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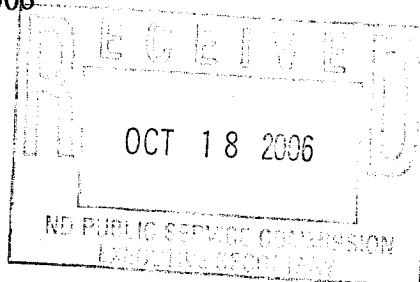
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October 18, 2006

ILLONA JEFFCOAT-SACCO
ND PUBLIC SERVICE COMMISSION
600 E BOULEVARD AVE
BISMARCK ND 58505-0480



RE: Case No. PU-06-290
NDPSC
Federal Energy Policy Act Standards Investigation
Petition to Intervene and Filing of Written Comments by Imation Corp.

Dear Ms. Jeffcoat-Sacco:

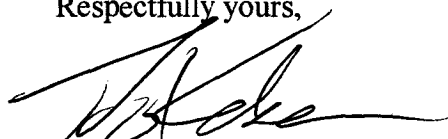
I am enclosing an original and seven copies of the Petition to Intervene in the above case no. PU-06-290 on behalf of Imation Corp.

I am also filing written comments from Steve Otto and Gary Mol with Imation Corp. prepared with the assistance of Larry Schedin PE, LLS Resources and Kavita Maini, KM Energy Consulting, LLC.

I have also forwarded the Petition to Intervene and Comments to you by email and copied Jerry Lien and Bill Binek.

If you have any questions, please give me a call.

Respectfully yours,


Thomas D. Kelsch

TDK:dr
Enclosures
cc: Imation Corp.



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Pages: 1

Cover letter re Petition to Intervene and
Comments
by Imation Corp. by Thomas D. Kelsch, Attorney
10/18/2006 C: Comm Legal Illona, Jerry, Annette