



414 Nicollet Mall
Minneapolis, Minnesota 55401

— VIA ELECTRONIC FILING —

December 29, 2011

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

RE: PETITION UPDATE
2012-2014 TRIENNIAL NUCLEAR PLANT DECOMMISSIONING ACCRUAL
DOCKET NO. E002/M-11-939

Dear Dr. Haar:

On November 30, 2011, Northern States Power Company submitted a Petition for approval of our *2012-2014 Triennial Nuclear Decommissioning Accrual* and supporting materials. We provide this updated filing to address the property tax and 36-year detailed cost scenario issues discussed in our initial Petition. We are pleased to report that the 36-year detailed analysis reduces the annual accrual by approximately \$2 million.¹ As such, we are modifying our Petition to seek approval of the revised studies and request an annual accrual of \$11,180,757 be set beginning 2013. We continue to recommend that DOE Settlement funds be used to minimize the impact on customers.

SUMMARY OF UPDATED ANALYSIS

As anticipated, the updated analysis indicates that the property tax adjustment results in an increase of just over \$800,000 per year in the annual accrual for each of the 60-year, 100-year, and 200-year scenarios. The complete 36-year scenario developed with the same bottom-up rigor as the other scenarios shows a \$2 million reduction in the annual accrual compared to the preliminary analysis. Annual accrual comparisons of the initial and updated 2013 accrual analyses are shown below.

¹ Includes property tax and earnings rate updates.

2013 Accrual Comparison

2013 Accrual	Initial Filing	Updated Filing	Difference
36-Year	\$13,563,239	\$11,180,757	(\$2,382,482)
60-Year	\$13,354,861	\$14,189,132	\$834,271
100-Year	\$15,476,189	\$16,337,631	\$861,442
200-Year w/o repackaging	\$16,745,864	\$17,597,410	\$851,546
200-Year w/ repackaging	\$19,143,066	\$19,966,865	\$823,799

The significant decrease in the updated 36-year accrual is primarily due to the timing of the shipping of the casks at Prairie Island and associated efficiencies that are gained as a result. The 36-year scenario assumes that the DOE begins accepting spent nuclear fuel nine years before plant shutdown and that Prairie Island begins shipping seven years prior to shutdown. As a result, those shipping costs are included in plant operations instead of paid for entirely from the decommissioning fund. Whereas with all other scenarios, all shipping costs are paid from the decommissioning fund since the plant is no longer operating at the time shipping begins. Additionally, when a plant ceases operation, 100 percent of some otherwise shared labor costs, such as security, are paid entirely from the decommissioning fund. When casks are shipped during plant operations however, these costs are paid as part of plant operating expenses, resulting in less labor costs being needed during the decommissioning years.

UPDATED REQUEST

Based on the updated analysis, we continue to support a 2013 accrual based on the 36-year period to remove all spent fuel from the Monticello and Prairie Island plants after shutdown. The Company requests that the Commission approve the updated studies, and that the 2013 accrual be set at \$11,180,757. The Company also continues to support the application of a portion of the future DOE Settlement dollars to fund the accrual - eliminating the need to begin charging customers to fund the deficit - and crediting the remaining settlement dollars to customers. This option also preserves the possibility that use of DOE Settlement

dollars beyond the current DOE Settlement could be used to reduce or offset future accruals if these funds become available. This issue would be further revisited in our 2014 Triennial Nuclear Decommissioning filing.

MATERIALS UPDATED

For ease in reviewing, the Company is providing the Petition Update - both in redlined and clean format - reflecting the changes discussed above. Below is a list of new Schedules attached to this update. All new schedules listed below replace the previous schedules in their entirety. All other schedules remain as originally filed.

- i) Schedule A: Cost Estimate Scenarios
- ii) Schedule G: Theoretical Fund Balance
- iii) Schedule H: Decommissioning Accrual Recommendations
- iv) Schedule I: Rate Impact Calculation
- v) Schedule M: Monticello Decommissioning Cost Analysis Study
- vi) Schedule N: Prairie Island Decommissioning Cost Analysis Study

Pursuant to Minn. Stat. § 216.17, subd.3, we have electronically filed this Petition Update and supporting materials to the Commission and the Minnesota Department of Commerce, Division of Energy Resources. Two copies have also been provided to the Office of the Attorney General – Residential Utilities Division. Copies have also been provided to the nuclear plant host cities and counties, the Cities of Red Wing and Monticello, legislators representing the host cities, and the Prairie Island Indian Community. In addition, a one-page Summary Update of the filing - both in redlined and clean format - has been provided to persons on the official service list for this filing and our 2008 Triennial Decommissioning Accrual filing (Docket No. E002/M-08-1201) and a number of related nuclear dockets identified in our Certificate of Service. The one-page Summary Update contains directions on how to access an updated electronic copy on Xcel Energy's website.

Burl W. Haar
December 29, 2011
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Please contact Al Krug, Managing Director, Regulatory Affairs, at 612-330-6270, or allen.krug@xcelenergy.com if there are any questions regarding this filing.

Sincerely,

/s/

JEFFREY S. SAVAGE
VICE PRESIDENT AND CONTROLLER

Enclosures

cc: Service Lists
Interested Parties List

CERTIFICATE OF SERVICE

I, Lindsey L. Didion, 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

DOCKET Nos.: **DOCKET No. E002/CN-05-123**
 DOCKET No. E002/CN-08-185
 DOCKET No. E002/CN-08-509
 DOCKET No. E002/CN-08-510
 DOCKET No. E002/M-08-1201
 DOCKET No. E002/CN-09-36
 DOCKET No. E002/RP-10-825
 DOCKET No. E002/GR-10-971
 DOCKET No. E002/M-11-939
 DOCKET No. E002/M-11-1184
 XCEL ENERGY'S MISCELLANEOUS ELECTRIC
 INTERESTED PARTIES LIST – MONTICELLO
 INTERESTED PARTIES LIST – PRAIRIE ISLAND

Dated this 29th day of December, 2011

/s/

Lindsey L. Didion

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Mark	Lindquist		The Minnesota Project	1026 North Washington Street New Ulm, MN 56073	Paper Service	No	OFF_SL_10-825_RP-10-825
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Paper Service	No	OFF_SL_10-825_RP-10-825
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4 Canada	Paper Service	No	OFF_SL_10-825_RP-10-825

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Meloy	brian.meloy@leonard.com	Leonard, Street & Deinard	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-825_RP-10-825
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_10-825_RP-10-825
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_10-825_RP-10-825
Thomas L.	Osteraas	tomosteraas@excelsiorenergy.com	Excelsior Energy	225 S 6th St Ste 1730 Minneapolis, MN 55402	Paper Service	No	OFF_SL_10-825_RP-10-825
Joshua	Pearson	N/A	enXco, Inc.	15445 Innovation Drive San Diego, CA 92128	Paper Service	No	OFF_SL_10-825_RP-10-825
Kent	Ragsdale	kentragdsdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Paper Service	No	OFF_SL_10-825_RP-10-825
Kevin	Reuther		MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Paper Service	No	OFF_SL_10-825_RP-10-825
Matthew J.	Schuerger P.E.		Energy Systems Consulting Services, LLC	P.O. Box 16129 St. Paul, MN 55116	Paper Service	No	OFF_SL_10-825_RP-10-825
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	15347 Boulder Pointe Road Eden Prairie, MN 55347	Paper Service	No	OFF_SL_10-825_RP-10-825
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_10-825_RP-10-825

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_10-825_RP-10-825
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_10-825_RP-10-825
Douglas	Tiffany	tiffa002@umn.edu	University of Minnesota	316d Ruttan Hall 1994 Buford Avenue St. Paul, MN 55108	Paper Service	No	OFF_SL_10-825_RP-10-825

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_10-971_CC-SL -- Rate Case
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_10-971_CC-SL -- Rate Case
Christopher	Clark	christopher.b.clark@xcelenergy.com	Xcel Energy	5th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_10-971_CC-SL -- Rate Case
James R	Denniston	james.r.denniston@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_10-971_CC-SL -- Rate Case
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_10-971_CC-SL -- Rate Case
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	Yes	OFF_SL_10-971_CC-SL -- Rate Case
Ronald	Giteck	ron.giteck@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_10-971_CC-SL -- Rate Case
Janet	Gonzalez	Janet.gonzalez@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_10-971_CC-SL -- Rate Case
Lloyd	Grooms	lgrooms@winthrop.com	Winthrop and Weinstine	Suite 3500 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_10-971_CC-SL -- Rate Case
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_10-971_CC-SL -- Rate Case

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Beverly	Heydinger	beverly.heydinger@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Paper Service	Yes	OFF_SL_10-971_CC-SL -- Rate Case
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_10-971_CC-SL -- Rate Case
Linda S.	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1400 BRM Tower 445 Minnesota Street St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_10-971_CC-SL -- Rate Case
Richard	Johnson	johnsonr@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Center 90 South Seventh Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-971_CC-SL -- Rate Case
James	Johnson	james.p.johnson@xcelenergy.com	Xcel Energy Services Inc.	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_10-971_CC-SL -- Rate Case
Mara	Koeller	mara.n.koeller@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_10-971_CC-SL -- Rate Case
Robert S	Lee	RSL@MCMLAW.COM	Mackall Crouse & Moore Law Offices	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 554022859	Electronic Service	No	OFF_SL_10-971_CC-SL -- Rate Case
Matthew P	Loftus	matthew.p.loftus@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_10-971_CC-SL -- Rate Case
Paula	Maccabee	Pmaccabee@visi.com	Just Change Law Offices	1961 Selby Avenue St. Paul, MN 55104	Electronic Service	No	OFF_SL_10-971_CC-SL -- Rate Case

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_10-971_CC-SL -- Rate Case
Andrew	Moratzka	apm@mcmlaw.com	Mackall, Crouse and Moore	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-971_CC-SL -- Rate Case
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Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	Yes	OFF_SL_10-971_CC-SL -- Rate Case
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Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_11-939_11-939
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	900 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_11-939_11-939
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Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	OFF_SL_11-1184_M-11-1184
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Michael	Bradley	bradley@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	OFF_SL_11-1184_M-11-1184
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B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP	Suite 1500 50 South Sixth Street Minneapolis, MN 554021498	Paper Service	No	OFF_SL_11-1184_M-11-1184
David M	Brown	N/A		Capitol Bldg Rm 205 75 Dr Martin Luther King Jr Blvd Saint Paul, MN 5155-1606	Paper Service	No	OFF_SL_11-1184_M-11-1184
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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George	Crocker	gwllc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Paper Service	No	OFF_SL_11-1184_M-11-1184
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Kristen	Eide Tollefson	ket@wro-ns.net	R-CURE	P O Box 129 Frontenac, MN 55026	Paper Service	No	OFF_SL_11-1184_M-11-1184
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_11-1184_M-11-1184
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Dave	Graning	N/A		PO Box 250 Becker, MN 55308	Paper Service	No	OFF_SL_11-1184_M-11-1184
Christopher	Greenman	ChristopherGreenman@excelsiorenergy.com	Excelsior Energy	225 S 6th St Ste 1730 Minneapolis, MN 55402-4638	Paper Service	No	OFF_SL_11-1184_M-11-1184
Lloyd	Grooms	lgrooms@winthrop.com	Winthrop and Weinstine	Suite 3500 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_11-1184_M-11-1184
Todd J.	Guerrero	tguerrero@fredlaw.com	Fredrikson & Byron, P.A.	Suite 4000 200 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_11-1184_M-11-1184
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_11-1184_M-11-1184

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Thomas P.	Harlan	harlan@mdh-law.com	Madigan, Dahl & Harlan, P.A.	222 South Ninth Street Suite 3150 Minneapolis, MN 55402	Paper Service	No	OFF_SL_11-1184_M-11-1184
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Beverly	Heydinger	beverly.heydinger@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Paper Service	Yes	OFF_SL_11-1184_M-11-1184
John	Howe	N/A		2603 Pine Ridge Blvd Red Wing, MN 55066	Paper Service	No	OFF_SL_11-1184_M-11-1184
Arshia	Javaherian	arshiajavaherian@alliantenergy.com	Interstate Power and Light.	PO Box 351 Cedar Rapids, IA 524060351	Paper Service	No	OFF_SL_11-1184_M-11-1184
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Richard	Johnson	johnsonr@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Center 90 South Seventh Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_11-1184_M-11-1184

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Tim	Kelly	rep.tim.kelly@house.mn		565 State Office Building 100 Rev. Dr. Martin Luther King Jr. Blvd. Saint Paul, MN 55155-1298	Electronic Service	No	OFF_SL_11-1184_M-11-1184
Mary	Kiffmeyer	N/A		501 State Office Building 100 Rev Dr Martin Luther King Jr Blvd Saint Paul, MN 55155	Paper Service	No	OFF_SL_11-1184_M-11-1184
Amy	Koch	N/A		State Office Bldg Rm 208 75 Dr Martin Luther King Jr Blvd Saint Paul, MN 55155-1606	Paper Service	No	OFF_SL_11-1184_M-11-1184
Hank	Koegel	N/A	enXco	10 Second St., NE, Ste 107 Minneapolis, MN 55413	Paper Service	No	OFF_SL_11-1184_M-11-1184
Thomas G.	Koehler	N/A	Local Union #160, IBEW	2909 Anthony Ln Minneapolis, MN 55418-3238	Paper Service	No	OFF_SL_11-1184_M-11-1184
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Nancy	Lange	nlange@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Paper Service	No	OFF_SL_11-1184_M-11-1184
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_11-1184_M-11-1184
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_11-1184_M-11-1184
Michael	Lewis	michael.lewis@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_11-1184_M-11-1184
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	900 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_11-1184_M-11-1184
Mark	Lindquist		The Minnesota Project	1026 North Washington Street New Ulm, MN 56073	Paper Service	No	OFF_SL_11-1184_M-11-1184
Matthew P	Loftus	matthew.p.loftus@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_11-1184_M-11-1184
Richard	Luis	Richard.Luis@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Paper Service	No	OFF_SL_11-1184_M-11-1184

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Phil	Mahowald	pmahowald@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Road Welch, MN 55089	Paper Service	No	OFF_SL_11-1184_M-11-1184
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Paper Service	No	OFF_SL_11-1184_M-11-1184
Mary	Martinka	mary.a.martinka@xcelenergy.com	Xcel Energy Inc	414 Nicollet Mall Minneapolis, MN 55401	Electronic Service	No	OFF_SL_11-1184_M-11-1184
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4 Canada	Paper Service	No	OFF_SL_11-1184_M-11-1184
Joe	McDonald	N/A		523 State Office Bldg 100 Rev Dr Martin Luther King Jr Blvd Saint Paul, MN 55155	Paper Service	No	OFF_SL_11-1184_M-11-1184
Brian	Meloy	brian.meloy@leonard.com	Leonard, Street & Deinard	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_11-1184_M-11-1184
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_11-1184_M-11-1184
Andrew	Moratzka	apm@mcmlaw.com	Mackall, Crouse and Moore	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 55402	Paper Service	No	OFF_SL_11-1184_M-11-1184

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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**E002/M-11-939
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