



414 Nicollet Mall, 5th floor
Minneapolis, MN 55401

August 18, 2008

The Honorable Kimberly Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

Re: Xcel Energy Operating Companies
Joint Open Access Transmission Tariff – First Revised Volume No. 1
Order No. 890 Compliance Filing
Docket No. OA07-39- 002
Docket No. OA08-71- 001

Dear Secretary Bose:

Pursuant to section 206 of the Federal Power Act, 16 U.S.C. § 824e, Part 35 of the Federal Energy Regulatory Commission's ("FERC" or "Commission") regulations, 18 C.F.R. Part 35 (2008), Order No. 890, *et al.*,^{1/} and the Commission's April 17, 2008 order issued in this proceeding,^{2/} Xcel Energy Services Inc. ("XES") hereby submits revised tariff sheets to the Xcel Energy Operating Companies Joint Open Access Transmission Tariff ("Joint OATT"), First Revised Volume No. 1.^{3/} Consistent with the April 17 Order, XES requests that this compliance filing and revised tariff sheets be accepted effective August 18, 2008, the date of filing.^{4/}

The tariff changes and compliance filing are being submitted by XES on behalf of the Xcel Energy Operating Companies. The Xcel Energy Operating Companies consist of Public Service Company of Colorado ("PSCo"), Southwestern Public Service Company ("SPS"), Northern States Power Company, a Minnesota corporation ("NSPM") and Northern States Power Company, a Wisconsin corporation ("NSPW") (jointly the "NSP Companies"). The four

^{1/} *Preventing Undue Discrimination and Preference in Transmission Service*, 72 Fed. Reg. 12266 (Mar. 15, 2007), FERC Stats. & Regs. ¶ 31,241 (2007) ("Order No. 890"), *order on reh'g*, 73 Fed. Reg. 2984 (Jan. 16, 2008), FERC Stats. & Regs. ¶ 31,261 (2008) ("Order No. 890-A"), *order on reh'g*, 73 Fed. Reg. 39092 (Jul. 8, 2008), 123 FERC ¶ 61,299 (2008) ("Order No. 890-B"), *reh'g pending*.

^{2/} *Xcel Energy Operating Companies*, 123 FERC ¶ 61,053 (2008) ("April 17 Order").

^{3/} The First Revised Joint OATT was originally accepted for filing in *Xcel Energy Operating Cos.*, Docket Nos. ER99-3916-002 and EC99-101-000 (Letter Order issued Nov. 30, 2000).

^{4/} April 17 Order at P 43.

operating companies are all utility operating company subsidiaries of Xcel Energy Inc., a public utility holding company pursuant to the Public Utility Holding Company Act of 2005. XES is the service company subsidiary for the Xcel Energy Inc. holding company system.

I. BACKGROUND

On February 16, 2007, the Commission issued Order No. 890, revising the *pro forma* tariff originally established in Order No. 888. The Commission required, among other things, that transmission providers make a section 206 compliance filing adopting the revised *pro forma* tariff language as set forth in Order No. 890. The Commission established a series of compliance deadlines to implement those reforms. On July 13, 2007, in compliance with Order No. 890, XES filed revisions to the Joint OATT on behalf of the Xcel Energy Operating Companies.⁵

On December 7, 2007, XES, on behalf of PSCo and SPS, proposed Attachment R-PSCo and Attachment R-SPS (collectively, "Attachment R"), containing proposed regional transmission planning processes for those operating companies.⁶ As XES noted in the transmittal letter accompanying the December 7 Filing, the transmission planning compliance filing for the NSP Companies was submitted in a contemporaneously filed compliance filing by the Midwest Independent Transmission System Operator, Inc. ("Midwest ISO").⁷

The April 17 Order accepted XES's July 13, 2007 Filing, but found, as discussed below, that XES's submission of the *pro forma* section 2.2 was premature, since the Commission had not yet accepted XES's proposed Attachment R, and directed XES to re-file the rollover reform language adopted in Order No. 890 within 30 days of the Commission's issuance of an order accepting XES's transmission planning process in Attachment R.

On May 19, 2008, XES made a compliance filing pursuant to the April 17 Order. Among other things, XES revised section 2.2, Sheet Nos. 16 and 17, of the Joint OATT, re-inserting the pre-Order No. 890 language, as directed by the Commission.

On July 11, 2008, the Commission accepted XES's proposed Attachment R for SPS,

⁵ See *Xcel Energy Serv. Inc.*, Docket No. OA07-39-000 (July 13, 2007) ("July 13 Filing").

⁶ See *Xcel Energy Serv. Inc.*, Docket No. OA08-35-000 (December 7, 2007) ("December 7 Filing"). Attachment R-SPS supplements the regional transmission planning process tariff submitted by the Southwest Power Pool, Inc. ("SPP") in Docket No. OA08-61-000.

⁷ Except for certain grandfathered transmission service agreements, all transmission services over the NSP Companies' transmission system are administered by the Midwest ISO. The Midwest ISO is thus the Transmission Provider for the NSP Companies' transmission system. On December 7, 2007, in Docket No. OA08-53-000, the Midwest ISO submitted a transmission planning compliance tariff (Attachment FF to the Midwest ISO tariff) on behalf of itself and most of its transmission-owning members, including the NSP Companies. The Commission accepted the Midwest ISO's compliance filing on May 15, 2008, subject to modification. *Midwest Independent Transmission System Operator, Inc.*, 123 FERC ¶ 61,164 (2008).

subject to further compliance filing.⁸ On July 17, 2008, the Commission accepted XES's proposed Attachment R for PSCo, subject to a further compliance filing.²

II. THIS FILING – ROLLOVER RIGHTS

In Order No. 890, the Commission adopted a five-year minimum contract term in order for a Transmission Customer to be eligible for a rollover right, and an accompanying one-year notice period, and included these requirements in section 2.2 of the *pro forma* OATT. The Commission determined that the rollover reform should be made effective at the time of the Commission's acceptance of the transmission provider's regional planning process.

In Order No. 890-A, the Commission affirmed its finding that the effectiveness of rollover reform must be tied to the acceptance of the transmission provider's coordinated and regional planning process required under Order No. 890 and also provided clarification regarding the implementation of rollover reforms.

XES included the Order No. 890 revised rollover language in section 2.2 of the Joint OATT in the July 13, 2007 Filing, requesting an effective date of July 13, 2007; however, as the April 17 Order points out, XES's transmission planning process (located in Attachment R of the Joint OATT), had not yet been accepted by the Commission.¹⁰ Accordingly, the Commission directed XES to: (1) file revised tariff sheets reflecting the pre-Order No. 890 language of section 2.2, and (2) subsequently re-file the reformed rollover language established in Order No. 890 within 30 days after the Commission accepts XES's Attachment R, with an effective date commensurate with the date of that filing.¹¹

As noted previously, on May 19, 2008, XES submitted a filing in compliance with the April 17 Order that included revised tariff Sheet Nos. 16 and 17, re-inserting the pre-Order No. 890 language in section 2.2 of the Joint OATT. The Commission has not yet acted on that filing.

In light of the Commission's acceptance of XES's proposed Attachment R for PSCo in the July 17 Order, XES now submits, in further compliance with the April 17 Order, revised section 2.2, Sheet Nos. 16 and 17, to include the reformed rollover language established in Order No. 890, as amended by Order Nos. 890-A and 890-B. XES makes this filing within 30 days, as construed by Rule 2007 of the Commission's Rules of Practice and Procedure,¹² of the Commission's July 17 Order on Attachment R-PSCo. This filing date is appropriate because the

⁸ *Xcel Energy Services Inc. – Southwestern Public Service Company*, 124 FERC ¶ 61,029 (2008). The Commission contemporaneously accepted the associated regional SPP transmission planning process tariff in *Southwest Power Pool Inc.*, 124 FERC ¶ 61,028 (2008).

² *Xcel Energy Services Inc. – Public Service Company of Colorado*, 124 FERC ¶ 61,052 (2008) (“July 17 Order”).

¹⁰ April 17 Order at P 43.

¹¹ *Id.*

¹² 18 C.F.R. § 385.2007 (2008).

Commission issued two separate orders regarding the single XES Attachment R filing submitted on December 7, 2007, and this filing is being submitted within thirty days of the latter order.¹³

In addition, on March 17, 2008, XES filed revisions to the Joint OATT in Docket No. OA08-71 to bring the Joint OATT into compliance with Order No. 890-A. XES's March 17, 2008 Filing revised Sheet No. 17; however, section 2.2 was not modified on Sheet No. 17 to re-insert the pre-Order No. 890 language. As such, the March 17, 2008 Filing's Sheet No. 17 included the Order No. 890 Section 2.2 language that had been prematurely filed. To be consistent with Order Nos. 890 and 890-A and the April 17 Order, the instant filing includes a corrected Sheet No. 17, effective March 17, 2008, that re-inserts the pre-Order No. 890 language for section 2.2. Therefore, the effective language of section 2.2 of the Joint OATT will not reflect any Order No. 890 revisions until August 18, 2008.

Because Order No. 890-B recognizes that "the revisions to the language of section 2.2 of the *pro forma* OATT adopted in Order No. 890-A do not properly reflect the obligation of customers rolling over their service to match competing requests for service," it would be inconsistent with Commission policy to file the Order No. 890-A version of section 2.2. Accordingly, the revised section 2.2 – effective August 18, 2008 – reflects the most recent language promulgated by the Commission in Order No. 890-B, consistent with paragraph 154 of Order No. 890-B.

III. ATTACHMENTS INCLUDED WITH THIS FILING

- | | |
|---------------|--|
| Attachment 1: | One Clean and one Redlined revised Tariff Sheet for First Revised Volume No. 1 of the Joint OATT – effective March 17, 2008; |
| Attachment 2: | Clean and Redlined Revised Tariff Sheets for First Revised Volume No. 1 of the Joint OATT – effective August 18, 2008; |
| Attachment 3: | A list of transmission customers who will receive a copy or notice of the instant compliance filing; and |
| Attachment 4: | A list of State Commissions served with a copy of this compliance filing. |

IV. SERVICE

As required by the Commission's Guideline Notice, XES is submitting the instant filing in electronic format to facilitate posting on the Commission's e-library.¹⁴ A copy or notice of

¹³ All firm service over the NSP Companies' system and all firm point-to-point service on the SPS system is taken under the regional OATTs of the Midwest ISO and the SPP, respectively. The only firm transmission service on the SPS system under the Joint OATT is Network Integration Transmission Service using Joint OATT *pro forma* service agreements executed no later than March 2007.

¹⁴ *Notice of Electronic Filing Guidelines for Open Access Transmission Tariffs and Related Filings Pursuant to Commission Order No. 890 and 18 C.F.R. Part 35 and 37*, (issued Apr. 6, 2007) ("Guidelines Notice").

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this filing will also be sent by mail or e-mail to: (i) all State Commissions with jurisdiction over the Xcel Energy Operating Companies; and (ii) transmission service customers taking service under the Joint OATT, notifying them where they can download a copy of this compliance filing. Pursuant to 18 C.F.R. § 35.2(d), a copy of this filing and the revised Joint OATT will be posted for public inspection at offices of Xcel Energy Inc., 414 Nicollet Mall - MP8, Minneapolis, Minnesota 55401. A copy of the revised Joint OATT will also be posted electronically on (i) the Transmission page of the Xcel Energy Inc. web site (www.xcelenergy.com), and (ii) via a link to the Xcel Energy Inc. web site on the OASIS pages of the PSCo, the NSP Companies and SPS.

V. PROPOSED EFFECTIVE DATE; REQUEST FOR WAIVER

Pursuant to Order No. 890, *et al.* and the April 17 Order, XES respectfully requests that the attached revisions to the Joint OATT be accepted for filing August 18, 2008, the date of this filing.

XES respectfully requests waiver of any applicable filing or notice requirements under the Commission's Rules and Regulations as may be necessary to accept the proposed revisions to the Joint OATT on August 18, 2008, as requested above.

VI. COMMUNICATIONS AND SERVICE

XES requests that all Commission orders and correspondence as well as pleadings from other persons concerning this filing be served on each of the following:

Mark C. Moeller
Transmission Business Relations
Xcel Energy - Transmission Services
414 Nicollet Mall - MP8
Minneapolis, MN 55401
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James P. Johnson
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Xcel Energy Services Inc.
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Email: sspina@morganlewis.com

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VII. CONCLUSION

XES and the Xcel Energy Operating Companies sincerely appreciate the Commission's prompt attention to this matter. Please direct any questions regarding this compliance filing to the undersigned at (612) 215-4592. Thank you.

Respectfully submitted,

James P. Johnson

James P. Johnson
Assistant General Counsel
Xcel Energy Services Inc.
On behalf of the
Xcel Energy Operating Companies

Attachments

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 18th day of August, 2008.

Joseph W. Lowell

Joseph W. Lowell
Morgan, Lewis & Bockius LLP
1111 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Attachment 1

**Xcel Energy Operating Companies Joint OATT
Clean and Redlined Sheet No. 17**

Effective March 17, 2008

If at the end of the contract term, the Transmission Provider's Transmission System cannot accommodate all of the requests for transmission service the existing firm service customer must agree to accept a contract term at least equal to a competing request by any new Eligible Customer and to pay the current just and reasonable rate, as approved by the Commission, for such service. This transmission reservation priority for existing firm service customers is an ongoing right that may be exercised at the end of all firm contract terms of one year or longer.

3 Ancillary Services

Ancillary Services are needed with transmission service to maintain reliability within and among the Control Areas affected by the transmission service. The Transmission Provider is required to provide (or offer to arrange with the local Control Area operator as discussed below), and the Transmission Customer is required to purchase, the following Ancillary Services: (i) Scheduling, System Control and Dispatch, and (ii) Reactive Supply and Voltage Control from Generation or Other Sources.

The Transmission Provider is required to offer to provide (or offer to arrange with the local Control Area operator as discussed below) the following Ancillary Services only to the Transmission Customer serving load within the Transmission Provider's Control Area: (i) Regulation and Frequency Response, (ii) Energy Imbalance, (iii) Operating Reserve - Spinning, and (iv) Operating Reserve – Supplemental. The Transmission Customer serving load within the Transmission Provider's Control Area is required to acquire these Ancillary Services, whether from the Transmission Provider, from a third party, or by self-supply.

The Transmission Provider is required to provide (or offer to arrange with the local Control Area Operator as discussed below), to the extent it is physically feasible to do so from its resources or from resources available to it, Generator Imbalance Service when Transmission Service is used to deliver energy from a generator located within its Control Area. The Transmission Customer using Transmission Service to deliver energy from a generator located within the Transmission Provider's Control Area is required to acquire Generator Imbalance Service, whether from the Transmission Provider, from a third party, or by self-supply.

The Transmission Customer may not decline the Transmission Provider's offer of Ancillary Services unless it demonstrates that it has acquired the Ancillary Services from another source. The Transmission Customer must list in its Application which Ancillary Services it will purchase from the Transmission Provider. A Transmission Customer that exceeds its firm reserved capacity at any Point of Receipt or Point of Delivery or an Eligible Customer that uses Transmission Service at a Point of Receipt or Point of Delivery that it has not reserved is required to pay for all of the Ancillary Services identified in this section that were provided by the Transmission Provider associated with the unreserved service. The Transmission Customer or Eligible Customer will pay for Ancillary Services based on the amount of transmission service it used but did not reserve.

Issued By: Kent Larson, Vice President, Transmission
Issued On: August 18, 2008

Effective: March 17, 2008

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If at the end of the contract term, the Transmission Provider's Transmission System cannot accommodate all of the requests for transmission service the existing firm service customer must agree to accept a contract term at least equal to a competing request by any new Eligible Customer and to pay the current just and reasonable rate, as approved by the Commission, for such service. ~~This transmission reservation priority for existing firm service customers is an ongoing right that may be exercised at the end of all firm contract terms of one year or longer.~~

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~~Deleted: Service agreements subject to a right of first refusal entered into prior to [the acceptance by the Commission of the Transmission Provider's Attachment R], unless terminated, will become subject to the five year/one year requirement on the first rollover date after [the acceptance by the Commission of the Transmission Provider's Attachment R].~~

3 Ancillary Services

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Issued By: Kent Larson, Vice President, Transmission
Issued On: August 18, 2008

Effective: March 17, 2008

Filed to comply with orders of the Federal Energy Regulatory Commission in Docket No. RM05-25, issued February 16, 2007, FERC Stats. & Regs. ¶ 31,241 (Order No. 890), and December 28, 2007, 121 FERC ¶ 61,297 (Order No. 890-A).

Attachment 2

**Xcel Energy Operating Companies Joint OATT
Clean and Redlined Sheet Nos. 16 and 17**

Effective August 18, 2008

- 1.49 Third-Party Sale:** Any sale for resale in interstate commerce to a Power Purchaser that is not designated as part of Network Load under the Network Integration Transmission Service that utilizes the Transmission Provider's transmission system.
- 1.50 Transmission Customer:** Any Eligible Customer (or its Designated Agent) that (i) executes a Service Agreement, or (ii) requests in writing that the Transmission Provider file with the Commission, a proposed unexecuted Service Agreement to receive transmission service under Part II of the Tariff. This term is used in the Part I Common Service Provisions to include customers receiving transmission service under Part II and Part III of this Tariff.
- 1.51 Transmission Provider:** Northern States Power Company (Minnesota) (or its intended successor-in-interest to its utility business) and Northern States Power Company (Wisconsin) (collectively "NSP Companies" or as "NSP"), Public Service Company of Colorado ("PSCo"), or Southwestern Public Service Company ("SPS"), each of which is an operating subsidiary of Xcel Energy Inc. ("Xcel"). NSP, PSCo, and SPS are public utilities that own, control, or operate facilities used for the transmission of electric energy in interstate commerce and provide transmission service under the Tariff.
- 1.52 Transmission Provider's Monthly Transmission System Peak:** The maximum firm usage of the Transmission Provider's Transmission System in a calendar month, including all Network Load and Firm Point-To-Point Transmission Service.
- 1.53 Transmission Service:** Point-To-Point Transmission Service provided under Part II of the Tariff on a firm and non-firm basis.
- 1.54 Transmission System:** The facilities owned, controlled or operated by the Transmission Provider that are used to provide transmission service under Part II and Part III of the Tariff.

2 Initial Allocation and Renewal Procedures

- 2.1 Initial Allocation of Available Transfer Capability:** For purposes of determining whether existing capability on the Transmission Provider's Transmission System is adequate to accommodate a request for firm service under this Tariff, all Completed Applications for new firm transmission service received during the initial sixty (60) day period commencing with the effective date of the Tariff will be deemed to have been filed simultaneously. A lottery system conducted by an independent party shall be used to assign priorities for Completed Applications filed simultaneously. All Completed Applications for firm transmission service received after the initial sixty (60) day period shall be assigned a priority pursuant to Section 13.2.
- 2.2 Reservation Priority For Existing Firm Service Customers:** Existing firm service customers (wholesale requirements and transmission-only, with a contract term of five years or more), have the right to continue to take transmission service from the Transmission Provider when the contract expires, rolls over or is renewed. This transmission reservation priority is independent of whether the existing customer continues to purchase capacity and energy from the Transmission Provider or elects to purchase capacity and energy from another supplier.

- 1.49 Third-Party Sale:** Any sale for resale in interstate commerce to a Power Purchaser that is not designated as part of Network Load under the Network Integration Transmission Service that utilizes the Transmission Provider's transmission system.
- 1.50 Transmission Customer:** Any Eligible Customer (or its Designated Agent) that (i) executes a Service Agreement, or (ii) requests in writing that the Transmission Provider file with the Commission, a proposed unexecuted Service Agreement to receive transmission service under Part II of the Tariff. This term is used in the Part I Common Service Provisions to include customers receiving transmission service under Part II and Part III of this Tariff.
- 1.51 Transmission Provider:** Northern States Power Company (Minnesota) (or its intended successor-in-interest to its utility business) and Northern States Power Company (Wisconsin) (collectively "NSP Companies" or as "NSP"), Public Service Company of Colorado ("PSCo"), or Southwestern Public Service Company ("SPS"), each of which is an operating subsidiary of Xcel Energy Inc. ("Xcel"). NSP, PSCo, and SPS are public utilities that own, control, or operate facilities used for the transmission of electric energy in interstate commerce and provide transmission service under the Tariff.
- 1.52 Transmission Provider's Monthly Transmission System Peak:** The maximum firm usage of the Transmission Provider's Transmission System in a calendar month, including all Network Load and Firm Point-To-Point Transmission Service.
- 1.53 Transmission Service:** Point-To-Point Transmission Service provided under Part II of the Tariff on a firm and non-firm basis.
- 1.54 Transmission System:** The facilities owned, controlled or operated by the Transmission Provider that are used to provide transmission service under Part II and Part III of the Tariff.

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Issued On: August 18, 2008

Effective: August 18, 2008

Filed to comply with order of the Federal Energy Regulatory Commission Docket No. OA07-39-000, issued April 17, 2008, 123 FERC ¶ 61,053 (2008).

If at the end of the contract term, the Transmission Provider's Transmission System cannot accommodate all of the requests for transmission service the existing firm service customer must agree to accept a contract term at least equal to a competing request by any new Eligible Customer and to pay the current just and reasonable rate, as approved by the Commission, for such service; provided that, the firm service customer shall have a right of first refusal at the end of such service only if the new contract is for five years or more. The existing firm service customer must provide notice to the Transmission Provider whether it will exercise its right of first refusal no less than one year prior to the expiration date of its transmission service agreement. This transmission reservation priority for existing firm service customers is an ongoing right that may be exercised at the end of all firm contract terms of five years or longer. Service agreements subject to a right of first refusal entered into prior to August 18, 2008 or associated with a transmission service request received prior to July 13, 2007, unless terminated, will become subject to the five year/one year requirement on the first rollover date after August 18, 2008; provided that, the one-year notice requirement shall apply to such service agreements with five years or more left in their terms as of August 18, 2008.

3 Ancillary Services

Ancillary Services are needed with transmission service to maintain reliability within and among the Control Areas affected by the transmission service. The Transmission Provider is required to provide (or offer to arrange with the local Control Area operator as discussed below), and the Transmission Customer is required to purchase, the following Ancillary Services: (i) Scheduling, System Control and Dispatch, and (ii) Reactive Supply and Voltage Control from Generation or Other Sources.

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The Transmission Provider is required to provide (or offer to arrange with the local Control Area Operator as discussed below), to the extent it is physically feasible to do so from its resources or from resources available to it, Generator Imbalance Service when Transmission Service is used to deliver energy from a generator located within its Control Area. The Transmission Customer using Transmission Service to deliver energy from a generator located within the Transmission Provider's Control Area is required to acquire Generator Imbalance Service, whether from the Transmission Provider, from a third party, or by self-supply.

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Issued By: Kent Larson, Vice President, Transmission
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Deleted: orders of the Federal Energy Regulatory Commission in Docket No. RM05-25, issued February 16, 2007, FERC Stats. & Regs. ¶ 31,241 (Order No. 890), and December 28, 2007, 121 FERC ¶ 61,297 (Order No. 890-A).

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Attachment 3

Service List

WAPA DOE
Attn: Accounts Payable
P. O. Box 3700
Loveland, Colorado 80539

Black Hills Power & Light Company
Attn: Andy Butcher, Manager Power Marketing
P.O. Box 1400
Rapid City, SD 57702

BIV Generation Company, L.L.C.
Attn: Shanna Applen, Controller
400 N. Fourth St.
Bismarck, ND 58501

Cargill Power Markets, LLC
Attn: Kim Sather
12700 Whitewater Drive
Minnetonka, MN 55343

PPM Energy
Attn: Colorado Green Joint Venture Group
1125 NW Couch, Suite 700
Portland, OR 97209

Aquila Networks
Attn: Trade Administrator
10750 East 350 Highway, 750-2
Kansas City, MO 64138

Dave Turner
Plains End, LLC
8950 Highway 93
Golden, CO, 80403

BP Powerex
666 Burrard St.
Suite 1400
Vancouver, BC, Canada V632X8

Fountain Valley Power, LLC
Attn: Mr. Joel Stahn, Plant Manager
18693 Boca Raton Heights
Pueblo, CO 81008-2728

Platte River Power Authority
Carol Ballantine
2000 E. Horsetooth Road
Fort Collins, CO 80525-2942

Municipal Energy Agency of Nebraska
Attn: Diane Becker
P. O. Box 95214
Lincoln, Nebraska 68509

Xcel Energy- Merchant Function
Attn: Joe Taylor
1099 18th Street
Denver, CO 80202

PacifiCorp
825 N E Multnomah, Suite 700
Attn: Energy Operations Back Office
Portland, Oregon 97232

Xcel Energy- Merchant Function
Attn: John Svensk
1099 18th Street
Denver, CO 80202

Ridge Crest Wind Partners, LLC
Arnoldo Flores
P.O. Box 581043
North Palm Springs, CA 92258

Intermountain Rural Electric Association
Attn: John Pope
10700 E. 350 Highway
Sedalia, CO 80130-0220

Service List

Rocky Mountain Energy Center, LLC
Attn: Kathy Bonitz
6211 WCR 51
Keenesburg, CO 80643

Yampa Valley Electric Association
Attn: Larry Covillo
P. O. Box 1218
Steamboat Springs, CO 80477-1218

Blue Spruce Energy Center, LLC
Attn: Kathy Bonitz
1751 Powhatan Road
Aurora, CO 80019

Grand Valley Rural Power Lines, Inc.
Attn: Jarrett Broughton
P. O. Box 190
Grand Junction, CO 81502-0190

Black Hills Colorado, LLC
Attn: Mr. Paulo Rocha, Plant Manager
P. O. Box 648
Englewood, CO 80151

Town of Julesburg
Attn: Allen Coyne
100 West Second Street
Julesburg, CO 80737

Tri-State G & T Assoc., Inc.
Attn: Bill Ross
P. O. Box 33695
Denver, Colorado 80233

Center Municipal Gas, Light and Power
Attn: Tim Ruggles
P. O. Box 400
Center, CO. 81125

Colorado Spring Utilities
Electric Department System Operations
Attn: Julie Mathis
P. O. Box 1103
Colorado Springs, CO 80947-0001

Burlington Municipal Light and Power
Attn: Bob Hines
415 15th Street
Burlington, CO 80807

Holy Cross Energy
Attn: Del Worley
P. O. Drawer 2150
Glenwood Springs CO 81602.-2150

Golden Spread Electric Cooperative
Attn: Mr. Robert W. Bryant
P.O. Box 9898
Amarillo, TX 79105

Conoco Phillips
Attn: Henderson W. Cosnahan
600 North Dairy Ashford - CH1081
Houston, TX 77079

Merrill Lynch
Attn: Legal Department-Power
20 East Greenway Plaza, 8th Floor
Houston, Texas 77046

WPS Energy Services, Inc.
Attn: Contract Administration
1716 Lawrence Drive
DePere, WI 54115

Peetz-Logan Interconnect, LLC
Attn: Dean Gosselin
700 Universe Blvd.
Juno Beach, FL 33408

Service List

Signal Hills, LLC
Attn: Steve Shelton
7359 County Road X
Lamar, CO 81052

Lehman Brothers Commodity Services, Inc.
745 Seventh Avenue
New York, NY 10019

Salt River Project
Attn: Jerry Bicknell ISB 220
1600 North Priest
Tempe, AZ 85281

Citigroup Energy, Inc.
Attn: Kolby Kettler
2800 Post Oak Blvd., Suite 500
Houston, TX 77056-6156

Bear Energy, LP
Attn: Legal (Contract Administrator)
700 Louisiana Street, Suite 1000
Houston, TX 77002

Squirrel Creek Energy, LLC
Attn: Joe Condo
One South Wacker Drive, Suite 2020
Chicago, IL 60606

Centennial Power, Inc.
On behalf of Colorado Power Partners
Attn: William Connors
1150 West Century Avenue
Bismarck, North Dakota 58503

Squirrel Creek Energy, LLC
Attn: Jeff Ahrens
One South Wacker Drive, Suite 2020
Chicago, IL 60606

American Atlas Limited
c/o Colorado Energy Management
4845 Pearl East Circle
Boulder, CO 80301-2474

Spindle Hill Energy, LLC
Attn: Project Manager
One South Wacker Drive, Suite 2020
Chicago, IL 60606

Rainbow Energy Marketing Corporation
Attn: Senior Vice President-Operations
919 South 7th Street, Suite 405
Bismarck, ND 58504

Xcel Energy
Attn: Public Records Room
550 15th Street
Denver, CO 80202

Attachment 4

State Commission Service List

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

Ms. Illona A. Jeffcoat-Sacco
Executive Secretary
North Dakota Public Service
Commission
600 E. Boulevard Avenue - Dept. 408
Bismarck, ND 58505-0480

Mr. Robert Norcross
Administrator
Public Service Commission of
Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

Ms. Mary Jo Kunkle
Executive Secretary
Michigan Public Service Commission
Mercantile Building
6545 Mercantile Way
Lansing, MI 48909-7721

Ms. Patricia Van Gerpen.
Executive Director
South Dakota Public Utilities
Commission
500 East Capitol
Pierre, SD 57501

Mr. Doug Dean
Director, Public Utilities Commission of
the State of Colorado
1580 Logan Street
Denver, CO 80203

Ms. Susan K. Duffy, Executive Director
Kansas Corporation Commission
1500 S.W. Arrowhead Road
Topeka, KS 66604-4027

Mr. Ron Montoyo, Records Mgmt
Bureau
New Mexico Public Regulation
Commission
224 East. Palace Avenue
Santa Fe, NM 87503

Joyce Davidson, Director
Corporation Commission of the State of
Oklahoma
2101 N. Lincoln Blvd., Suite 130
Oklahoma City, OK 73105

Public Utility Commission of Texas
Filing Clerk
1701 N. Congress Avenue
Austin, TX 78711