storage costs in the Company's monthly PGA, effective with the November 1, 2008 billings. The proposal is a carryover of a plan first presented in the Company's 2007-2008 demand-entitlement filing, Docket No. G002/M-07-1395 (2007-2008 Demand Entitlement). The proposal reflects Xcel's assessment of which demand-entitlement costs associated with transportation capacity and third-party supply reservation levels should be assigned to interruptible customers.

II. OES ANALYSIS OF XCEL'S REQUEST

The Minnesota Office of Energy Security's (OES) analysis of the Company's request includes a description and an evaluation of the Company's demand-entitlement petition and the amendment. The OES separately discusses each part of the Company's request.

A. XCEL'S PROPOSED DESIGN DAY LEVELS

1. Xcel's Realignment of Customer Base

Xcel notes that it moved customers from several Design-Day demand areas to other demand areas between the 2007-2008 and 2008-2009 heating seasons. The Company states the movements were carried out to align demand better with the deliverable capacity used to serve each demand area in its natural gas service territory. Xcel says that the new alignment should produce better peak-day forecasts because demand and deliverable capacity are better matched than under the former scheme that was based on customers' location by county.

The OES observes that this shifting of customers among demand areas is a different kind of change than the revision of demand-area regions that Xcel carried out in 2005. The customer shifts are not a reason to abandon the demand areas as the basis of regression analysis, as discussed further in the next section of these comments.

2. Xcel Forecast Methods

The Company employed two methodologies to arrive at its estimate of its Design Day requirement. One is the Actual Peak Use per Customer Design Day (UPC DD), while the other is the Average Monthly Design Day (Avg. Monthly DD).

The UPC DD method employs a use-per-customer number of 1.57393 Dth on the Design Day, a value that the Company derived from usage data on Thursday, January 29, 2004, the coldest day in recent years. The OES notes that this usage value has been employed by the Company in demand entitlement dockets subsequent to 2004. The 1.57393 value is multiplied by estimates of total customers to arrive at the expected Design-Day demand. Thus, shifting customers among demand areas does not affect the aggregate forecasts produced by the UPC DD method because the total does not change.

The Avg. Monthly DD method is a statistical method that uses linear regression to estimate Design-Day demand. Because Xcel has performed regression analyses on each demand area for both residential and commercial customers, the coefficients used to estimate use per customer vary from region to region. Consequently, the shifting of the customers among the demand areas does affect the aggregate forecasts produced by the Avg. Monthly DD method. This issue is discussed in connection with the projected Minnesota Design-Day requirement in the next section.

Xcel Energy notes that it revised its demand-area regions, which are the basis of the regression input data, in 2005. The Company, therefore, has only 34 months of data available as inputs. The Company acknowledges this number of data points is less than the 60 months it would prefer to use in its statistical analysis, but notes that the regression's R-squared values, a measure of how well a particular regression "explains" the outcome of a regression, are above 95 percent for the most part.

Of the seven cases in the Xcel system where the R-squared values drop below the 95-percent threshold, one is for the residential class of customers and six are for the commercial class of customers. The customer counts in most of these area customer groups are small, which means outliers in the populations can have large impacts on the regression analyses and their explanatory value. Thus, it is not surprising that a few customer groups in a few areas have lower R-squared values. However, the lowest value for R-Squared is 84.29 percent, which still suggests that the Avg. Monthly DD method produces an acceptable forecast, provided that other aspects of the regression analysis are acceptable. The OES's review of Xcel's forecast method indicates that the analysis is acceptable.

The OES recommends that the Company continue to use the two methods to develop its Design-Day estimate. The OES also expects that Xcel Energy will continue to increase the number of data points in the Avg. Monthly DD method as they become available (the 34 data points in the instant docket are an increase from the 25 data points included in the 2007-2008 Demand Entitlement). Thus, this method is expected to improve in statistical reliability in coming demand entitlement filings as the data point numbers grow. In the meantime, the UPC DD provides a reasonable check on the results.

3. Xcel's Forecasts

Xcel projects that its system (Minnesota and North Dakota) Design-Day requirement will decrease by 3,285 Dth to 766,782 Dth in the 2008-2009 heating season. On the other hand, the Company's forecast of its Minnesota Design-Day requirement increases by 1,288 Dth to 685,005 Dth. The OES notes that the effect of Xcel's proposal to increase the Minnesota jurisdiction's Design-Day requirement by 1,288 Dth while the Xcel system's Design-Day requirement is decreasing by 3,285 Dth is to shift Design-Day responsibility from North Dakota to Minnesota.

Xcel's customer forecast shows the number of Minnesota customers decreasing by 2,651, from 431,503 in the 2007-2008 forecast to 428,852 in the 2008-2009 forecast, a decrease of 0.6 percent. The Company states that the projected customer decrease may seem to be inconsistent with the projected increase in the Minnesota Design-Day requirement. However, Xcel's position appears to be that shifts in customers among demand areas (since use per customer from one demand area to the next is not identical) have caused the total predicted usage for customers to increase sufficiently to offset the decline in total customers. Therefore, according to the Company, the projected 1,288 Dth increase in the Minnesota Design-Day requirement can be reconciled with the customer decrease that the comparison of the 2007-2008 and 2008-2009 forecasts shows.

Xcel states that the 2008-2009 forecasted count of 428,852 customers for Minnesota is an increase over the actual customer count for 2007-2008. However, Xcel does not provide the actual customer count for 2007-2008, so there is no way to confirm the Company's assertion.

Xcel's filing shows that the North Dakota customer count is forecasted to increase 0.8 percent to 45,875 in 2008-2009, up from 44,589 in 2007-2008. On the other, the forecasted usage for North Dakota for 2008-2009 is 81,777 Dth, 5.3 percent less than the 86,350 predicted for 2007-2008. Again, Xcel's position appears to be that realignment of customers within demand areas accounts for the customer number moving in the opposite direction of the usage number.

According to the petition, the consumption allocator for Minnesota for 2008-2009 is 89.34 percent, up from 88.79 percent the year before. This movement is consistent with the increase in usage forecasted for Minnesota and the decline in usage forecasted for North Dakota in the Xcel system.

The OES recommends withholding approval of the customer and usage forecasts for Xcel's system and for Minnesota. Although the OES certainly supports reasonable improvements in forecasting models, Xcel has not provided sufficient support explanation for the changes implicit in this filing. Thus, the OES requests that Xcel clarify how the realignment of customers among demand areas led to usage forecasts in Minnesota and North Dakota moving in the opposite direction of the respective customer forecasts. The OES also requests that Xcel state what its actual Minnesota customer count was for 2007-2008 and elaborate as to why it believes the actual number fell short of the forecasted number.

B. *CHANGES IN XCEL ENERGY'S DESIGN-DAY RESOURCES*

Xcel Energy's filing reflects changes in the resources used to meet its Design Day customer requirements.

1. Northern Natural Gas Company Entitlements

The majority of Xcel's firm pipeline transportation contracts are with Northern Natural Gas (Northern). Most of these contracts were put in place in 2007 and run through 2017. The mix of base and variable contracts Xcel negotiated at that time fit the Company's needs. The Company has not proposed altering these entitlements, a position the OES concludes is reasonable, provided that Xcel can confirm in its reply comments that the mix of these contracts still efficiently meets its customers' demands in its jurisdictions given its forecasts and allocations.

2. Viking Gas Entitlements

In the initial petition, Xcel planned to increase its contracts with Viking Gas Transmission Company (Viking) by a net of 15,209 Dth, even though it was turning back 22,159 Dth of backhaul capacity. The Company entered into a precedent agreement with Viking to acquire 37,668 Dth of additional firm transportation. The increase called for Viking to replace nine miles of 8-inch pipe with 12-inch pipe on the Fargo lateral that serves Dilworth, Minnesota, and Moorhead, Minnesota, as well as Fargo, North Dakota. According to the Company, adverse weather and regulatory filing requirements at the Federal Energy Regulatory Commission (FERC) prevented completion of the lateral project in time for the 2008-2009 heating season.² Xcel had expected the increased capacity to be in service on January 1, 2009. In the amended petition, the Company has removed the incremental Viking entitlement from the calculation of the PGA factor effective as of that date. Under the Company's proposal, Fargo lateral project capacity costs already recovered in November and December 2008 will be returned to customers through the annual true-up filing to be submitted September 1, 2009.

Xcel asserts that the delay in the Fargo lateral project will not affect reliability in the Moorhead/Fargo area that it is intended to serve. The capacity increase was secured primarily to provide for future growth. Nevertheless, the Company did acquire an additional 820 Dth of capacity through a capacity release arrangement and another 850 Dth of peaking supply from another source to serve the area, both of which are factored into the amended PGA calculations. Xcel also arranged for Viking to lower its minimum pressure at the Fargo town border station to allow greater volumes to be delivered down the Fargo lateral in emergency conditions. Xcel monitored the system load on December 15, 2008, when the temperature was an average of minus 14 degrees in the area, and concluded that the load projections were sufficient for a minus 33-degrees day.

The absence of the Fargo lateral also caused Xcel to modify its upstream capacity and capacity release plans. The Company incorporates the changes in its amended attachments. The net effect on demand costs for the Minnesota jurisdiction in the amended petition is [TRADE SECRET DATA HAS BEEN EXCISED]

² Viking has represented to Xcel that the project will be completed in time for the 2009-2010 heating season.

The OES concludes that the actions that Xcel has taken in its amended petition with regard to the reliability of its system are appropriate³ for the most part because the Company ceased charging customers for a project that does not exist and plans to return the November and December 2008 overcharges to customers. It is not clear if Xcel's proposal to refund the overcharges to customers includes interest. If it does not, the OES recommends that the Commission require Xcel to include interest beginning with November 2008 through the refund period. The modifications in its PGA to reflect the delay in the expansion of the Fargo lateral capacity also are suitable. The OES concludes that the changes in the Viking entitlements are reasonable.

C. CHANGE IN XCEL ENERGY'S RESERVE MARGIN

Xcel Energy has increased its projected Design Day reserve margin in Minnesota from 5.53 percent in 2007-2008 to 6.90 percent in the amended filing for 2008-2009 (down from 7.2 percent in the initial filing). See OES Attachment 1. Xcel Energy states that it bases its reserve margin on the firm resources necessary to meet projected firm customer demand plus the capability of either the largest pump at its Wescott facility used to vaporize LNG or at its St. Paul metro propane-air peak-shaving plant. The capacity decision reflects Xcel Energy's assessment of the most economical method of adding capacity to meet demand beyond the forecasted Design Day demand. The reserve margin balances ensuring reliability of supply on days of extreme cold weather with the likelihood of experiencing Design Day conditions.

The OES concludes that the Company's proposed total design-day entitlement level meets the needs of its projected number of firm customers. Reserve margins in the 5-7 percent range are typical. Therefore, the OES concludes that Xcel Energy's increase in the reserve margin is reasonable.

D. CHANGES IN XCEL ENERGY'S JURISDICTIONAL ALLOCATIONS

1. Increase in Minnesota Jurisdiction Allocation Factor

The previously noted increase in forecasted Minnesota usage and forecasted decrease in North Dakota usage is reflected in the new Minnesota Jurisdictional Allocation Factor. The factor is calculated by dividing the Design Day forecasted demand for Minnesota (721,506 Dth) by the same demand for the Company's system (819,598 Dth). The increase in the Minnesota demand forecast means that Minnesota's share of the forecasted demand entitlement increases. The Avg. Monthly DD results are used to update the allocation factor, which rose from 88.79 percent to 89.34 percent.

³ Xcel confirmed in an informal conversation that it did have to employ reduced pressure at the Fargo town border station on occasion during the 2008-2009 winter, but that measure was sufficient to ensure delivery of gas to all customers.

2. *Decrease in Minnesota Grand Forks Area Jurisdiction Allocation Factor*

The allocation factor for East Grand Forks, Minnesota, for Design Day demand in the Grand Forks Area Jurisdiction decreased from 14.80 percent to 14.37 percent. The decrease is a result of the Design Day forecasted demand for East Grand Forks declining relatively more than the decline in Design Day forecasted demand for the rest of the territory served by the Grand Forks area transmission-looping project.

3. *Decrease in Minnesota Fargo Area Jurisdiction Allocation Factor*

The Design Day allocation factor for Moorhead/Dilworth, Minnesota dropped from 21.75 percent to 21.58 percent for Design Day demand on the Fargo-Moorhead area looping project. The decrease is a result of the Design Day forecasted demand for Dilworth/Moorhead decreasing relatively more than the decrease in Design Day forecasted demand for the rest of the territory served by the transmission-looping project.

As indicated above, the OES has requested that Xcel explain its forecast further in reply comments. The OES will review Xcel's response and provide its recommendation subsequently.

E. *CHANGES IN XCEL ENERGY'S SUPPLIER RESERVATION FEES*

Xcel Energy notes that its Supplier Reservation fees have changed. **[TRADE SECRET DATA HAS BEEN EXCISED]** The new expense level reflects updated prices of the reservations. The OES requests that Xcel provide information in reply comments regarding the cost of the alternative service.

F. *XCEL ENERGY'S PGA COST RECOVERY PROPOSAL*

Xcel Energy proposes to reflect the costs associated with the revised demand entitlements in the amended petition in the PGA effective with January 1, 2009 billing cycles, given the need to adjust for the delay in the Fargo lateral project. The OES concludes that this effective date is reasonable.

G. *XCEL ENERGY'S PROPOSAL TO ASSIGN DEMAND COSTS TO INTERRUPTIBLE CUSTOMERS*

Xcel Energy states that interruptible sales customers are receiving the benefits of storage and balancing services on non-Design Days. Thus, a portion of these costs could justifiably be recovered from these customers. The Company, therefore, developed a proposal to make such an assignment of costs on a prospective basis and presented it in Comments in the Company's 2007-2008 Demand Entitlement filing. Commission action in that docket is pending.

The rationale for the proposal is that interruptible sales customers receive benefits from underground storage facilities and the services associated with pipeline balancing costs. The Company continues to support the proposal set forth in its 2007-2008 Contract Demand Entitlements filing. The OES notes that approximately 15.5 percent of storage capacity costs and 21.9 percent of pipeline balancing charges are allocated to interruptible sales customers in 2008-2009 under the plan. The proposed effective date of November 1, 2008 is unaffected by the amended petition.

The OES concluded in Comments dated October 7, 2008 that Xcel's proposal represents a systematic approach to determining when interruptible customers benefit from the services associated with demand costs. Therefore, the OES concluded that the proposal is reasonable. The OES position on the matter is unchanged in the current docket.

III. CONCLUSIONS AND RECOMMENDATIONS

The OES recognizes that Xcel Energy's Design-Day demand levels and the demand entitlement resources that support that demand level change periodically. The revisions reflect changes in usage patterns, contract prices, and so forth. The OES believes that the realignment of customers within demand areas is an attempt to improve the Company's usage forecasts. However, the OES requests that Xcel provide more detail as to how the realignment affected this year's forecasts and allocations. Therefore, the OES requests that Xcel provide further information, in reply comments, regarding how the realignment of customers among demand areas led to usage forecasts in Minnesota and North Dakota moving in the opposite direction of the respective customer forecasts. The OES also requests that Xcel state what its actual customer count was for 2007-2008 and elaborate on why it believes the actual number fell short of the forecasted number. Further, the OES requests that Xcel provide information in reply comments regarding the cost of supplier reservation fees.

Thus, the OES recommends that the Commission withhold approval of Xcel's petition for approval of its demand entitlement changes as amended until the requested information is supplied.

/sm

Docket No. G002/M-08-1315
Demand Entitlement Analysis--Minnesota Jurisdiction*

Northern States Power Company d/b/a Xcel Energy

Heating Season	Number of Firm Customers			Design-Day Requirement			Total Entitlement Plus Peak Shaving			Reserve Margin
	(1) Number of Customers	(2) Change from Previous Year	(3) % Change From Previous Year	(4) Design Day (Dth)	(5) Change from Previous Year	(6) % Change From Previous Year	(7) Total Design-Day Capacity (Dth)	(8) Change from Previous Year	(9) % Change From Previous Year	
2008-2009**	428,852	(2,651)	-0.61%	685,005	1,288	0.19%	732,291	10,785	1.49%	6.90%
2007-2008**	431,503	7,088	1.67%	683,717	5,984	0.88%	721,506	25,249	3.63%	5.53%
2006-2007	424,415	2,845	0.67%	677,733	6,887	1.03%	696,257	4,568	0.66%	2.73%
2005-2006	421,570	10,584	2.58%	670,846	21,191	3.26%	691,689	16,569	2.45%	3.11%
2004-2005	410,986	9,353	2.33%	649,655	46,187	7.65%	675,120	31,805	4.94%	3.92%
2003-2004	401,633	5,826	1.47%	603,468	(4,388)	-0.72%	643,315	1,040	0.16%	6.60%
2002-2003	395,807	10,913	2.84%	607,856	3,383	0.56%	642,275	1,928	0.30%	5.66%
2001-2002	384,894			604,473			640,347			
Average:			1.56%			1.84%			1.95%	4.92%

Firm Peak-Day Sendout

Heating Season	Firm Peak-Day Sendout (Dth)	Change from Previous Year	(12) % Change From Previous Year	(13) % Change From Previous Year	(14) Excess per Customer [(7) - (4)]/(1)	(15) Design Day per Customer (4)/(1)	(16) Entitlement per Customer (7)/(1)	(17) Peak-Day Send per Customer (11)/(1)
2008-2009	601,425	15,551	2.65%	2.65%	0.1103	1.5973	1.7076	1.4024
2007-2008	585,874	16,911	2.97%	2.97%	0.0876	1.5845	1.6721	1.3578
2006-2007	568,963	31,303	5.82%	5.82%	0.0436	1.5969	1.6405	1.3406
2005-2006	537,660	286	0.05%	0.05%	0.0494	1.5913	1.6407	1.2754
2004-2005	537,374	(23,876)	-4.25%	-4.25%	0.0620	1.5807	1.6427	1.3075
2003-2004	561,250	26,865	5.03%	5.03%	0.0992	1.5025	1.6017	1.3974
2002-2003	534,385	57,882	12.15%	12.15%	0.0870	1.5357	1.6227	1.3501
2001-2002	476,503				0.0932		1.6637	
Average			3.49%	3.49%	0.0790	1.5699	1.6353	1.3473

*-Some numbers may differ from Xcel Attachments due to rounding
**-Reflects the UPC DD method.

CERTIFICATE OF SERVICE

I, Jan Mottaz, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Office of Energy Security Comments

Docket No. G002/M-08-1315

Dated this 1st day of May, 2009.

/s/jan mottaz

G002/M-08-1315

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