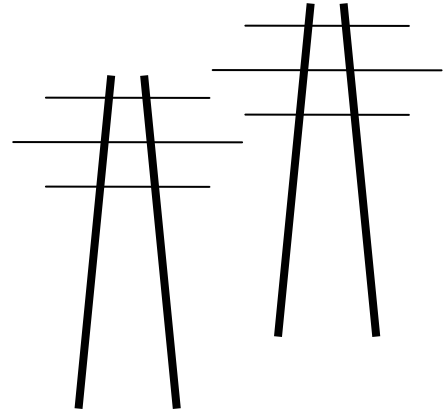


# Legalelectric, Inc.

**Carol Overland** Attorney at Law, MN #254617  
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1110 West Avenue  
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February 4, 2015

Daniel Wolf, Executive Secretary  
Minnesota Public Utilities Commission  
121 – 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

eFiled and eServed

RE: Legalelectric and Alan Muller - Petition for Intervention  
In the Matter of Xcel Energy's e21 Initiative  
PUC Docket E002/M-14-1055

Dear Mr. Wolf:

Enclosed, eFiled and eServed, please find Petition for Intervention and Notice of Appearance in the above-entitled matter.

Please let me know if you have any questions or require anything further.

Very truly yours,

Carol A. Overland  
Attorney at Law

cc: eFiled and eServed

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

Beverly Jones Heydinger  
Nancy Lange  
Dan Lipschultz  
John Tuma  
Betsy Wergin

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

**In the Matter of Xcel Energy's  
e21 Initiative**

**Docket No. E002/M-14-1055**

**PETITION FOR INTERVENTION  
LEGALECTRIC AND ALAN MULLER**

Legalelectric and Alan Muller hereby make this Petition for Intervention as full parties, with all the rights of a party, in the above captioned docket.

Legalelectric and Alan Muller request leave to intervene as provided by Minn. R. 7829.0800. Legalelectric is the business organization of Carol A. Overland, Minnesota attorney, who has represented numerous individuals and organizations before the Commission in Certificate of Need, Routing, PPA, rulemaking, PPSA Annual Hearings, and other proceedings. Alan Muller is a consultant focused on air emissions analysis and permitting, particularly for garbage and biomass burning facilities and in Commission and MPCA permitting proceedings. We have joined efforts in this intervention to pool skills, resources and time to participate in this e21 Initiative docket. The proposals of this docket require independent review and scrutiny.

From the Initial Filing entitled "Request for Planning Meeting and Dialogue in Support of e21 Initiative," and the e21 Initiative "Report that was attached, " it is apparent that some "stakeholders" are given a front row seat, some receive funding to participate, and the result is the same parties participating in agreements and policy "initiatives" over the last 20 years are

now principals in this “Initiative.” Intervention is required to secure a seat at the table, raise relevant historical and regulatory perspectives, and keep an eye on the public interest.

Under the provisions of Minn. R. 7829.0800, Legalectric and Alan Muller make this Petition to Intervene as a full party in the above-captioned proceeding. Individuals and organizations working with Legalectric and Alan Muller will be directly affected by the outcome of this e21 proceeding and regulatory changes proposed, selected and used. The interests of Legalectric and Alan Muller are distinct from other intervenors due to our exclusion from e21 discussions thus far, our freedom from funding contracts requiring advocacy of certain issues such as promotion of transmission and biomass and garbage burning, electrical industry shift from service of native load to market transactions, and regarding jurisdictional issues present in shifting toward legitimization of “regional” planning and away from state and Commission authority. Legalectric and Alan Muller wish to protect their past, present and future clients’ interests, the public interest, and develop the record in this administrative docket through our participation. There are no Intervenor or parties requesting Intervention that could or would represent the distinct interests of Legalectric and Alan Muller.

Legalectric and Alan Muller meet the criteria for intervention and respectfully request that they be granted intervention as a joint full party, with all the rights of a party, in the above-captioned proceeding.

February 4, 2015



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

**Beverly Jones Heydinger  
David C. Boyd  
Nancy Lange  
Dan Lipschultz  
Betsy Wergin**

**Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner**

Xcel Energy's e21 Initiative

PUC Docket No.: E002/M-14-1055

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**NOTICE OF APPEARANCE**

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TO THE PUBLIC UTILITIES COMMISSION:

You are advised that the party named below will appear at the above-captioned matter.

NAME OF PARTY: Legalectric and Alan Muller  
1110 West Avenue  
Red Wing, MN 55066

PARTY'S ATTORNEY and REPRESENTATIVE and for Service List:

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DATE: February 4, 2015



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