



414 Nicollet Mall  
Minneapolis, Minnesota 55401-1993

April 29, 2011

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

- VIA ELECTRONIC FILING -

Re: REPLY  
HIAWATHA TRANSMISSION LINE PROJECT  
Docket No. E002/CN-10-694

Dear Dr. Haar:

Enclosed is Xcel Energy's Reply in the above referenced docket. If you have questions or need additional information, please contact me at 612-330-6750.

This filing is being served on those persons on the attached service list.

Sincerely,

/S/

Mark Suel  
Regulatory Affairs

Enclosures

c: Service Lists

**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

Ellen Anderson	Chair
David Boyd	Commissioner
J. Dennis O'Brien	Commissioner
Phyllis Reha	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF THE APPLICATION  
FOR A CERTIFICATE OF NEED FOR TWO  
115 kV HIGH VOLTAGE  
TRANSMISSION LINES IN THE MIDTOWN  
AREA OF SOUTH MINNEAPOLIS,  
HENNEPIN COUNTY: HIAWATHA  
PROJECT

DOCKET No. E002/CN-10-694

**XCEL ENERGY'S REPLY COMMENTS**

**I. INTRODUCTION**

Northern States Power Company, a Minnesota corporation ("Xcel Energy"), submits this response to the Comments of the Minnesota Department of Commerce Division of Energy Resources ("Department") in the above-captioned matter. Xcel Energy appreciates the Department's review and is pleased that the Department recommends approval of our request for a Certificate of Need for the Hiawatha Project.

Xcel Energy also appreciates Department's comments regarding potential underground design and the associated issue of cost allocation. Resolution of these issues has been and remains the primary concern of governmental and community stakeholders. While the Administrative Law Judge ("ALJ") has recommended an underground route in the Route Permit proceeding, the Commission will not make its routing decision until the Certificate of Need proceeding is complete and will not place final costs in rates until there is a subsequent proceeding (Transmission Cost Recovery rider and/or rate case). As a result, there could be significant uncertainty regarding how the costs of the Project would be distributed among customers if the Commission grants a Route Permit for underground facilities.

In its comments, the Department suggests several questions for the Company to comment on regarding the cost responsibility and method of payment applicable to

the Hiawatha Project. The Department clearly understands the importance of these issues for this project. The Company believes that given the unique circumstances presented with the Hiawatha Project that it would be appropriate for the Commission to remove any uncertainty and provide specific guidance about cost recovery in its Certificate of Need and/or Route Permit decisions. Such clarification will serve to benefit all parties to these dockets and help address stakeholder concerns. Further, this will avoid potential impacts on construction schedules for the project that would occur if the cost responsibility was not fully understood at the conclusion of the Certificate of Need and Route Permit proceedings.

In these reply comments, Xcel Energy specifically responds to the following Department recommendations and/or comment requests:

- 1) That questions as to which set(s) of customers should pay for any undergrounding be decided in a rate case.
- 2) That Xcel Energy provide information in this docket and in the current rate case proceeding whether any cost of the proposed line is included for recovery in the current rate case proceeding<sup>1</sup> and, if so, specify amounts in each component of the rate case and, if not then state when Xcel Energy expects to recover such costs.
- 3) That the Commission require Xcel Energy to provide information as to which set(s) of customers Xcel Energy proposes to charge for undergrounding costs in the relevant rate proceedings.

## II. REPLY

### 1) **What Forum Should be used to Determine Which Set(s) of Customers Should Pay for any Undergrounding of Transmission Facilities that May be Decided in this Case?**

In its comments, the Department stated that a rate case proceeding is the proper forum for deciding which set(s) of customers should pay for any undergrounding of transmission facilities that may be decided in this case. We agree with the Department that the review of cost amounts and setting of rates to customers is a matter for a rate case (and/or a Transmission Cost Recovery Rider) proceeding; however, in order to be able to make that review and set the appropriate rates it must be clearly understood which customers are responsible for the costs. As

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<sup>1</sup>In the Matter of the Application of Northern States Power Company, a Minnesota corporation, for Authority to Increase Rates for Electric Service in Minnesota, Docket No. E-002/GR-10-971.

will be discussed later, the Company's Minnesota Electric Rate Book-MPUC No. 2 ("Tariff") is not definitive as to which set(s) of customers should pay for underground transmission facilities. We conclude the question of how to distribute costs to customers revolves around, and is inextricably tied to, how the Commission views the purpose of placing the line underground if the Commission accepts the ALJ's recommendation.<sup>2</sup> Therefore, the Company believes that the Commission should provide guidance for the Hiawatha project at a policy level in either this Certificate of Need docket or the Route Permit proceeding, or both. Clarification and direction from the Commission on this will serve to benefit all parties to these dockets and help address stakeholder concerns. Further, this will avoid potential impacts on construction schedules for the project that would occur if the cost responsibility were not fully understood at the conclusion of this Certificate of Need and Route Permit proceedings. As a practical matter all of the information necessary in order for the Commission to provide guidance concerning how to distribute mitigation costs will be available in these two dockets before the Commission.

**2) Are Costs of the Proposed Line in the Current Rate Case? If not then when does Xcel Energy expect to recover such costs?**

At the time of the preparation of the Company's budget for the 2011 calendar year, we believed that it was possible to complete a portion of the substation work for this Project and have it placed in service in 2011. As a result, the current electric rate case was filed with an expectation that approximately \$5.9 million of substation facilities for the Hiawatha Project would achieve plant in service status late in 2011.<sup>3</sup>

As both the instant case and the concurrent electric rate case proceeded, it became clear that due to the timing of the completion of the Certificate of Need and Route Permit proceedings for the Hiawatha Project, significant work could not be completed in 2011. Consequently, the 2011 budget for the project was modified to shift significant project expenditures out to 2012 and beyond. At the current time, the Company is budgeting to spend approximately \$0.5 million on the Project in 2011 and

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<sup>2</sup> The ALJ reasoned: "Although the cost of Route D [underground] is greater than the other alternatives, the factors favoring an underground transmission line in an urban area as densely populated as the Project Area justify the added expense to offset the human and environmental impact of the overhead alternatives." *In the Matter of the Application for a Route Permit for the Hiawatha Line Project*, OAH Docket No. 15-2500-2-599-2, PUC No. ET2/TL-09-38, p. 96 ( Oct. 8, 2010).

<sup>3</sup>See Docket No. E002/GR-10-971 Pre-filed Direct Testimony of Ian Benson, Exhibit \_\_ (IRB-1), Schedule 8.

no cost expenditures for the Hiawatha project are expected to achieve plant in service status this year.

Therefore, as a result of the 2011 budget modifications for the Hiawatha Project, Company witness Anne Heuer is sponsoring rebuttal testimony that will remove all cost recovery amounts from the current electric rate case.

### **3) Which Set(s) of Customers Xcel Energy Proposes to Charge for Undergrounding Costs?**

Route Permit decisions typically determine where Xcel Energy will build facilities and what design will be used. However, Route Permit decisions have not explicitly addressed cost allocation. Rather, rate recovery has been determined in a subsequent Transmission Cost Recovery rider and/or rate case. For the Hiawatha Project, this means that underground construction could be approved without an understanding of how the costs will be assigned.

The Company recognizes that the Commission will actually place project revenue requirements in rates in a TCR Rider or rate case proceeding. However, given the particular circumstances of the Hiawatha Project and the broad stakeholder interest, the Company recommends that the Commission's orders for the Hiawatha Project provide guidance with regard to the central underlying policy issue in the Commission's Certificate of Need and Route Permit orders. At one end of the spectrum the Commission could conclude the human and environmental settings of the Project require impact mitigation that results from placing the line underground and it is appropriate for all ratepayers to share in that mitigation cost. At the other end of the spectrum, the Commission could view the aesthetic benefits of placing the line underground unnecessary mitigation and therefore a cost the community can elect to undertake. These judgments are part and parcel of the Commission's Route Permit determination. To assist the Commission in making this policy decision, we provide the following discussion of the key provisions of our special facilities Tariff, an example of how undergrounding costs for a recent transmission project were treated, and a discussion of how the Tariff might apply to the Hiawatha Project.

#### **Transmission Facility Cost Allocation—Who Pays**

##### **A. Xcel Energy's Relevant Tariff Provisions.**

Xcel Energy charges its customers, or subset(s) of customers, for the costs of a transmission project, including substation and distribution costs, according to the terms of the Company's special facilities Tariff. The means of cost recovery for new

facilities is dependent on the facilities classification as “Standard Facilities” or “Special Facilities.”

The term “Standard Facilities” is defined as:

those facilities whose design or location constitute the reasonable and prudent, least-cost alternative that is consistent with the existing electric system configuration, will meet the needs of the Company’s customers and will maintain system reliability and performance under the circumstances. In determining the design or location of a “Standard Facility”, the Company shall use good utility practices and evaluate all of the circumstances surrounding the proposal, including (i) public and employee safety in the installation, operation and maintenance of the facility, (ii) compliance with the National Electrical Safety Code, other applicable engineering standards and electric utility norms and standards, (iii) electric system reliability requirements, (iv) the presence, age, condition and configuration of existing facilities in the affected area, (v) the presence and size of existing right-of-way in the affected area, (vi) existing topology, soil, spacing, and any environmental limitations in the specific area, (vii) existing and reasonably projected development in the affected area, (viii) installation, maintenance, useful life and replacement cost factors, and (ix) other relevant factors under the particular circumstances.<sup>4</sup>

“Special Facilities” are defined as “non-standard facilities or the non-standard design or location of facilities” as provided in the paragraph above.<sup>5</sup>

The costs of standard transmission facilities would be recovered through Attachment O of the Midwest Independent System Operator (“MISO”) tariff. This transmission cost recovery portion of the MISO tariff defines how the local transmission costs are allocated to the load within the transmission owner’s “pricing zone.” Northern States Power Company, a Minnesota corporation, and its sister utility, Northern States Power Company, a Wisconsin corporation (“NSPW”), together own and operate 7,300 miles of transmission facilities in five states Minnesota, North Dakota, South Dakota, Wisconsin and Michigan, known as the

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<sup>4</sup>Tariff, Section 6, Rules 5.3(A)(5), Sheet 6-27.1.

<sup>5</sup>Tariff, Section 6, Rules 5.3 (A)(6), Sheet 6-27.1.

NSP System. The pricing zone for Xcel Energy (“NSP Pricing Zone”) includes the NSP System load, Great River Energy’s load, and Southern Minnesota Municipal Power Agency’s load. For the NSP Pricing Zone, the bulk of the capacity is used by NSP System customers (wholesale and retail). Therefore, approximately 90% of the costs of local transmission facilities under Attachment O are paid for by the retail and wholesale load customers across the NSP System.

If a facility is a Special Facility, generally the difference in costs between the Standard Facility and the Special Facility (“Excess Expenditure”) is borne by the customer or group of customers who requested or required the Company to incur the Excess Expenditure. In all cases, the recovery is subject to the oversight of the Commission.

#### B. Prior Practice.

In its Route Permit approval role, the Commission directs project proponents to construct facilities in a particular manner within a particular route. Route Permit orders specify the location, general design (overhead/underground) and specific design of the facilities, e.g. finish of overhead poles. When projects are constructed in accordance with a Certificate of Need and Route Permit, the Company has sought recovery for such costs in a TCR proceeding and/or a rate case as Standard Facilities under the Tariff. In the absence of explicit guidance the Company has assumed the Commission views all of the components of the design and location specified in its Route Permit as necessary mitigation of the impact of the line. As such, all the costs of transmission projects have been recovered from all of Xcel Energy’s ratepayers.

The Chisago Project<sup>6</sup> referenced by Department is a recent example of this practice in the case of an underground installation. As part of the Chisago Project, the Company proposed to replace an existing 69 kV transmission line with an underground 161 kV transmission line from County State Aid Highway 20 through Trunk Highway 95 in Taylors Falls. The Commission approved this design when it granted a Certificate of Need and Route Permit for the project.<sup>7</sup> The Commission subsequently approved an extension of the undergrounded portion of the Chisago

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<sup>6</sup>Docket No. E002/CN-04-1176 and No. E002/TL-06-1677.

<sup>7</sup>In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy and Dairyland Cooperative for a Certificate of Need for a 115 kV and 161 kV Transmission Line from Taylors Falls to Chisago County and Petition of Northern States Power Company d/b/a Xcel Energy and Dairyland Cooperative for a Route Permit for a 161 kV Transmission Line from Taylors Falls to Chisago County, *Order Granting Certificate of Need, Granting Route Permit, and Deferring Action on Portion of Route Permit Application Pending Negotiations and Further Filings and Route Permit*, Docket Nos. E002/CN-04-1176 and E002/TL-06-1677, p. 2 (Feb. 20, 2008) (“Chisago Dockets”).

Project.<sup>8</sup> The costs of all undergrounding were treated as Standard Facilities for purposes of rate recovery, which treatment the Commission approved in TCR dockets.<sup>9</sup> Conversely, the Commission declined to accept recommendations that the line be placed underground through Lindstrom.

### C. Hiawatha Docket.

While the Chisago case suggests that all costs of an underground design approved in a Route Permit would be recovered as Standard Facilities, the Commission has not expressly made such a ruling in any docket. Also, the Tariff does not specifically define Standard Facilities to include all facilities approved by the Commission. Therefore, the possibility exists that an underground design could be approved in the Route Permit proceeding, but that some of the costs may later be determined to be associated with Special Facilities. We believe such uncertainty would create additional stakeholder concerns and potentially delay construction schedules while the uncertainty is resolved. If the Commission views some portion of the facility as “Special” it will be necessary to reach agreement on a funding agreement before the Project can proceed and service reliability concerns in south Minneapolis can be addressed. The question of impact mitigation is at the core of the Route Permit proceeding and the question of cost responsibility among customers is inextricably tied to the Commission’s view of mitigation. We believe it would be in all stakeholders’ best interest to provide explicit guidance concerning the extent to which the Commission’s mitigation decisions should be interpreted as “Standard” or “Special” in the terminology of the special facilities Tariff.

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<sup>8</sup>Commission’s letters dated August 10, 2009 and November 4, 2009 approving Company’s Compliance Filings and confirming facilities proposed to be constructed are in compliance with the Commission’s Route Permit Order dated June 30, 2008 approving and adopting city of Lindstrom and Xcel Energy joint compliance filing for the Chisago transmission project.

<sup>9</sup>Petition for approval of 2009 TCR project eligibility, TCR rate factors, Continuation of deferred accounting, and 2008 true up report, E002/M-08-1284 (2009), *Order Approving Xcel Energy's petition for TCR Project Availability, TCR rate factors as revised in the Company's February 19, 2009 reply comments, deferred accounting request, and 2008 True-up Report* (also approving cost of undergrounding 161 kV facilities through the land district within the Lower St. Croix National Scenic Riverway) (June 25, 2009). In the Matter of the Northern States Power Company, a Minnesota Corporation, for Approval of a Modification to its TCR Tariff, 2010 Project Eligibility, TCR Rate Factors, Continuation of Deferred Accounting and 2009 True-up Report, E002/M-09-1048 (2010), *Order Approving Project Eligibility and Rider, 2009 TCR Tracker Report, and TCR Rate Factors* (also approving cost of undergrounding of distribution facilities in Lindstrom) (April 27, 2010).



### III. CONCLUSION

Xcel Energy respectfully requests that the Commission grant a Certificate of Need for the Hiawatha Project and provide policy direction on how Project costs ought to be recovered under Xcel Energy's Tariff.

If you have questions or need additional information, please contact Mark Suel at 612-330-6750. Copies of this filing have been served on those parties on the attached service list.

SINCERELY,

/s/

PAUL J LEHMAN

**Manager, Regulatory Administration**

Enclosure

c: Service List

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## CERTIFICATE OF SERVICE

I, Mark Suel hereby certify that I have this day served copies of the foregoing document on the attached list of persons electronically, delivery by hand or by causing to be placed in the U.S. mail at Minneapolis, Minnesota.

**DOCKET No.** E002/CN-10-694

Dated this 29<sup>th</sup> day of April, 2011

/s/

Mark Suel

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Agrimonti	lagrimonti@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 South 8th Street  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-694_Official
Julia	Anderson	Julia.Anderson@state.mn.us	Office of the Attorney General-DOC	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	OFF_SL_10-694_Official
Douglas	Benson	douglas.benson@state.mn.us	Department of Health	PO Box 64975  Saint Paul, MN 55155	Electronic Service	No	OFF_SL_10-694_Official
James J.	Bertrand	james.bertrand@leonard.com	Leonard Street & Deinard	Suite 2300 150 South Fifth Street Minneapolis, MN 55402	Paper Service	No	OFF_SL_10-694_Official
Steven	Bosacker		City of Minneapolis	City Hall, Room 301M 350 South Fifth Street Minneapolis, MN 554151376	Paper Service	No	OFF_SL_10-694_Official
Christopher	Clark	christopher.b.clark@xcelenergy.com	Xcel Energy	5th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Paper Service	No	OFF_SL_10-694_Official
Corey	Conover	corey.conover@ci.minneapolis.mn.us	City Of Minneapolis	350 South 5th Street City Hall, Room 210 Minneapolis, MN 554022453	Electronic Service	No	OFF_SL_10-694_Official
Jeffrey A.	Daugherty	jeffrey-daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Paper Service	No	OFF_SL_10-694_Official
Patricia	DeBleekere	tricia.debleeckere@state.mn.us	Public Utilities Commission	Suite 350 121 Seventh Place East  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_10-694_Official
Randall	Doneen	randall.doneen@dnr.state.mn.us	Department of Natural Resources	500 Lafayette Road  St. Paul, MN 55155	Electronic Service	No	OFF_SL_10-694_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lori	Ellis	Lori.ellis@learth.org	Little Earth of United Tribes	2495 18th Avenue S  Minneapolis, MN 55404	Paper Service	No	OFF_SL_10-694_Official
Ron	Elwood	relwood@mnsap.org	Legal Services Advocacy Project	2324 University Ave Ste 101  St. Paul, MN 55114	Electronic Service	No	OFF_SL_10-694_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_10-694_Official
Jeff	Freeman	Jeff.Freeman@state.mn.us	DEED	1st National Bank Bldg 332 Minnesota St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_10-694_Official
Travis	Germundson	travis.germundson@state.mn.us		520 Lafayette Rd  Saint Paul, MN 55155	Electronic Service	No	OFF_SL_10-694_Official
Bradley	Gunn	bjg@mgmlp.com	Malkerson Gunn Martin LLP	1900 U.S. Bank Plaza South 2200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-694_Official
Eric	Gustafson	eric@corcoranneighborhood.org	Corcoran Neighborhood Organization	3451 Cedar Ave S  Minneapolis, MN 55407	Electronic Service	No	OFF_SL_10-694_Official
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	No	OFF_SL_10-694_Official
Karen Finstad	Hammel	Karen.Hammel@state.mn.us	Office of the Attorney General-DOC	1400 BRM Tower 445 Minnesota Street St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_10-694_Official
Eric	Hart	hart3151@tcq.net	Longfellow Community Council	2727 26th Avenue South  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_10-694_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Leslie	Hayashida	Leslie.M.Hayashida@wellsfargo.com	Wells Fargo & Company	Sixth & Marquette  Minneapolis, MN 55479	Electronic Service	No	OFF_SL_10-694_Official
Valerie	Herring	vherring@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-694_Official
Beverly	Heydinger	beverly.heydinger@state.mn.us	Office of Administrative Hearings	PO Box 64620  St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_10-694_Official
Shirley	Heyer	shirleymidtownphillips@msn.com	Midtown Phillips Neighborhood Association, Inc.	2426 13th Ave. S.  Minneapolis, MN 55404	Electronic Service	No	OFF_SL_10-694_Official
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_10-694_Official
Mara	Koeller	mara.n.koeller@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_10-694_Official
Karen	Kromar	karen.kromar@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd  Saint Paul, MN 55155	Electronic Service	No	OFF_SL_10-694_Official
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_10-694_Official
Robert S	Lee	RSL@MCMLAW.COM	Mackall Crouse & Moore Law Offices	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 554022859	Paper Service	No	OFF_SL_10-694_Official
Paul J.	Lehman	paul.lehman@xcelenergy.com	Xcel Energy	414 Nicollet Mall  Minneapolis, MN 554011993	Paper Service	No	OFF_SL_10-694_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Lindell	agorud.ecf@state.mn.us	Office of the Attorney General-RUD	900 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_10-694_Official
Paula	Maccabee	Pmaccabee@visi.com	Just Change Law Offices	1961 Selby Avenue  St. Paul, MN 55104	Paper Service	No	OFF_SL_10-694_Official
Sheldon	Mains	smains@visi.com	Seward Neighborhood Group, Incorporated	2718 East 24th Street  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_10-694_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Paper Service	No	OFF_SL_10-694_Official
David W.	Niles		Avant Energy Services	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Paper Service	No	OFF_SL_10-694_Official
Carol	Overland	overland@legalelectric.org	Legalelectric, Inc.	P.O. Box 176  Red Wing, MN 55066	Paper Service	No	OFF_SL_10-694_Official
Carol	Pass	cpass@runbox.com	East Phillips Improvement Coalition	2536 18th Avenue South  Minneapolis, Minnesota 55404	Electronic Service	No	OFF_SL_10-694_Official
Bob	Patton	bob.patton@state.mn.us	MN Department of Agriculture	625 Robert St N  Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_10-694_Official
Jennie	Ross	jennie.ross@state.mn.us		395 John Ireland Blvd MS 620  Saint Paul, MN 55155	Electronic Service	No	OFF_SL_10-694_Official
Howard	Roston	har@mgmlp.com	Malkerson Gunn Martin LLP	220 South Sixth Street Suite 1900 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-694_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Charles	Salter	chuck.salter@co.hennepin.mn.us	Hennepin County Attorneys Office	A-2000 Government Center 300 South Sixth Street Minneapolis, Minnesota 55487	Electronic Service	No	OFF_SL_10-694_Official
Gregory	Sautter	gregory.sautter@ci.minneapolis.mn.us	City of Minneapolis	333 South 7th Street, Suite 210 Minneapolis, MN 55403	Electronic Service	No	OFF_SL_10-694_Official
Richard	Savelkoul	rsavelkoul@felhaber.com	Felhaber, Larson, Fenlon & Vogt, P.A.	444 Cedar St Ste 2100 St. Paul, MN 55101-2136	Paper Service	No	OFF_SL_10-694_Official
Elizabeth H.	Schmiesing	eschmiesing@faegre.com	Faegre & Benson LLP	2200 Wells Fargo Center 90 S. Seventh Street Minneapolis, MN 55402	Paper Service	No	OFF_SL_10-694_Official
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	Yes	OFF_SL_10-694_Official
Tim	Springer	tim@midtowngreenway.org	Midtown Greenway Coalition	2834 10th Avenue S. Greenway Level, Suite 2 Minneapolis, MN 55407	Electronic Service	No	OFF_SL_10-694_Official
Byron E.	Starns	byron.starns@leonard.com	Leonard Street and Deinard	150 South 5th Street Suite 2300 Minneapolis, MN 55402	Paper Service	No	OFF_SL_10-694_Official
William	Storm	bill.storm@state.mn.us	Department of Commerce	Room 500 85 7th Place East St. Paul, MN 551012198	Electronic Service	Yes	OFF_SL_10-694_Official
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Paper Service	No	OFF_SL_10-694_Official
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_10-694_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jennifer	Thulien Smith	jennifer.thuliensmith@xcelenergy.com	Xcel Energy Services, Inc.	414 Nicollet Mall, 5th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_10-694_Official
Lisa	Veith		City of St. Paul	400 City Hall and Courthouse 15 West Kellogg Blvd. St. Paul, MN 55102	Paper Service	No	OFF_SL_10-694_Official
Rhyddid	Watkins	rwatkins@faegre.com	Faegre & Benson	2200 Wells Fargo Center 90 South 7th Street Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_10-694_Official