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April 17, 2009

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—VIA ELECTRONIC FILING—

Burl W. Haar
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Minnesota Public Utilities Commission
121 7th Place East, Suite 350
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PUBLIC SERVICE COMMISSION

RE: REPLY COMMENTS
INACCURATE GAS METERS, RECALCULATION OF BILLS, AND RELATED ISSUES
and SERVICE RULES TARIFF MODIFICATION
DOCKET NOS. G-002/CI-08-871, E,G-002/M-09-224

Dear Dr. Haar:

Northern States Power Company, a Minnesota corporation ("Xcel Energy" or the "Company") submits this Reply to Comments from the Minnesota Office of Energy Security ("OES"), the Minnesota Office of Attorney General ("OAG"), and the Suburban Rate Authority ("SRA") dated April 3, 2009 in the above-referenced Dockets.

We have served a copy on the Attorney General's Office- Residential Utilities Division and all parties on the attached service lists.

Please contact me at (612) 330-6064 if you require any additional information.

Sincerely,

/s/

BRIA SHEA
CASE SPECIALIST

Enclosures

c: Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

David Boyd	Chair
J. Dennis O'Brien	Commissioner
Thomas Pugh	Commissioner
Phyllis Reha	Commissioner
Betsy Wergin	Commissioner

IN THE MATTER OF AN INVESTIGATION
INTO NORTHERN STATES POWER
COMPANY, A MINNESOTA CORPORATION,
INACCURATE GAS METERS,
RECALCULATION OF BILLS, AND RELATED
ISSUES

DOCKET NO. G-002/CI-08-871

SERVICE RULES TARIFF MODIFICATION

DOCKET NO. E,G-002/M-09-224

REPLY COMMENTS

INTRODUCTION

Northern States Power Company, a Minnesota corporation ("Xcel Energy" or the "Company") submits to the Minnesota Public Utilities Commission (the "Commission") this Reply to Comments from the Minnesota Office of Energy Security ("OES"), the Minnesota Office of Attorney General – Residential Utilities Division ("OAG"), and the Suburban Rate Authority ("SRA") dated April 3, 2009 in the above-referenced Dockets.

REPLY

We appreciate the Comments from the OES, OAG, and SRA, and provide below our Reply Comments to the specific areas addressed in these Comments.

A. Comments from the Minnesota Office of Energy Security

We appreciate the OES' support for our proposed resolution and rebilling plan, with modifications. We acknowledge the OES' concerns regarding the Company's inconsistent follow-through on previous commitments in this proceeding, and appreciate the OES' positive acknowledgement of actions we have taken to improve our processes going forward.

We look forward to continuing to demonstrate our commitment to customer service and process improvement by providing relevant updates to the OES, Commission Staff, and the OAG, as well as through our participation in establishing appropriate service quality measures at the conclusion of the GEM review.

We provide below the additional information and clarifications requested.

1. *Rebilling Plan*

a. Customer-Specific Rebilling Period

The OES asked the Company to clarify how it will determine the rebilling period contained in our proposal.¹ We apologize for any confusion that our description may have caused as to our intent. It is not our intention to establish an arbitrary date from which we would assume a one-year period to rebill all affected customers. Rather, our proposal is to analyze each customer's account to determine each customer's module failure date and module replacement date. We will use these dates to determine each customer's rebilling period, but will limit the period to a *maximum* of one year from the date the defective module was replaced.

b. Customers Who Reported a Problem

We agree with the OES recommendation and clarify that our proposed approach for customers who called us to report a problem is to only rebill them for their usage from the *date of the module malfunction* to the *date the customer contacted us*, if it took us more than ten days to initiate an investigation. We note that we believe that neither Minn. R. 7820.4000 nor Minn. R. 7820.3900 require that we *conclude* the investigation or *resolve* the issue within that same period. So, in addition to providing for billing

¹ In its comments, the OES expressed concern that the Company, as part of the Amended Petition and Proposed Resolution, has proposed to automatically assume a one-year period for all rebills.

from the *date of the module malfunction* to the *date the customer contacted us*, the rules provide for billing from the *date of the investigation* to the *date the issue is resolved*, which is the reason for our proposed tariff language.

We note that, in most cases, we are able to complete the repair/resolve the issue at the time we perform an investigation of the reported issue. But, there are times when we are not able to fully resolve the issue at the time of our investigation. For example, natural gas meter replacements must be coordinated with a customer; as they require that we shut-off the customer's gas, relight pilot lights, and perform a series of safety checks, which cannot be done in the customer's absence. We may not be able to complete this coordination with a customer in the same time period.

c. Customer Communications

We have made the recommended update to the proposed letter for the customers who have already been rebilled and who have an outstanding balance. Also as recommended, we will work with the Commission's Consumer Affairs Office ("CAO") on further enhancements to our customer rebilling communications.

2. *Financial Remedies and Reporting*

a. Service Quality Credits

We have proposed to provide a \$50 service quality credit to all customers already rebilled, and those customers pending rebilling and currently in the hold queue, should they require rebilling. We are estimating that approximately 10,400 customers will receive service quality credits as part of this proposal, which includes the approximately 1,360 customers already rebilled. We note that we do not expect to rebill *all* customers currently in the rebilling hold queue, thus only those requiring rebilling will receive the \$50 credit.²

We also clarify that any customers affected by the "five-dial meter issue" are in a separate hold queue, so would not automatically be included in the rebilling plan or resolution we have proposed in this proceeding, should the Commission approve our proposal. While we continue to anticipate that this issue may also require a resolution such as proposed in this Docket, we would make that specific proposal separate from this proceeding.

² The analysis we undertake as part of the rebilling process may determine that no billing error actually occurred. In these instances, the customer will not require rebilling, and will not receive a service quality credit.

b. Rebilling Reporting – Module Type

The OES requests we identify the cause for rebilling each customer in our final reporting. We can identify whether the rebilling occurred as a result of a meter or module failure. However, we are only able to track the *current* module-type that is installed on each meter, and cannot identify the specific type of module that was previously installed on the customer's meter. This means that we do not have detailed records from which to report the type of module that a customer had at the time that it failed.

While we don't have the module-type history details, we can determine the *likely* module-type based on the type of meter/customer and the module installation date. In any final report in this proceeding, we will approximate the likely module-type for any customers rebilled under the proposed rebilling plan.

We note that we had previously identified our lack of module-type history for specific premises as a gap in our process with Cellnet, and have since developed enhancements to our systems that will track the module-type history. We expect to implement these enhancements by the end of 2nd quarter 2009 so that we are able to track the information going forward.

c. Unbillable Gas

The OES is correct in their assumption that after all affected customers are rebilled, we will apply the unbillable weather percentage to actual billed sales rather than a combination of actual and estimated sales.

The OES suggests we use an average-per-customer consumption amount as a proxy for the unbillable natural gas adjustment for customers that do not have sufficient billing history for a rebill (which would include new construction), and for those customers who have moved. We agree with the OES-proposed methodology for the customers with insufficient billing history. However, we clarify that we intend to use customers' actual usage history to estimate the usage for customers who have moved; we think this approach will more accurately represent their estimated usage for the true-up adjustment. But, in cases where customers who have moved do not have sufficient historical usage, we will apply the average-use-per-customer proxy, as recommended by the OES.

Additionally, we note that our unbillable natural gas calculations already include an adjustment for the natural gas costs associated with any customers who called to

report a potential meter problem, and our response to their inquiry exceeded ten-days – as outlined in Section 1(a), above.

d. Recovery of Related Costs

We confirm that our commitment to waive the recovery of costs we have incurred as a result of the 1074 v.2 module failure is not limited to those costs incurred to-date. For example, the \$944,000 cost of our proposed resolution in this docket is an estimate; our final costs related to the adjustments to the natural gas true-up and payment of the service quality credits will not be known until our proposed rebilling of affected customers is complete.

Costs we have incurred to-date are Operating and Maintenance (“O&M”), largely for administrative, customer service, and/or investigative costs associated with the module failure. While we did not begin tracking these costs immediately upon identifying the module failure issue, we have been estimating them since August 2008. We are also monitoring incremental costs that we may continue to incur, such as the cost of the GEM review.

If the Commission permits the Company to proceed with our proposed rebilling plan, we can provide a summary of our costs in a supplemental filing after rebilling.

B. Comments of the Minnesota Office of the Attorney General

We appreciate the OAG’s Comments and consideration of our proposed Rebilling Plan. We agree with the principles that the OAG outlines as an appropriate resolution to this matter, and believe our proposed resolution addresses each of them.³ We provide clarification and/or our response to specific issues, below:

1. *Product Information Letter*

The OAG Comments state that Xcel Energy took no action in response to the August 2007 Product Information Letter (“PIL”). We clarify that the PIL described a potentially problematic situation with the 1074 v.2 model module that Cellnet believed existed, and their speculation on what might be the cause (*i.e.*, water entering the module, freezing and locking the dial dog in place). It then outlined four actions that *Cellnet* was taking to modify their installation procedures and product, and provided their target date (November 2007) for providing a new product. It was

³ OAG Comments at 3-4.

Cellnet's obligation under the contract to fix their product if it had problems and, based on the PIL, we understood and expected that they would do so if they confirmed that the 1074 v.2 modules did indeed have a problem.

In hindsight, our receipt of the PIL may have warranted more action by the Company. As a utility, we deal with a lot of equipment. To the extent there is a problem with equipment identified by the equipment vendor, such as in this case with Cellnet, we expect that the vendor will remedy the problem per its warranty obligations or, if necessary, will expressly request action or assistance by the Company. The PIL was not a notice requesting action or assistance from the Company; rather it outlined actions Cellnet was taking in response to an issue that they believed existed. Since this time, we have implemented more extensive testing procedures as it relates to Cellnet module product changes, and our receipt of information such as this in the future would be treated in an escalated manner.

2. *First Article Testing*

The OAG raises an issue in footnote 7 of its Comments regarding our testing of the 1074 v.2 modules. We clarify that our December 2006 agreement with Cellnet essentially "accepted" all designs of modules currently installed in the field, which also meant we did not have a right to conduct First Article Testing (the contractual term for engineering acceptance review) on the module versions already in place. At that time, we had a small population of 1074 v.2 modules installed, and had no reason to believe that there was a problem with the 1074 v.2, or any other type of Cellnet module, such that we should not accept them. Thus by the terms of our contract, the 1074 v.2 module type was included in the "accepted" group and was not subject to First Article Testing.

If Cellnet made modifications to the 1074 v.2 modules during or after that time, we were not told about the modifications and therefore had no contractual basis to initiate First Article Testing. Therefore, even though a majority of the 1074 v.2 modules were installed *after* December 2006, as the OAG points out, that module type was already "accepted" *before* December 2006, and there was no contractual basis (or practical reason that we knew of at the time) to test them.

3. *Cellnet Remedies*

The OAG requests clarification of our statement that, in the event of any recovery from Cellnet related to the 1074 v.2 failures, we will provide customers with their share of the proceeds. Because we are only now in the dispute resolution process

with Cellnet, it is difficult to determine at this time the appropriate disposition of any financial remedies. In part for this reason, we have offered a resolution in this Docket that provides financial benefits to customers for the inconvenience they experienced. Our proposal attempts to strike an appropriate balance between various considerations, including: compensating customers for the quality of service they received, and providing for reasonable cost recovery for the natural gas they used.

Thus, we believe the most appropriate way to address any potential proceeds from Cellnet at this time would be to condition approval of our proposal with the requirement that we file with the Commission, a proposal for approval of the disposition of such proceeds within 60 days of any final resolution or disposition of the ongoing dispute resolution process. In this way, parties such as the OES, OAG and others will have an opportunity to provide the Commission with their view of the appropriate disposition, which can be better assessed once the specific nature of any such award is known – and leaves the ultimate decision regarding the disposition of the proceeds with the Commission.

4. *1074 v.4 Replacement Module*

While the 1074 v.4 model module did not pass our acceptance testing, it did not pose the same failure risk as the drive-related issues of the 1074 v.2 model module. As we expected, the 1074 v.4 module performed well through the 2008-2009 winter. Our records indicate that approximately 50 of the approximately 77,800 (or 0.06%) 1074 v.4 model modules have failed. This level of failures is within a range that we would expect.

It is possible that some customers currently in the rebilling hold queue were affected by 1074 v.4 model module failures. We have proposed to provide the remedies proposed in this Docket to all customers currently in the rebilling hold queue, so these customers would receive the same service quality credits, repayment terms, and all other provisions of our proposed rebilling plan. We believe that this is an appropriate and non-discriminatory way of treating our customers.

At this time, we do not believe it appropriate to prospectively extend the remedies proposed in this Docket to customers with a 1074 v.4 module currently installed on their meter should a module problem occur in the future. Equipment failures can, and do, occur without an impact to the quality of service received by the customer. Our offer of service quality credits is for the customers currently in our rebilling hold queue, and reflects our acknowledgement that the overall quality of service we

provided these customers did not meet our expectations. It is not because a piece of metering equipment failed.

We have made significant improvements to our processes to identify and resolve potential module failures, which will minimize any billing impacts on any customers experiencing a module malfunction in the future. We are also in the process of improving our bill format and customer communications around all billing errors. As such, we believe that in the future, all customers affected by a billing error, regardless of the equipment that caused the error, should be treated consistent with our tariffs and the Commission's rules.⁴ This will ensure that all of our customers are treated fairly and in a non-discriminatory manner.

As noted above, we have proposed to provide all customers currently in the rebilling hold queue the remedies proposed in this Docket, but we do not believe it is appropriate to do so prospectively for any customers with a certain module type.

5. *Rebilling Plan*

a. Verifiable Changes in Usage

The Company will consider all customers' verifiable change in usage when determining an appropriate rebilled amount, not just those customers without sufficient historical usage. As one indicator of our efforts to proactively identify customers with verifiable changes in their usage, we cross-referenced customers in the rebilling hold queue against those that received rebates under our Conservation Improvement Program.

As of November 2008, we identified approximately 100 customers who received rebates for installing energy efficient furnaces during a relevant time period. In advance of any rebilling, we will update this information and incorporate it into our individual account analysis, and adjust customers' estimated usage as appropriate. As noted below, we have also updated our outbound calling scripts to prompt customers to identify verifiable changes in their usage.

b. Outbound Calling Scripts

We have added the recommended verifiable change in usage language to all of our outbound calling scripts, so that it is included as we work with the CAO on further

⁴ We reiterate our commitment to communicate significant issues affecting our customers to Commission Staff, and keep them apprised of developments.

enhancements to our customer rebilling communications. We are additionally making corresponding updates to our Dedicated Billing Specialist training to emphasize the importance of working with customers to identify these changes and their impact to the customer's estimated billing.

Further, the OAG suggests we add language to all outbound call scripts that allows for a discussion about the affected customers' individual circumstances that may necessitate an extended repayment plan. We prefer to not include such language. In our experience, some customers can take offense if they feel we are initiating a dialogue that implies that we expect they may not be able to pay their energy bill.

Our Specialists are trained to listen for clues that a customer may be experiencing circumstances that make it difficult for the customer to pay the rebilled amount. Most times, the customer will state their circumstance, such as a layoff or medical situation. We believe that if the customer does not initially indicate a potential hardship, our proactive dialogue about available payment arrangements is a good opportunity for the customer and/or the Specialist to identify household circumstances that would make it difficult for the customer to pay the rebilled amount. As outlined in our proposed Rebilling Plan, in these circumstances, our Specialists will engage our Personal Accounts Representative team to further assist the customer.⁵

6. *Commission Rules*

As discussed in our prior filings, we believe the Commission's Rules and our natural gas tariffs provide the Commission with the guidance necessary to resolve this Docket. There are specific rules and tariff sections that address correcting natural gas billing errors and natural gas meter equipment malfunctions.⁶ The AMR module issues experienced by our natural gas customers, specifically the 1074 v.2 module failure, fall squarely within these rules and natural gas tariff sections.

The OAG claims that the Commission's Rules only apply to natural gas meter concerns related to normal wear and tear, and therefore are of no consequence here because of the systemic nature of the 1074 v.2 module failure. But the Commission's Rules and our natural gas tariff present remedies to resolve billing issues on a customer-by-customer basis, regardless of the cause of equipment failure.

⁵ Please see our March 9, 2009 Filing in this Docket (Attachment C, Proposed Rebilling Plan, page 10) for more details.

⁶ See Minn. R. 7820.3900 (provides remedies for adjusting billing errors caused by inaccurate natural gas meters); Minn. R. 7820.4000 (provides remedies for natural gas billing errors); Natural Gas Tariff Book, Section No. 6 at § 3.7 (describes the mechanisms for adjusting billing errors caused by inaccurate natural gas meters).

Furthermore, the Commission recently affirmed the applicability of its natural gas rebilling rules when it approved the Greater Minnesota Gas petition to rebill a substantial portion of its customers for billing errors stemming from the application of an incorrect pressure factor for approximately eight years.⁷

For these reasons, we believe the Commission's Rules and our natural gas tariffs define the appropriate resolution of this Docket.

C. Comments of the Suburban Rate Authority

We appreciate the SRA's support of our proposed Rebilling Plan. The Company confirms that, as mentioned above, we will not seek recovery from ratepayers, at any time, for the loss we have incurred or will incur associated with the replacement of the faulty modules.

Further, we will take the SRA's suggestions to highlight customer obligations in our Installment Payment Plan letter when we work with the CAO on our proposed customer communications.

⁷ *In the Matter of the Petition of Greater Minnesota Gas, Inc. For Notification of Undercharges Associated with Billing Error*, Order Accepting Petition and Requiring Other Action, Docket No. G-022/M-08-519 (October 28, 2008).

CONCLUSION

The Company appreciates the comments of the OES, OAG, and SRA. We offer these Reply Comments, and respectfully request the Commission approve our Proposed Resolution, as supplemented in this filing.

Dated: April 17, 2009

Northern States Power Company,
a Minnesota corporation

RESPECTFULLY SUBMITTED,

/s/
By: _____
ALLEN KRUG
MANAGING DIRECTOR
GOVERNMENT AND REGULATORY AFFAIRS

CERTIFICATE OF SERVICE

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

DOCKET NOS. G-002/CI-08-871 AND E,G-002/M-09-224

Dated this 17th day of April 2009

/s/

Carole A. Wallace

Investigation into Northern States Power for
Inaccurate Gas Meters, Recalculation of Bills
and Related Issues.

G002/CI-08-871
4-14-2009

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Service Rules Tariffs

E,G002/M-09-224

4-3-2009

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