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April 12, 2010

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—VIA ELECTRONIC FILING—

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

PUBLIC SERVICE COMMISSION

RE: AMENDED PETITION
METER EQUIPMENT MALFUNCTIONS
DOCKET Nos. G-002/CI-08-871 and E, G-002/M-09-224

Dear Dr. Haar:

Northern States Power Company, a Minnesota corporation (“Xcel Energy” or the “Company”) submits this Amended Petition for Approval of Proposed Standards for Investigating and Repairing Malfunctioning Meter Equipment to the Minnesota Public Utilities Commission (the “Commission”) in accordance with the Commission’s October 26, 2009 ORDER REQUIRING REFUND AND OTHER MEASURES TO ADDRESS ISSUES IDENTIFIED IN INVESTIGATION and the Commission’s March 10, 2010, NOTICE OF EXTENDED REPLY COMMENT PERIOD in the above-referenced Dockets.

We have served a copy of this filing on all parties on the attached service lists.

Please contact Bria Shea at (612) 330-6064 or bria.e.shea@xcelenergy.com or me at (612) 330-5601 or jody.l.londo@xcelenergy.com if you have any questions.

Sincerely,

/s/

JODY LONDO
MANAGER, REGULATORY ADMINISTRATION

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 THE PETITION OF
NORTHERN STATES POWER COMPANY,
A MINNESOTA CORPORATION FOR
APPROVAL OF MODIFICATION TO THE
SERVICE RULES IN THE COMPANY'S
NATURAL GAS AND ELECTRIC TARIFFS

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

AMENDED PETITION

INTRODUCTION

Northern States Power Company, a Minnesota corporation ("Xcel Energy" or the "Company") submits to the Minnesota Public Utilities Commission (the "Commission") this Amended Petition for approval of proposed standards for investigating and repairing malfunctioning meter equipment. The Company proposes including these standards in the Service Rules contained in its Natural Gas and Electric Rate Books pursuant to Minn. Stat. § 216B.16, and related Minnesota Rules. We believe the proposed investigation and repair standards comply with the direction we received in the Commission's October 26, 2009 ORDER REQUIRING REFUND AND OTHER MEASURES TO ADDRESS ISSUES IDENTIFIED IN INVESTIGATION and the Commission's March 10, 2010, NOTICE OF EXTENDED REPLY COMMENT PERIOD in the above-referenced Dockets.

Specifically, the Commission's October 26, 2009 ORDER directed Xcel Energy to modify the proposed tariff filed with our March 6, 2009 PETITION TO MODIFY OUR METERING AND BILLING TARIFFS in Docket No E,G002/M-09-224, to:

- Set a specific deadline for investigating a faulty meter that is shorter than 10 calendar days;
- Set a specific deadline for remediation of malfunctioning metering equipment and do not allow rebilling for the period between a report of malfunction and the remedy if not timely; and
- Allow other sources, including Xcel Energy's internal controls, to trigger the timing requirements for meter investigation and remediation.

Consistent with our January 25, 2010 Petition in the above-referenced Dockets, we believe our proposed tariff provisions strike a balance that benefits customers and the Company in the following ways:

- The proposed timelines are reasonable and provide standards to objectively measure the Company's performance in responding to malfunctioning meter equipment;
- Customers will be assured of the Company's consistent and timely response to reported issues; and
- In those instances where the Company does not resolve a meter equipment issue in the defined timeframe, customers are provided a reasonable remedy.

With this Amended Petition, we propose an updated Meter Equipment Malfunction Tariff that specifically addresses the Minnesota Office of Energy Security's ("OES") February 26, 2010 Comments regarding our response timelines to potential meter equipment issues. We additionally propose to include a Meter Equipment Malfunction definition to the Tariff, and incorporate the clarifying language changes that the OES recommended to several of our proposed Exclusions from performance results.

I. SUMMARY OF FILING

A one-paragraph summary of the filing accompanies this Petition pursuant to Minn. R. 7829.1300, subpt. 1.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. R. 7829.1300, subpt. 2 and Minn. Stat. § 216.17, subd. 3, Xcel Energy has electronically filed this document. A summary of the filing has been served on all parties on the attached service list.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subpt. 3, Xcel Energy provides the following required information.

A. Name, Address, and Telephone Number of Utility

Northern States Power Company,
a Minnesota corporation
414 Nicollet Mall
Minneapolis, MN 55401
(612) 330-5500

B. Name, Address, and Telephone Number of Utility Attorney

Mara Koeller
Associate Attorney
Xcel Energy Services Inc.
414 Nicollet Mall - 5th Floor
Minneapolis, MN 55401
(612) 215-4605

C. Date of Filing and Date Modified Tariff Takes Effect

The date of this filing is April 12, 2010. Xcel Energy proposes that this miscellaneous tariff change become effective 60 days after the Commission's Order approving this Petition.

D. Statute Controlling Schedule for Processing the Filing

Minn. Stat. §216B.16, subd. 1 prescribes general time lines for rate and tariff changes, including, but not limited to, a requirement of 60 days notice of a proposed tariff change.

The Commission's Rules define this filing as a "miscellaneous tariff filing" under Minn. R. 7829.0100, subp. 11 because no determination of Xcel Energy's revenue requirement is necessary. Minn. R. 7829.1400, subpt. 1 and 4 permit comments in response to a miscellaneous filing to be filed within 30 days, and reply comments to be filed no later than 10 days thereafter.

E. Utility Employee Responsible for Filing

Jody Londo
Manager, Regulatory Administration
Xcel Energy Services Inc.
414 Nicollet Mall - 7th Floor
Minneapolis, MN 55401
(612) 330-5601

IV. EFFECT OF CHANGE UPON XCEL ENERGY'S REVENUE

No change to Xcel Energy revenue is expected as a result of these proposed tariff modifications.

V. DESCRIPTION AND PURPOSE OF FILING

A. Background

As part of our March 6, 2009 response to the natural gas meter reading module failures investigated in Docket No. G-002/CI-08-871, we proposed to modify the Service Rules contained in our natural gas tariff to provide a definitive time period in

which the Company would respond to customer inquiries regarding the accuracy of their natural gas meter equipment. Our proposed modifications mirrored existing tariff provisions contained in the Service Rules of the Xcel Energy Electric Rate Book, which require the Company replace a malfunctioning meter within ten days of the customer's inquiry.¹

While these previously proposed tariff modifications addressed the response time to *investigate* potential meter equipment issues identified through customer inquiries, a timeline for *resolving* a malfunction was not included at that time. In addition, the proposed tariff did not address the timeline to investigate and resolve a meter equipment malfunction identified through the *Company's* internal controls processes.

The Commission's October 26, 2009 ORDER in Docket Nos. G002/CI-08-871 and E,G-002/M-09-224 requires that the Company propose revised electric and natural gas tariffs that include timelines to investigate and resolve all meter equipment malfunctions. On January 25, 2010, we proposed natural gas and electric tariff modifications that we believe addressed the requirements in the Commission's above-referenced Order.

On February 26, 2010, the OES filed Comments on our Petition, recommending that we submit a revised proposal that provides for a single timeline in which to investigate and remediate meter equipment issues – regardless of whether they are reported by a Customer or identified through Company processes.

We outline below a revised natural gas and electric Meter Equipment Malfunction Tariff proposal that integrates our response to meter equipment issues into a single timeline and clarifies our proposed Exclusions. We provide as Attachment A to this filing, redline and clean versions of our proposed tariff modifications.

B. Description of the Tariff Modifications

In summary, we are proposing to establish and report our *average annual performance* results for responding to meter equipment malfunctions against approved performance Targets. Measuring our average annual performance against a reasonable Target is consistent with Minn. R. 7820.3700, Subp. 4 for electric, and Minn. R. 7820.3900, Subp. 4 for natural gas, which requires:

Failure to check faulty meter. If a customer has called to the utility's attention doubts as to the meter's accuracy and the utility has failed *within a*

¹ The ten day response to customer inquiries regarding the accuracy of electric meters is also required by Minn. R. 7826.1000.

reasonable time to check it, there shall be no back billing for the period between the date of the customer's notification and the date the meter was checked.
[Emphasis added]

Reporting our average annual performance against a Target is also consistent with how the Commission measures the quality of our performance for other operational customer service areas, such as reliability, gas emergency response, and meter reading.² We believe our proposal is consistent with the Commission's Rules that require our response time to be "reasonable," and with how the Commission has historically established and measured the quality of other aspects of our service to customers.

We outline below our proposed performance Targets for both natural gas and electric meter equipment investigations and remediation. We have based our proposed Targets largely on the requirements set forth in the Commission's October 26, 2009 ORDER, but also considering our 2009 performance, existing Tariff and Rule requirements, and our current contractual agreement with Cellnet Technology Midwest, Inc. ("Cellnet"), our meter maintenance supplier. For reference, we provide a report of our actual 2009 performance as Attachment B to this filing.³

In terms of our proposed timelines to investigate and remediate potential meter equipment issues, we note that with this Amended Petition, we have integrated our response to both customer- and Company-identified issues into a single timeline and performance target. However, our proposed timeline to resolve natural gas meter equipment issues continues to differ from that of resolving electric meter equipment issues. The reason for this difference is primarily due to the nature of natural gas service compared to electric, but also due to differing provisions of our contract with Cellnet, which we further explain below.

1. *Natural Gas Meter Equipment*

We propose our average annual response Target to *investigate* a report of potentially malfunctioning natural gas meter equipment (which may involve a malfunction of the meter, the module, or both) as *nine* calendar days from the date the potential issue is identified.

In its meter maintenance role for Xcel Energy, Cellnet is the first responder to the majority of field meter maintenance orders. If, upon investigation, Cellnet determines

² MN Electric Rate Book and MN Natural Gas Rate Book Sections No. 6, Sheet Nos. 7.1 through 7.10.

³ In 2009, we did not track our time to investigate meter equipment issues compared to the time to remediate them, so our performance results are indicative only of the time it took us to resolve any issue.

that the *Automated Meter Reading (“AMR”) module* is the malfunctioning equipment, they are generally able to repair or replace it immediately. In our experience, Cellnet is able to either confirm that no malfunction exists, or resolve the identified meter equipment malfunction for the majority of the field orders that they investigate.

But, under our Agreement with Cellnet, they do not perform the work to replace natural gas *meters* that have malfunctioned. So, if Cellnet determines that the meter is the malfunctioning equipment, they must refer the field order to an Xcel Energy field technician. In this case, the time to remediate the equipment issue is necessarily longer because a natural gas meter replacement generally requires disruption of the customer’s natural gas service, so we typically must make arrangements with the customer.⁴

For these reasons, we propose to measure and report our performance to investigate and remediate potentially malfunctioning natural gas meter equipment in the following three categories:

- (1) *Investigate and Remediate* – a field investigation of potentially malfunctioning meter equipment that the technician determines either is not malfunctioning, or *resolves* during the visit;
- (2) *Investigate and Refer* – a field investigation of potentially malfunctioning meter equipment that the technician confirms is malfunctioning, but is *unable to resolve* during the visit; and
- (3) *Remediate upon Referral* – the resolution of a confirmed meter equipment malfunction, as referred from an initial field investigation.

In summary, we propose the following natural gas meter equipment average annual response time performance targets:

Type of Response	Performance Target (Average Annual Response)	Average Annual Response (from issue identification)
Investigate and Remediate	9 calendar days ¹	9 calendar days
Investigate and Refer	9 calendar days ¹	9 calendar days
Remediate upon Referral	15 calendar days ²	24 calendar days

¹ As measured from the point the potential meter equipment issue is identified and a DR order issued.

² As measured from the point a meter equipment issue is confirmed via the field investigation and referral order issued.

We have proposed the above *Investigate and Refer* and *Investigate and Remediate* timelines in compliance with the Commission’s October 26, 2009 Order that requires that we

⁴ When we disrupt customers’ natural gas service, we perform various safety checks, relight pilot lights, etc.; to do so requires access to the inside of the customer’s home.

propose a specific deadline that is less than ten days to investigate reported issues. We feel that it is important for the Commission to understand that while our proposed nine day timeline to investigate natural gas meter equipment malfunctions complies with the Commission's Order, it is in conflict with our actual 2009 performance results, and our contractual provisions with Cellnet, which provides them a longer timeline to investigate potentially faulty natural gas meter equipment.⁵

Additionally, we note that there would likely be costs associated with modifying our Cellnet Agreement to require a shorter timeline for their response, which we believe must be balanced with any incremental benefits of a quicker response for our customers. Given these facts, we propose to review and report on our performance within 60 days after the conclusion of the first 12 months under the terms of the approved tariff, and at that time recommend to either modify or maintain the approved timelines.

2. *Electric Meter Equipment*

We propose our average annual response Target to *investigate* a report of potentially malfunctioning electric meter equipment (which may involve a malfunction of the meter, the module, or both) as *nine* calendar days from the date the potential issue is identified.

We propose our average annual response time to *resolve* an electric meter equipment issue as *ten* calendar days from the date the potential issue is identified, consistent with our current electric tariff and Minn. R. 7826.1000.⁶ As noted in Section B.1. above, the Target we propose for resolving an *electric* meter equipment malfunction is shorter than for resolving a *natural gas* meter equipment malfunction. This is because the electric AMR equipment is integrated into the electric meter, so the resolution of *any* "dead register" electric AMR or meter malfunction is typically to replace the combined meter/module.

Also contributing to the shorter timeline for electric meter equipment malfunctions are the fact that electric meter replacements do not typically require customer coordination like natural gas meters; our electric meter equipment contractual provisions with Cellnet supports these proposed timelines; and, because Cellnet performs electric meter replacements under our Agreement, this typically eliminates any time and coordination associated with a hand-off to a separate work force.

⁵ In 2009, our overall average annual response to meter equipment malfunctions was 11.8 calendar days, which includes access issues, customer equipment issues, equipment without issue upon investigation, and meter exchange orders.

⁶ MN Electric Rate Book Section No. 6, Sheet No. 13

For these reasons, we propose to measure and report our performance to investigate and remediate potentially malfunctioning electric equipment in the following three categories:

- (1) *Investigate and Remediate* – a field investigation of potentially malfunctioning meter equipment that the technician determines either is not malfunctioning or *resolves* during the visit;
- (2) *Investigate and Refer* – a field investigation of potentially malfunctioning meter equipment that the technician confirms is malfunctioning, but is *unable to resolve* during the visit; and
- (3) *Remediate upon Referral* – the resolution of a confirmed meter equipment malfunction, as referred from an initial field investigation.

In summary, we propose the following electric meter equipment average annual response time performance targets:

Type of Response	Performance Target (Average Annual Response)	Average Annual Response (from issue identification)
Investigate and Remediate	9 calendar days ¹	9 calendar days
Investigate and Refer	9 calendar days ¹	9 calendar days
Remediate upon Referral	1 calendar days ²	10 calendar days

¹ As measured from the point the potential meter equipment issue is identified and a DR order issued.

² As measured from the point a meter equipment issue is confirmed via the field investigation and a referral order is issued.

For reference, we provide the below summary of our proposed natural gas and electric meter equipment response timelines:

Response Timeline Summary

Response Type	<i>Performance Targets</i> (Average Annual Calendar Days)	
	Natural Gas	Electric
Investigate and Remediate	9 ¹	9 ¹
Investigate and Refer	9 ¹	9 ¹
Remediate upon Referral	15 ²	1 ²

¹ As measured from the point the potential meter equipment issue is identified and a DR order issued.

² As measured from the point a meter equipment issue is confirmed via the field investigation and referral order issued.

We believe these annual performance targets are reasonable, consistent with the Commission’s Rules and October 26, 2009 ORDER, and provide our customers with both timely investigation and remediation of potential meter equipment issues. We outline our proposed reporting of our performance results in Section C. below.

We outline in Section B.3 below, proposed Exclusions from our above performance results. Additionally, we outline in Section B.4. below, how we propose to adjust individual customer bills when our response to an identified electric or natural gas meter equipment malfunction does not meet the performance Target.

3. *Exclusions*

Because there are circumstances outside of the Company's control that can impact our ability to meet the timelines we have proposed to investigate and resolve potential meter equipment malfunctions, we have outlined a list of reasonable Exclusions in our proposed tariff. These exclusions fall into three categories: Meter Access, Volume and Environmental, and Equipment-Related.

- *Meter Access:* Access to the meter equipment is necessary to complete an investigation or repair, and if we are unable to gain access then the timelines need to be waived.
- *Volume and Environmental.* There may be instances where Company resources need to be diverted to address other maintenance issues, such as during a flood. There are also circumstances where the volume of potential meter equipment to be investigated or repaired is larger than the Company can address within these purposefully short timelines applicable for routine investigations. For example, where a flood has damaged a large number of meters the volume of affected meters may be greater than what our staff can address within the normal timeline.
- *Equipment:* Availability issues and other items outside our control can limit our ability to respond to a reported problem within the indicated timelines. This would include situations in which customer equipment is not compliant with codes or Company requirements.

We note that in this Amended Petition, we have incorporated the clarifying language changes to several of the Exclusions that the OES recommended in their February 26, 2010 Comments. To respond to the OES Comments regarding the pre-planned or scheduled meter equipment replacements, we have added a Meter Equipment Malfunction definition, as follows:

The confirmed inaccurate measurement of a customer's natural gas or electric usage by the Xcel Energy meter or other Company-installed usage measurement equipment installed for billing purposes at the customer location.

We note that we have specifically used the word, "confirmed" when describing the inaccurate measurement of a customer's usage. Our intent with this language is to separate those meter equipment issues that are, or have, caused our customers to be billed inaccurately from those issues that *may* or *may not* be affecting our customers'

billing. For example, we may identify an issue with a certain meter lot or type of AMR module that affected specific customers, but that may later be found to be a symptom of a larger problem affecting all or a significant portion of the customers having that same equipment.

In this case, our proposed Meter Equipment Tariff would apply to only those customers to whom the issue specifically affected. In addition, we may develop and execute an operational plan that proactively removes and replaces all remaining equipment of that type in the field; the performance Targets in the Meter Equipment Tariff would *not* apply to this proactive equipment replacement, because we do not have certainty that each piece of the equipment was malfunctioning. We also note that this type of proactive equipment replacement could involve significant volume that we would need to balance over a longer period than the timelines we propose to apply to meter equipment malfunctions under this Tariff.

We acknowledge that these issues could affect individual customer billings. To the extent that we identify a customer(s) affected by one of these preplanned equipment replacement plans was inaccurately billed as a result of malfunctioning meter equipment, we will apply Minn. R. 7820.3900 and 7820.3700 for natural gas and electric customers, respectively, using the date that we *confirmed* that the customer's meter equipment was malfunctioning as our "date of discovery."

4. *Billing Adjustments*

In this proposed Tariff, we are proposing to report our average annual response times to investigate and resolve natural gas and electric meter equipment issues against various performance Targets. For customer billing purposes, we are proposing a single timeline that would apply to both electric and natural gas meter equipment malfunctions, with the exception our natural gas Remediate upon Referral malfunctions and those malfunctions that fall into one of the approved Exclusions.

With the exception of the approved Exclusions, if we do not resolve a meter equipment malfunction for any individual customer in ten days from the date it is first identified (20 days for natural gas Remediate upon Referral malfunctions), we will not bill the customer for any under-billing amount owed for service occurring between the date the potentially malfunctioning meter equipment was first identified and the date we ultimately resolved the problem.

With regard to the Exclusions, we will evaluate individually the circumstances of each Exclusion, taking into consideration the scope of the issue, any billing impact on the affected customer(s), and the Company's ability and plan to resolve the problem – and will apply the Commission's Billing Error Rules.

We acknowledge that our proposed timeline for making billing adjustments is shorter than our proposed performance Target for natural gas Remediation upon Referral meter equipment malfunctions. However, we believe that these proposed billing adjustment timelines are the right thing to do for our customers; facilitates administrative efficiencies in applying any necessary billing adjustments to individual customer accounts; and, provides the Company the proper incentive to resolve meter equipment malfunctions as quickly as possible.

C. Reporting

We propose to report our performance annually in conjunction with our Annual Service Quality Reports.⁷ In our Meter Equipment Investigation and Remediation report, we propose to provide the following by Month, and totals for the calendar year:

- Volume of Investigate and Remediate field orders
- Volume of Investigate and Refer field orders
- Volume of Remediate upon Referral field orders
- Average Response Time for each of the above categories by Month and Year

Our Report will also provide the volume of Excluded field orders, per the approved Tariff. We will additionally track and report our average response time in the Meter Access Exclusion category.

D. Baseline Performance Level

As outlined in the Sections above, we have proposed performance targets in compliance with the Commission's October 26, 2009 Order in Docket Nos. G002/M-08-871 and E,G-002/M-09-224. But, we have made this proposal without the benefit of complete and consistent historical performance data on which to base our proposed targets, and with Cellnet contractual terms that provide for a longer than proposed response time to identified natural gas meter equipment malfunctions.⁸ We additionally note that we believe that it is necessary to consider our performance and any associated go-forward benchmarks over more than one 12-month period for a true picture of our actual performance.

For these reasons, we propose to review and report on our performance within 60 days after the conclusion of the first 12 months under the terms of the approved

⁷ Annual Natural Gas Service Quality Report due May 1 of each year, and provides performance results for the prior calendar year; Annual Electric Service Quality Report as required by Minn. R. 7826.0500, due April 1 of each year.

⁸ Modifying the contractual terms would require negotiation and would likely result in incremental cost.

tariff, and at that time, recommend to either modify or maintain the approved timelines.

CONCLUSION

We believe our proposed tariff modifications are in the public interest because they provide our customers reasonable, specific, and consistent performance targets for resolution of identified meter equipment issues. Xcel Energy respectfully requests that the Commission approve this Amended Petition, the proposed tariff additions to the Company's Service Rules in its Natural Gas and Electric Rate Books, and proposed post-implementation performance Target review process.

Dated: April 12, 2010

Northern States Power Company,
a Minnesota corporation

RESPECTFULLY SUBMITTED,

/s/

By: _____
JODY LONDO
MANAGER
REGULATORY ADMINISTRATION

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 THE PETITION OF NORTHERN STATES POWER COMPANY, A MINNESOTA CORPORATION FOR APPROVAL OF MODIFICATION TO THE SERVICE RULES IN THE COMPANY'S NATURAL GAS AND ELECTRIC TARIFFS

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

AMENDED PETITION

SUMMARY

Please take notice that on April 12, 2010, Northern States Power Company, a Minnesota corporation ("Xcel Energy" or the "Company") filed with the Minnesota Public Utilities Commission (the "Commission") an Amended Petition for approval of standards for investigating and repairing malfunctioning meter equipment. The Company proposes including the standards in the Service Rules contained in its Natural Gas and Electric Rate Books pursuant to Minn. Stat. § 216B.16 and related Minnesota Rules, and the Commission's October 26, 2009 ORDER REQUIRING REFUND AND OTHER MEASURES TO ADDRESS ISSUES IDENTIFIED IN INVESTIGATION and the Commission's March 10, 2010, NOTICE OF EXTENDED REPLY COMMENT PERIOD in the above-referenced Dockets..

CERTIFICATE OF SERVICE

I, Carole Wallace, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

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

xx electronic filing

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

Dated this 12th day of April 2010

/s/

Carole Wallace

Service List Name	First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
OFF_SL_8-871_1	Aakash	Chandarana	achandarana@briggs.com	BRIGGS and MORGAN	2200 IDS Center 80 South 8th Street Minneapolis, MN 554022157	Paper Service	No
OFF_SL_8-871_1	Bill	Bullard		South Dakota Public Utilities Commiss	Capitol Building Pierre, SD 575015070	Paper Service	No
OFF_SL_8-871_1	Burl W.	Haar	burl.haar@state.mn.us	MN Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	No
OFF_SL_8-871_1	Christopher	Clark	christopher.b.clark@xcelen ergy.com	Xcel Energy	5th Floor 414 Nicollet Mall Minneapolis, MN 554011993	Paper Service	No
OFF_SL_8-871_1	Darrell	Nitschke		North Dakota Public Service Commission	600 E. Boulevard Avenue Bismarck, ND 585050480	Paper Service	No
OFF_SL_8-871_1	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_8-871_1	John	Lindell	agorud.ecf@state.mn.us	OAG-RUD	900 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No
OFF_SL_8-871_1	Julia	Anderson	Julia.Anderson@state.mn.u s	MN Office Of The Attorney General	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No
OFF_SL_8-871_1	Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No
OFF_SL_8-871_1	Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Paper Service	No
OFF_SL_8-871_1	SaGonna	Thompson	Regulatory.Records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No

Service List Name	First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
OFF_SL_8-871_1	Sharon	Ferguson	sharon.ferguson@state.mn.us	State of MN - DOC	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No
OFF_SL_8-871_1	William	Stamets	bill.stamets@state.mn.us	Office of the Attorney General	Suite 900445 Minnesota Street St. Paul, MN 551012127	Electronic Service	No

Service List Name	First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret
OFF_SL_09-224_1	Burl W.	Haar	burl.haar@state.mn.us	MN Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes
OFF_SL_09-224_1	John	Lindell	agorud.ecf@state.mn.us	OAG-RUD	900 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No
OFF_SL_09-224_1	Julia	Anderson	Julia.Anderson@state.mn.us	MN Office Of The Attorney General	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No
OFF_SL_09-224_1	Megan	Hertzler	megan.hertzler@xcelenergy.com	Xcel Energy	414 Nicollet Mall 5th Floor Minneapolis, MN 554011993	Paper Service	No
OFF_SL_09-224_1	SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No
OFF_SL_09-224_1	Sharon	Ferguson	sharon.ferguson@state.mn.us	State of MN - DOC	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	Yes