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November 8, 2013

—Via Electronic Filing—

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

RE: COMMENTS  
NOTICE –ENVIRONMENTAL AND SOCIOECONOMIC COSTS  
DOCKET NO. E999/CI-00-1636

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed Comments in response to the Minnesota Public Utilities Commission's October 14, 2013 NOTICE OF COMMENT PERIOD ON MOTION TO UPDATE ENVIRONMENTAL COST VALUES.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list. Please contact Jim Alders at [james.r.alders@xcelenergy.com](mailto:james.r.alders@xcelenergy.com) or (612) 330-6732 if you have any questions regarding this filing.

Sincerely,

/s/

CHRISTOPHER B. CLARK  
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RATES AND REGULATORY AFFAIRS

Enclosures  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
David C. Boyd	Commissioner
Nancy Lange	Commissioner
J. Dennis O'Brien	Commissioner
Betsy Wergin	Commissioner

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

DOCKET NO. E999/CI-00-1636

**COMMENTS**

**INTRODUCTION**

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission these Comments in response to the October 14, 2013 NOTICE OF COMMENT PERIOD ON MOTION TO UPDATE ENVIRONMENTAL COST VALUES in the above-referenced docket.

On October 9, 2013, the Clean Energy Organizations (Izaak Walton League of America - Midwest Office, Fresh Energy, Sierra Club, Center for Energy and Environment, Will Steger Foundation, and Minnesota Center for Environmental Advocacy) filed a motion asking the Commission to: (1) establish environmental cost values for PM<sub>2.5</sub> emissions; (2) establish environmental cost values for SO<sub>2</sub> emissions; and (3) update the current cost values for CO<sub>2</sub> and NO<sub>x</sub>. The Commission's Notice established a comment period for the following topics:

- Whether the Commission should grant the motion of Clean Energy Organizations to start a proceeding to establish and update environmental values;
- If so, whether the scope of the issues addressed in the proceeding should be as recommended by the Clean Energy Organizations;
- Whether the Commission should engage a consultant as recommended by the Clean Energy Organizations;
- Whether the Commission should refer the matter to the Office of Administrative Hearings or set some other procedure; and
- Whether the Commission should set a 12 month deadline for a decision.

The Commission established externality costs for use in resource planning proceedings in its January 1997 ORDER ESTABLISHING ENVIRONMENTAL COST VALUES in Docket No. E999/CI-93-583. In that proceeding, the Commission relied on Minnesota-specific, damage-cost based information to estimate environmental cost values. The Commission recognized that CO<sub>2</sub> should be treated differently, acknowledging its impacts should be assessed globally. The Commission has since established a process whereby its values are adjusted annually for inflation, and has established a separate proceeding as required by the Next Generation Energy Act in 2007 to estimate and regularly update a range of costs that may be imposed by carbon regulation – and require utilities to apply these estimates in resource planning proceedings (Minn. Stat. § 216H.06; Docket No. E999/CI-07-1199). We believe the Commission’s current approach in evaluating environmental costs in the resource planning process is practicable and appropriate.

A proceeding to re-examine and establish externality costs as advocated by Parties would likely be a lengthy, resource-intensive, contested case that would explore issues similar to those the Commission explored when first establishing externality costs – including the likely cost impacts of any changes on ratepayers. However, we do not believe this issue is ripe, due to air quality improvements that have been achieved under recent and significantly more stringent air quality regulations and clean energy requirements, and the evolving federal carbon regulation that is underway for both new and existing power plants. Further, there are substantial efforts underway in other proceedings to improve Minnesota’s environmental performance that resulted from the 2013 legislative session, whereby some of these issues may be otherwise examined.

Therefore, we believe the Commission should deny Parties’ motion to initiate a proceeding to establish new externality values at this time. If, however, the Commission determines some action is warranted, we recommend the Commission consider engaging a consultant to determine whether there have been any relevant advances in science since the revision of National Ambient Air Quality Standards (NAAQS) that warrant an update. We note that should the Commission determine an update to its estimated externalities is warranted, a contested case proceeding would be necessary to facilitate review and consideration of disparate evidence and views among interested parties. We believe a 12 month time frame for such a proceeding may not be sufficient, and if it is necessary to establish a timeline, 24-36 months would be more realistic.

## COMMENTS

### A. The Commission's Externalities Framework is Practicable

The Commission's current externality values were based on a damage-cost study conducted by Triangle Economic Research, LLC (TER) that was based on Minnesota-specific emissions and source-specific data such as population density, ambient air quality data, and meteorological, topographical, and agricultural information.<sup>1</sup>

The modeling in the TER study was extensive, and included baseline emissions and additional scenarios evaluating the impacts of new coal-fired plant additions or increased emissions from existing coal plants in various geographic locations. Damages were assessed at the zip code level for six pollutants, with more than 30 million ambient concentration estimates for each scenario evaluated. These estimates were then assessed for their human health impacts, agricultural effects and material damages. After considering various methods for estimating environmental values, the Commission selected this Minnesota-specific damage-cost based approach, and relied on the study to establish externality values for resource planning purposes.<sup>2</sup>

In contrast, the Parties rely heavily on a 2012 National Research Council (NRC) study by Goodkind and Polasky to support their argument that the externality values currently used by the Commission are outdated. We believe the NRC study methodology is flawed, and, as acknowledged in the study itself, it does not provide guidance on the externalities that would be imposed by emissions from a power plant in a specific location.<sup>3</sup> Therefore, the results of this study are not comparable to the Commission's Minnesota-specific externalities values, and do not provide evidence that the Commission's values should be modified.

While it would be possible to conduct an updated, Minnesota-focused damage cost study, as we have noted, before embarking on such an extensive effort, the Commission should consider engaging a consultant to assess whether there have been any relevant advances in science since the revision of NAAQS that warrant such effort.

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<sup>1</sup> *In the Matter of the Quantification of Environmental Costs Pursuant to Laws of Minnesota 1993, Chapter 356, Section 3, ORDER ESTABLISHING ENVIRONMENTAL COST VALUES*, Procedural History at 17, Docket No. E999/CI-93-583 (January 3, 1997).

<sup>2</sup> *Ibid.*

<sup>3</sup> The study relies upon values calculated at the national level by the National Research Council, with results presented for five different percentiles on a damages per ton basis, based on 2005 emissions from coal fired utility boilers. This range, as acknowledged by Goodkind and Polasky (p. 26) does not provide guidance on the externalities that would be imposed by emissions from a power plant in a specific location (e.g. in the state of Minnesota).

## B. Significant Progress in Ambient Air Quality has been Achieved

The fundamental objective of establishing externality costs and related regulations is to improve air quality. We acknowledge that the science and technical understanding of inhalation and environmental and health impacts from emissions of various pollutants have grown since the Commission first examined the cost of such externalities. However, the Commission noted in its justification for establishing the original externality values that the Environmental Protection Agency (EPA) had “not been able to keep the National Ambient Air Quality Standards updated” to reflect the latest scientific knowledge.<sup>4</sup> This is not the case today. Growing science and technical understanding *has* been applied to increasingly stringent air quality regulation, with the resulting compliance making significant reductions in emissions from utilities and improvements in Minnesota’s air quality.

The Clean Air Act requires the EPA to set the existing NAAQS for SO<sub>2</sub>, NO<sub>x</sub>, and PM<sub>2.5</sub> at a level that protects human health and the environment with an adequate margin for safety, regardless of the cost. For the first time since the early 1970s, all NAAQS have been reviewed within the last five years, in stark contrast to the status of the NAAQS when the Commission established its original externality values. In particular, the EPA has reviewed and tightened the particulate matter NAAQS three times, and the ozone NAAQS two times since 1997.

Further, as envisioned by the Commission, many of these costs have been substantially internalized as evolving and increasing air quality requirements have been imposed. We believe this internalization has led to a decline in total residual externality costs from utility sources, which recent findings of the EPA and the Minnesota Pollution Control Agency (MPCA) support.<sup>5</sup> Reductions in power sector pollutant emissions are significant enough that the MPCA noted that “[t]he majority of pollutants of most concern today come from smaller wide-spread sources that are not regulated in the way power plants and factories are.”<sup>6</sup>

The figures below show how significantly emissions from point sources in Minnesota

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<sup>4</sup> *In the Matter of the Quantification of Environmental Costs Pursuant to Laws of Minnesota 1993, Chapter 356, Section 3, ORDER ESTABLISHING ENVIRONMENTAL COST VALUES*, Page 16, Docket No. E999/CI-93-583 (January 3, 1997).

<sup>5</sup> See, for example, *EPA Regulatory Impact Analysis for the Final Revisions to the National Ambient Air Quality for Particulate Matter* at 1-4 (Dec. 2012) (PM RIA) (“Setting and implementing ...air quality standards is one way the government can address an externality and increase overall public health and welfare.”). See also MPCA, *Air Quality in Minnesota: 2013 Report to the Legislature* (January 2013) at:

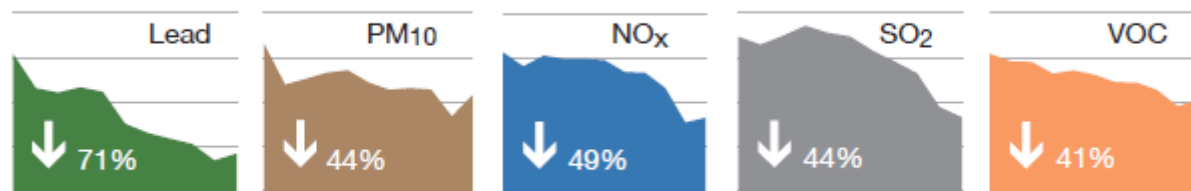
<http://www.pca.state.mn.us/index.php/view-document.html?gid=18909>

<sup>6</sup> Report at 3-4.

have declined from 2000 to 2010:

### Point Source Emission Changes (2000 to 2010)

Point source pollutants have seen significant declines (2000–2010)



For the period 2000–2010, percent decrease in total emissions for specific pollutants

Minnesota Point Source Criteria Pollutant Inventory

*Excerpt: Air Quality in Minnesota: 2013 Report to the Legislature, page 3. (January 2013)*

We note that improvements continue, including our plans to retire the coal units at Black Dog in 2015. Based on this, one would expect that total externalized damages would be lower when compared to those in the TER study, upon which the Commission based its original values.

### C. Federal Carbon Pollution Standards are Imminent

Parties advocate that the Commission adopt the federal government’s Social Cost of Carbon (SCC) as the externality value for CO<sub>2</sub> without further analysis or stakeholder consultation. In addition to other concerns, we believe accepting the SCC without engaging stakeholders in a process would be inconsistent with the Commission’s established procedure for developing a record on which to base its decisions.

We note that under Presidential Executive Order 12866, the SCC’s intended purpose is to evaluate the costs and benefits of proposed federal regulations, not provide the precise value to be used in any rulemaking.<sup>7</sup> It attempts to estimate the monetized damages associated with an incremental increase in CO<sub>2</sub> emissions over an approximately 300 year timeframe, using integrated climate assessment models and a range of discount rates to derive an estimate of the magnitude of externality values associated with CO<sub>2</sub> emissions. The authors acknowledge that this calculation is subject to significant uncertainties and must be regarded as provisional.<sup>8</sup> The SCC was never intended to be used as a resource planning tool, and is inconsistent with the Commission’s approach to externalities and their resource planning purpose.

<sup>7</sup> See <http://govinfo.library.unt.edu/npr/library/direct/orders/2646.html> at Section 1(a).

<sup>8</sup> *Technical Support Document: Social Cost of Carbon for Regulatory Impact Analysis Under Executive Order 12866*. (February 2010). See in particular pages 2, 4, 5, 8, and 17 for the author’s caveats on the uncertainty of SCC estimates.

In addition, the SCC has not been subject to a transparent stakeholder process in Minnesota, nor at the federal level. The Office of Management and Budget announced on November 1, 2013 (after Parties filed their petition advocating the use of the SCC) that it would conduct the first ever public comment period on the SCC.<sup>9</sup> It would be premature for the Commission to adopt the SCC prior to this public vetting process.

Further, pursuant to Minn. Stat. §116H.06, the Commission has established a process based on a risk of regulation model that annually updates the estimated future costs that a utility might incur from CO<sub>2</sub> regulation.<sup>10</sup> We are in that annual process now, with Comments due to the Commission on November 18, 2013 in Docket No. E999/CI-07-1199.

We believe it is important to also note that that CO<sub>2</sub> and other greenhouse gases (GHGs) are now subject to existing regulations, with further regulations to be established on a clearly defined near-term timeframe. For example, the EPA on September 20, 2013 published a proposed GHG performance standard for new power plants, and is expected to issue a proposed rule establishing carbon pollution standards for existing power plants by June 1, 2014, with a final rule issued by June 2015.

As with the criteria pollutants, we believe the EPA's promulgation of new carbon pollution control regulations will internalize many environmental costs of CO<sub>2</sub> emissions, and will incorporate the increased science regarding the environmental impacts of climate change since the Commission first established externality values. In the interim, while federal rules are pending, the Commission has its carbon proxy mechanism under Minn. Stat. § 216H.06 that uses an annual stakeholder process to estimate a wide range of potential costs related to the future risk of regulation. The Commission should continue to rely on this process for the relatively short timeframe until actual CO<sub>2</sub> regulations are in place.

#### **D. Recommendations**

1. *Should the Commission grant the motion of Clean Energy Organizations to start a proceeding to establish and update environmental values?*

No. As we have discussed, we believe the Commission should deny Parties' motion

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<sup>9</sup> *Refining Estimates of the Social Cost of Carbon*. Howard Shelanski, Administrator of OIRA. See also E&E News PM, November 4, 2013, *Carbon estimate to receive public comment*.

<sup>10</sup> In the original externality proceeding, the Commission recognized that a cost of control method may be reasonable in certain circumstances (at p. 14), and noted when setting the carbon proxy costs that both methods "attempt to account for the burdens that CO<sub>2</sub> emissions impose on third parties (proxy order at 4).

to initiate a proceeding to establish new externality values. We believe the Commission's method of addressing externalities and risk of regulation in the resource planning process is practicable and reasonable. A proceeding to re-examine and establish externality costs as advocated by Parties would be a lengthy, resource-intensive, contested case that would explore issues similar to those the Commission explored when establishing its externality costs.

As well, we do not believe this issue is ripe, due to air quality improvements that have been achieved under recent and significantly more stringent air quality regulations and clean energy requirements, and evolving federal carbon regulation. Further, there are substantial efforts underway in other proceedings to improve Minnesota's environmental performance that resulted from the 2013 legislative session, whereby some of these issues may be otherwise examined.

*2. If so, should the scope of the issues addressed in the proceeding be as recommended by the Clean Energy Organizations?*

No. As indicated above, we believe the Commission should deny Parties' motion. Further, as we have discussed, the SCC is not intended to be used for resource planning, and adopting a standard without a stakeholder process would be inconsistent with the Commission's established procedure for developing a record on which to base its decisions. In addition, we believe adoption is unnecessary since the Commission has an established process to consider the anticipated costs of regulation in resource planning, and in any case, would be premature, since the SCC is highly uncertain, provisional and only on November 1, 2013, the federal government announced it would accept public comment on the SCC for the first time.

*3. Should the Commission engage a consultant as recommended by the Clean Energy Organizations?*

No. However, if the Commission believes some action at this time is necessary, it should consider engaging a Consultant to examine available damage-cost literature to determine whether there is sufficient Minnesota-specific, damage-cost based information that has not already been taken into consideration in regulation to warrant a change to the Commission's current non-carbon externality costs.

*4. Should the Commission refer the matter to the Office of Administrative Hearings or set some other procedure?*

We believe the Commission should deny Parties' motion. However, should the Commission determine otherwise, a contested case proceeding would be necessary to facilitate a robust stakeholder process that would likely involve much evidence, expert



opinions, and differing perspectives.

5. *Should the Commission set a 12 month deadline for a decision?*

No. A 12-month timeline may not be sufficient, and such a deadline should not be established at the outset. We believe the Commission process should thoroughly consider all stakeholder perspectives. The process of analyzing and adopting updated externality values would require completion of appropriate studies and is likely to be highly contentious. With expert consultants and witnesses on all sides, such a proceeding could take significantly more than 12 months. The initial proceeding to establish externality values was the result of a contested case proceeding that lasted over two years. We would expect the process here to be at least as long.

### CONCLUSION

Xcel Energy appreciates the opportunity to provide these Comments. We believe the Commission's current framework to assess externalities in the resource planning process is practicable and continues to be supported by science, and that this issue is not ripe for consideration at this time. Therefore, we believe the Commission should:

- Deny Parties' motion to initiate a proceeding to establish new externality values; and
- Decline to adopt the SCC as advocated by Parties.

If, however, the Commission determines some action at this time is warranted, we recommend the Commission consider engaging a consultant to determine whether there is sufficient Minnesota-specific, damage-cost based information to warrant a change to the Commission's current non-carbon externality.

Dated: November 8, 2013

Northern States Power Company

Respectfully submitted by:

/s/

CHRISTOPHER B. CLARK  
REGIONAL VICE PRESIDENT  
RATES AND REGULATORY AFFAIRS

## CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies of the foregoing document or a summary thereof on the attached lists of persons:

xx by depositing a true and correct copy or summary thereof, properly enveloped with postage paid, in the United States Mail at Minneapolis, Minnesota; or

xx via electronic filing

**MPUC DOCKET NO. E999/CI-00-1636**

Dated this 8<sup>th</sup> day of November 2013

/s/

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SaGonna Thompson

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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	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
Lori	Frisk Thompson	lorift@cmmpa.org	Central MN MPA	459 S Grove St  Blue Earth, MN 56013	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Gary	Garbe	Gary.Garbe@avantenergy.com	Minnesota Municipal Power Agency	200 South Sixth Street Suite 300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	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
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
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
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
David P.	Geschwind	dp.geschwind@smmpa.org	Southern Minnesota Municipal Power Agency	500 First Avenue SW  Rochester, MN 55902	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
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 Fourth Ave. S., Ste 700  Minneapolis, MN 55415-1842	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
Bill	Heaney	billheaney@billheaney.com	IBEW Minnesota State Council	3931 Silver Lake Rd NE  St. Anthony Village, MN 55421	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties

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John	Helmets	helmets.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
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	SPL_SL_0-1636_2_Interested Parties
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
Ashley	Houston			120 Fairway Rd Chestnut Hill, MA 24671850	Paper Service	No	SPL_SL_0-1636_2_Interested Parties
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	SPL_SL_0-1636_2_Interested Parties
Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue Bismarck, ND 58501	Electronic Service	No	SPL_SL_0-1636_2_Interested Parties
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 N.	Johnson	PaulaJohnson@alliantenergy.com	Interstate Power and Light Company	200 First Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_0-1636_2_Interested Parties
Larry	Johnston	lw.johnston@smmpa.org	SMMPA	500 1st Ave SW Rochester, MN 55902-3303	Paper Service	No	SPL_SL_0-1636_2_Interested Parties
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248 Madison, SD 57042	Electronic 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
Nancy	Kelly	bademailnancyk@eurekarecycling.org	Eureka Recycling	2828 Kennedy Street NE  Minneapolis, MN 55413	Paper Service	No	SPL_SL_0-1636_2_Interested Parties
Neil	Kennebeck		Dairyland Power Cooperative	PO Box 817 3200 East Avenue South LaCrosse, WI 546020817	Paper Service	No	SPL_SL_0-1636_2_Interested Parties
Julie	Ketchum	N/A	Waste Management	20520 Keokuk Ave  Lakeville, MN 55044	Paper Service	No	SPL_SL_0-1636_2_Interested Parties
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
Mark R.	Leaman	N/A	Calpine Corporation	717 Texas St, Ste 1000  Houston, TX 77002-2743	Paper Service	No	SPL_SL_0-1636_2_Interested Parties
Valerie Matthews	Lemieux	cllemieux@lemieuxlaw.com	Valerie Matthews Lemieux Law Corporation	102-500 Tache Avenue  Winnipeg, MB R2H 0A2  CANADA	Paper Service	No	SPL_SL_0-1636_2_Interested Parties
Deborah Fohr	Levchak	dlevchak@bepc.com	Basin Electric Power Cooperative	1717 East Interstate Avenue  Bismarck, ND 585030564	Paper Service	No	SPL_SL_0-1636_2_Interested Parties
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	Yes	SPL_SL_0-1636_2_Interested Parties
Mark	Lindquist	N/A	The Minnesota Project	57107 422nd St  New Ulm, MN 56073-4321	Paper Service	No	SPL_SL_0-1636_2_Interested Parties

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Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
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Douglas J.	Mackenzie	dmackenzie@campbellmar r.com	Campbell, Marr, LLP	10 Donald Street  Winnipeg, MB R3L 1Y5  CANADA	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
Mike	McDowell		Heartland Consumers Power District	PO Box 248  Madison, SD 570420248	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
Dave	McNary	N/A	Hennepin County DES	701 Fourth Avenue South suite 700 Minneapolis, MN 55415-1842	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
John	McWilliams	jmm@dairynet.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817  La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Valerie	Means	valerie.means@lawmoss.c om	Moss & Barnett	Suite 4800 90 South Seventh Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Stacy	Miller	stacy.miller@state.mn.us	Department of Commerce	State Energy Office 85 7th Place East, Suite 500 St. Paul, MN 55101	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
Peter J.	Nelson	peter.nelson@americanexperiment.org	Center of the American Experiment	Suite 1024 12 South Sixth Street Minneapolis, MN 55402	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
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Helen	Proechel			224 North Fairview  St. Paul, MN 55104	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
Kent	Ragsdale	kentragdale@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
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 55369	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties

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John C.	Reinhardt		Laura A. Reinhardt	3552 26Th Avenue South  Minneapolis, MN 55406	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
Trudy	Richter	trichter@rranow.com	Minnesota Resource Recovery Assn.	477 Selby Avenue  St. Paul, MN 55102	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
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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
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129  St. Paul, MN 55116	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
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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Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
David B.	Sogard	dsogard@minnkota.com	Minnkota Power Cooperative, Inc.	PO Box 13200 1822 Mill Road Grand Forks, ND 582083200	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201  St. Paul, MN 55104	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Wayne	Stenehjerm		Office Of Attorney General	Dept. 125 600 E. Boulevard Avenue Bismarck, ND 585050040	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
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Steve	Thompson		Central Minnesota Municipal Power Agency	459 S Grove St  Blue Earth, MN 56013-2629	Paper Service	No	SPL_SL_0- 1636_2_Interested Parties
David	Thornton	J.David.Thornton@state.mn.us	MN Pollution Control Agency	520 Lafayette Road  St. Paul, MN 55101	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	Suite 325 7301 Ohms Lane Edina, MN 55439	Electronic Service	No	SPL_SL_0- 1636_2_Interested Parties
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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Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800  Owatonna, MN 55060	Electronic Service	No	SPL_SL_0-1636_2_Interested Parties
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		WHEELER, VAN SICKLE & ANDERSON	Suite 801 25 West Main Street Madison, WI 537033398	Paper Service	No	SPL_SL_0-1636_2_Interested Parties