

Minnesota Attorney General: Administrative Rules Proceedings

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Version 3
August 20, 2018

MINNESOTA STATE REGULATIONS

Notice of filing by the Commissioner of Administration

We have received on this date, stamped and filed 2 copies of Rules and Regulations pertaining to the Energy Agency
(Agency or Board)

Regulation No. EA 200 thru 213 (new)

Subject: Electric Utility Information Reporting

Department of Administration
Publication, Central Services Division
Documents Section
140 Centennial Office Building
St. Paul, Minnesota 55155
Telephone: (612) 296-2874

FILED
RICHARD L. BRUBACHER
Commissioner of Administration

JUN 2 1975 4:10 pm

BY Eda Staudenmaier
AUTH. SIGNATURE EJ

Stamped and filed with the Secretary of State 6-2-75

Rev. 9-72

STATE OF MINNESOTA

COUNTY OF RAMSEY

MINNESOTA ENERGY AGENCY

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In the matter of the Proposed
Adoption by the Minnesota Energy
Agency of Rules and Regulations
Governing Electric Utility
Information Reporting

ORDER FOR HEARING

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To effectively implement Minnesota Statutes 116H.08 (Minnesota Laws 1974, Chapter 307), the Minnesota Energy Agency deems it necessary to consider adoption of the proposed rules captioned above pursuant to the authority vested in the Agency by said Minnesota Statutes, Section 116H.08.

NOW, THEREFORE, IT IS ORDERED this 24th day of February, 1975, that a public hearing on the proposed rules captioned above shall be held in Room 730, Federal Building, U. S. Court House, 316 North Robert Street, Saint Paul, Minnesota, on March 31, 1975, commencing at 9:30 A.M., and continuing until all representatives of associations or other interested groups or persons have had an opportunity to be heard.

IT IS FURTHER ORDERED, that notice of said hearing be given to all representatives of associations or other interested groups or persons who have registered their names with the Secretary of State for that purpose and all persons who are presently members of the Minnesota Legislature.

MINNESOTA ENERGY AGENCY

By John C. McKay
John McKay
Director

STATE OF MINNESOTA

COUNTY OF RAMSEY

MINNESOTA ENERGY AGENCY

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In the matter of the Proposed Adoption by the Minnesota Energy Agency of Rules and Regulations Governing Electric Utility Information Reporting (EA 200 - EA 213)

NOTICE OF HEARING

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NOTICE IS HEREBY GIVEN that a public hearing will be held pursuant to Minnesota Statutes Section 15.0412 (1973) and Minnesota Statutes 116H.08 (Minnesota Laws 1974, Chapter 307), in the above-entitled matter, in Room 730, Federal Building, U. S. Court House, 316 North Robert Street, Saint Paul, Minnesota, on March 31, 1975, commencing at 9:30 A.M., and continuing until all representatives or other interested groups of persons have had an opportunity to be heard concerning adoption of the proposed rules captioned above by submitting either oral or written data, statements or arguments. Statements or briefs may be submitted in writing without appearing at the hearing by mailing to the Minnesota Energy Agency, Room 740, American Center Building, 160 East Kellogg Boulevard, Saint Paul, Minnesota 55101, at any time prior to closing of the record. The record shall close at 4:30 P.M. on April 21, 1975.

Copies of the proposed rules are now available and may be obtained by writing to the Minnesota Energy Agency at the address below. Additional copies will be available at the door on the date of the hearing.

These rules are proposed rules only and are subject to alterations or modifications as the Agency deems necessary and appropriate from its consideration of all the evidence adduced at the public hearing and all statements entered into the record.

Dated this 24 day of February, 1975.

MINNESOTA ENERGY AGENCY

By John C. McKay
John McKay, Director

Minnesota Energy Agency
740 American Center Building
160 East Kellogg Boulevard
Saint Paul, Minnesota 55101

Telephone: 612-296-5120
612-296-5124

AFFIDAVIT OF ACQUISITION
OF MAILING LIST

STATE OF MINNESOTA)
) SS
COUNTY OF RAMSEY)

In the matter of the Proposed
Adoption by the Minnesota
Energy Agency of Rules and Regulations
Governing Electric Utility Information Reporting.

DANIEL L. QUILLIN, being first duly sworn upon oath, deposes and says:

1. That he is a Research Analyst in the Minnesota Energy Agency for the State of Minnesota.

2. That on the 24th day of February, 1975, he went to the Secretary of State's office for the State of Minnesota and requested a current list of all representatives of associations or other interested groups or persons who had registered their names with the Secretary of State for the purpose of obtaining notices of public hearings relating to the promulgation of rules pursuant to Minnesota Statute 15.0412.

3. That on the 24th day of February, 1975, in response to the above request, the Secretary of State provided him with such a list, a copy of which is attached hereto and incorporated by reference.

Further affiant sayeth not.

Daniel Quillin

DANIEL L. QUILLIN

Subscribed and sworn to before me
This 24TH day of February, 1975.

Philip W. Getts

PHILIP W. GETTS
NOTARY PUBLIC - MINNESOTA
RAMSEY COUNTY
My Comm. Expires Aug. 13, 1980

STATE OF MINNESOTA)
) SS
COUNTY OF RAMSEY)

CERTIFICATE

In the matter of the Proposed
Adoption by the Minnesota
Energy Agency of Rules and Regulations
Governing Electric Utility Information Reporting.

I hereby certify that the attached 414 labels constitute the complete list of persons, associations, and other interested groups who as of 10:15 o'clock A.M., this 24th day of February, 1975, have requested pursuant to M. S. 1974, Stat. 15.0421, that their names be placed on file with the Secretary of State for the purpose of receiving notice of public hearing on proposed rules on the subject captioned above.

Joan Anderson Growe
JOAN GROWE
Secretary of State
State of Minnesota

BY Gail Dion

STATE OF MINNESOTA)
)
COUNTY OF RAMSEY)

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In the matter of the Proposed Adoption by the Minnesota Energy Agency of Rules and Regulations Governing Electric Utility Information Reporting (EA 200 - EA 213)

AFFIDAVIT OF MAILING

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Daniel L. Quillin, BEING FIRST DULY SWORN, deposes and says:

That on the 25th day of February, 1975, at the City of Saint Paul, County of Ramsey, State of Minnesota, he served the attached Notice of Hearing by depositing in the United States mail at said City of Saint Paul, a true and correct copy thereof, properly enveloped, with postage prepaid, to all persons and associations at the addresses listed on the attached Certificate of the Secretary of State.

Daniel L. Quillin

Subscribed and sworn to before me this 25th day of February, 1975.

Mildred G. Norling

Mildred G. Norling
Notary Public-Minnesota
Hennepin County
My Commission Expires
February 12, 1976

STATE OF MINNESOTA

COUNTY OF RAMSEY

MINNESOTA ENERGY AGENCY

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In the matter of the Proposed Adoption by the Minnesota Energy Agency of Rules and Regulations Governing Electric Utility Information Reporting (EA 200 - EA 213)

STATEMENT OF NEED

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The above captioned rules have been adopted by the Minnesota Energy Agency in partial fulfillment of its responsibilities under the provisions of Minn. Stat. § 116H.10 and 11 (1974). The Agency is charged by the statute with collecting forecasts of future energy supply and demand from various energy suppliers. This information is needed by the Agency to permit it to accurately assess Minnesota's energy future. The rules and regulations adopted herewith are designed to ensure that the necessary information is reported in a uniform, easily understood manner. The rules are also needed to ensure that all of the relevant information is presented by every supplier. Finally, in order to assess the validity of a particular forecast, it is necessary to know the assumptions which underly that forecast. For this reason, the rules are required to compel disclosure of the various forecasting assumptions and methodology employed by the suppliers.

Dated: May 23, 1975

MINNESOTA ENERGY AGENCY

by Philip W. Getts

Philip W. Getts
Deputy Director

STATE OF MINNESOTA

COUNTY OF RAMSEY

MINNESOTA ENERGY AGENCY

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In the matter of the proposed
Adoption by the Minnesota Energy
Agency of Rules and Regulations
Governing Electric Utility
Information Reporting

FINDINGS OF FACT

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The above-entitled matter came on for hearing before the Minnesota Energy Agency [herinafter the Agency] on the 31st day of March, 1975, at 9:30 a.m. in Courtroom 2, Federal Building, U.S. Court House, 316 N. Robert St., Saint Paul, Minnesota, after proper notice required by Minnesota Statute § 15.0412 (1974) was served upon all persons, associations and other interested groups registered with the Secretary of State for that purpose and upon all members of the Minnesota Legislature.

After affording all persons an opportunity to present written and oral data, statements and arguments, having considered all of the testimony, having considered all of the evidence adduced and upon the records, files and proceedings herein, the Agency finds the following:

1. Minn. Stat. § 116H.10 subd. 1 (1974) requires the Director of the Minnesota Energy Agency [hereinafter the Director] to develop and maintain an effective program of collection, compilation and analysis of energy statistics.

2. Minn. Stat. § 116H.10 subd. 2 (1974) requires each electric utility to submit annually to the Director a report in which the utility makes 5, 10, and 15-year forecasts of the projected demand for energy within its service area and the facilities necessary to meet the demand. Minn. Stat. § 116H.10 subd. 2 (1974) further authorizes the Director to specify what information shall be included in the report.

3. Minn. Stat. § 116H.11 subd. 1 (1974) requires the Director to make a biennial report to the governor and the legislature which is designed to identify emerging trends related to energy supply, demand, conservation, public health and safety factors, and to specify the level of statewide and geographic area energy needs. Much of the information required by EA 200-EA 213 is necessary in order to enable the Director to prepare such reports.

4. Some entities included within the statutory definition of electric utility do not generate electricity; they receive it from other utilities and distribute it to ultimate consumers.

5. If all the utilities from which such a "distribution only" utility receives electricity report to the Director, there is no need for the distribution only utility to make supply and facility forecasts, since the Agency will receive all the information which the distribution only utility would supply in the forecasts of the generating and transmission utilities which supply its electricity.

6. If all of the source generating and transmission utilities supplying a distribution only utility do not report to the Agency, the only effective means obtaining the information is to require the distribution only utility to make its own forecasts.

7. In order to make the forecasts of electric energy demand, production and consumption meaningful, and in order to enable the Agency to assess the accuracy of forecasts as required by Minn. Stat. § 116H.11, subd. 1(a) (1974), the forecasts must contain information regarding the anticipated level of consumption by ultimate consumers.

8. Information regarding purchase of electricity from other utilities, sales of electricity to other utilities, the amount of electricity generated, and the amount used by the generation plants or lost in transmission will enable the Agency to examine the relationship between a utility's production and consumption by its consumers and the supply relationships among utilities.

9. Information regarding peak demand and load factor will also assist the Agency in examining production-consumption relationships. Since demand and load factor differ during the summer and winter months, data for both seasons is necessary.

10. Data on consumption by county for the past calendar year and the present calendar year will enable the Agency to determine whether the growth rate of demand for electricity differs in different regions of a utility's service area. However, it is difficult to predict future growth rate by county. Use of Minnesota Environmental Quality Council regions for future consumption data provides a larger area about which forecasts can be made.

11. Historical data for the past calendar year and historical data or estimates for the present calendar year will assist the Agency in determining the rate of growth in demand for electricity which is expected to occur.

12. In making its 5, 10 and 15 year forecasts, the utility must state the assumptions on which the forecasts are based, the possible estimating error and probable deviations in order to enable the Agency to assess the accuracy of the forecasts.

13. Information regarding the plant capacity of utility generating facilities, the amount of electricity produced, the fuels used in generation and information regarding the generating equipment of each facility will enable the Agency to determine whether additions to existing facilities or new facilities will be necessary to supply projected electrical energy demand.

This information can be used as well in the certificate of need program (Minn. Stat. § 116H.13 (1974)).

14. Information regarding fuel requirements and generation by fuel type will assist the Agency in assessing the future use of various scarce energy resources.

15. Information regarding the location of present and planned large transmission lines will assist the Agency in evaluating the distribution system for electricity which a utility has planned.

16. A peak demand curve for the summer months and winter months will, if compiled over a period of years, enable the Agency to determine the growth of demand for electricity and give useful information about the type of demand.

17. Identification of large electric users will assist the Agency in developing conservation initiatives.

18. Information regarding fuel supply contracts will assist the Agency in evaluating the use of various scarce energy resources.

19. A map of the utility's service area will assist the Agency in evaluating the utility's production and distribution system.

20. Identification of utilities from which electricity is purchased or sold and descriptions of any interconnections between utilities will assist the Agency in examining supply relationships among electric utilities.

21. At some future date, the Agency may need quarterly reporting of some annually reported data.

22. Some uniform means of identification of the type of consumers served by each utility is necessary for the Agency to assess the accuracy of forecasts, to assist in operating the certificate of need program and to use in formulating energy use and substitution programs.

23. Standard Industrial Classification codes provide a familiar and uniform method of identifying types of consumers and can be easily utilized by most reporting utilities in the future.

24. Information on consumers using SIC codes is not available for the past and present years for most utilities.

25. FPC Report 12, Schedule 10, provides the best available historical information on types of consumers and can be used by the Agency during the initial reporting periods as a starting point in identifying types of consumers.

26. Effective operation of the certificate of need programs and other energy use substitution programs will require much of the same information now supplied to the Minnesota Environmental Council Quality for power plant siting forecasting.

27. Allowing utilities to submit such information in the same form for use by both the Agency and the MEQC will ease the burden of reporting for utilities.

28. Other information required by these regulations may also be required by other state or federal agencies, and if possible, utilities may be allowed to substitute those reports for reports required under these regulations if the information required is substantially the same.

Dated: May 23, 1975

MINNESOTA ENERGY AGENCY

by _____
Philip W. Getts
Deputy Director

STATE OF MINNESOTA

COUNTY OF RAMSEY

MINNESOTA ENERGY AGENCY

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In the matter of the Proposed Adoption by the Minnesota Energy Agency of Rules and Regulations Governing Electric Utility Information Reporting (EA 200 - EA 213)

ORDER ADOPTING RULES

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The above entitled matter came for hearing before the Minnesota Energy Agency on the 31st day of March, 1975, at 9:30 a.m., in Court Room 2, Federal Building, 316 North Robert Street, Saint Paul, Minnesota, after proper notice required by Minnesota Statute 15.0412 (1974) was served upon all persons, associations and other interested groups registered with the Secretary of State for that purpose.

After affording interested persons an opportunity to present written and oral data, statements and arguments, having heard all of the testimony, having considered all of the evidence adduced and upon the records, files and proceedings herein, and applicable statutory standards or criteria and having confirmed the need for the above captioned rules:

NOW, therefore, IT IS ORDERED that these rules identified as EA 200 - EA 213 are adopted this 23rd day of May, 1975, pursuant to the authority vested in the Agency by Minn. Stat. § 116H.08 (a) (1974).

MINNESOTA ENERGY AGENCY

by _____
Philip W. Getts
Deputy Director

STATE OF MINNESOTA

COUNTY OF RAMSEY

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MINNESOTA ENERGY AGENCY

In the matter of the Proposed Adoption By the Minnesota Energy Agency of Rules and Regulations Governing Electric Utility Information Reporting (EA 200-EA 213)

STATEMENT OF COMPLIANCE WITH MANUAL OF RULE MAKING PROCEDURES

I, Special Assistant Attorney General Joan Swartz, do hereby declare that I have examined the proposed rules and all related documents and that, based on them and my personal familiarity with the applicable procedures, the Manual of Rule Making Procedures has been followed. Any exceptions are noted below.

JOAN SWARTZ
Special Assistant
Attorney General

Dated: May 23, 1975.

In addition to the persons listed with the Secretary of State and all legislators, notice was also sent to all electric utilities operating within the State.

The hearing was held in Courtroom 2 of the Federal Courthouse, not Room 760 as indicated on the Notice of Hearing. However, there were signs at the Federal Courthouse directing people to Courtroom 2.

MINNESOTA ENERGY AGENCY

RULES AND REGULATIONS GOVERNING

ELECTRIC UTILITY INFORMATION REPORTING

EA 200 to EA 213

EA 200. PURPOSE.

The purpose of these rules is to implement the forecasting, statistical and informational reporting requirements of Minn. Stat. §§ 116H.10 and 11 (1974). These rules are adopted pursuant to the powers of the director conferred by Minn. Stat. § 116H.08, subd. a (1974), and are designed to identify emerging energy trends based on supply and demand, conservation and public health and safety factors and to determine the level of state-wide and service area energy needs.

EA 201. APPLICABILITY OF THESE RULES.

Each electric utility serving the State of Minnesota shall submit the information required by these rules to the director in the form specified by him.

EA 202. DEFINITIONS

For the purposes of these rules, the following definitions shall apply:

(a) "Agency" means the Minnesota Energy Agency;

(b) "Annual conversion efficiency" means the ratio of electrical energy produced by a power plant to the original fuel energy used to produce the electrical energy, expressed as a percentage;

(c) "Annual electrical consumption" means sales of kilowatt hours of electricity to ultimate consumers over a twelve-month period beginning January 1st and ending December 31st of the reporting year;

(d) "Annual Plant Efficiency" means the ratio of the electrical energy leaving a power plant to the fuel energy used to produce that amount of electrical energy, expressed as a percentage;

(e) "Director" means the director of the Minnesota Energy Agency;

(f) "Distribution only utility" means a utility which distributes electricity to ultimate consumers but which does not generate electricity.

(g) "Generating and transmission utility" means a utility which generates electricity and transmits it to other utilities or distributes it to ultimate consumers;

(h) "Last calendar year" means the calendar year immediately preceding the year in which reports are required to be filed;

(i) "Load factor" means the ratio of the average load in kilowatts supplied during a designated period to the maximum load in kilowatts which was supplied during that designated period;

(j) "Minnesota Service Area" means the geographical area within the State of Minnesota to which a utility supplies electrical energy;

(k) "Peak demand" means the highest kilowatt demand during a designated period recorded on a one hour integrated reading basis;

(l) "Summer months" means the period from May 1st through October 31st; "winter months" means the period from November 1st through April 30th;

(m) "Utility" means any entity engaged in the State of Minnesota in the generation, transmission or distribution of electrical energy, including but not limited to a private investor-owned utility or a public or municipally-owned utility.

EA 203. REGISTRATION.

Each electric utility serving the State of Minnesota on June 1, 1975, must file a registration statement with the director by July 1, 1975. Any electric utility which commences operations in the state after June 1, 1975, shall file a registration statement with the director within 30 days after commencing operation. Each registration statement shall be on forms issued by the director and shall contain the name and headquarter address of the utility, the type of utility, the names and addresses of all officers of the utility, and the name, address and telephone number of a person who may be contacted for information about the utility.

EA 204. REPORTING DATES.

(a) Except as provided by the director or as provided in EA 204(b) each generating and transmission utility shall file with the director the information required by EA 205, 206, 207, 208, 209 and 211 by July 1 of each year.

(b) Except as provided by the director, each distribution only utility shall file with the director only the information required by EA 205 and EA 209 by July 1 each year if all of its source generating and transmission utilities are required under these regulations to report to the director.

(c) Except as provided by the director each utility shall file with the director the information required by EA 210 on a quarterly basis as follows:

Information for the period of January 1 to March 31 shall be filed by April 30.

Information for the period of April 1 to June 30 shall be filed by July 31.

Information for the period of July 1 to September 30 shall be filed by October 31.

Information for the period of October 1 to December 31 shall be filed by January 31 of the following year. No changes shall be made in reporting dates set forth in this section unless each reporting utility which would be affected has been given written notice of such change 30 or more days before the effective date of such change.

EA 205. FEDERAL REPORTS FILED BY UTILITIES.

Each utility shall identify to the director all forms and reports which it regularly files with the Federal Power Commission, the Rural Electrification Administration, and other Federal agencies. Upon request of the director, each utility shall make copies of any such forms or reports available to the director.

EA 206. FORECASTS.

(a) Each utility shall submit annually to the director 5, 10 and 15 year forecasts of the peak demand and the consumption of electrical energy within its Minnesota service area.

(b) The energy forecasts shall contain the following data for each reporting year:

(i) Annual electrical consumption/production forecast.

(aa) Annual electrical consumption by ultimate consumers within the utility's Minnesota Service Area;

(bb) The number of kilowatt hours the utility has received or expects to receive from other systems for sale to its ultimate consumers or to other utilities;

(cc) The number of kilowatt hours the utility has delivered or expects to deliver to other systems for resale and the number of kilowatt hours the utility has delivered or expects to deliver to ultimate consumers outside its Minnesota Service Area;

(dd) Total annual production of electrical energy by the utility in kilowatt hours;

(ee) Annual inplant consumption of electrical energy in kilowatt hours;

(ff) Net generation as measured by total annual production (dd) less annual inplant consumption (ee);

(gg) System energy losses, which shall be calculated as follows:

ff + bb - cc - aa

(ii) Electrical demand forecast.

(aa) Peak demand data for the Minnesota Service Area during the summer months and during the winter months;

(bb) Load factor data for the Minnesota Service area during the summer months and during the winter months.

(c) Reporting years. The data required in 206(b) shall be supplied for the following years:

(i) the last calendar year;

(ii) the present calendar year;

(iii) the year 5 years after the present calendar year;

(iv) the year 10 years after the present calendar year;

(v) the year 15 years after the present calendar year.

In 1975, data shall also be supplied for the calendar year 1973.

(d) Forecast of consumption of electrical energy by region:

(i) For the reporting years 1973, the last calendar year and the present calendar year, the data required by EA 206(b)(i)(aa) shall also be reported by county;

(ii) For the reporting years 5 years after the current year, and 10 years after the current year, the data required by EA 206(b)(i)(aa) shall be forecasted for each of the regions which the utility uses in reporting to the Minnesota Environmental Quality Council under MEQC 71-75.

(e) For the last calendar year and for the year 1973, historical data shall be supplied. If recorded figures are not available, estimates shall be used and shall be identified as such. For each other reporting year, a forecast shall be made using the utility's best estimate of electrical energy growth . The best estimate of electrical energy growth shall be based on the factors which the reporting utility deems most likely to occur in its Minnesota Service Area. The data for each reporting year shall be calculated by applying these factors to the data for the last calendar year for which actual data listed in 206(b) is available. The assumptions and factors used in arriving at the best estimate forecast shall be stated in writing. Each utility shall evaluate the size of the estimating error, given the conditions and factors used in the estimate. Each utility shall comment on probable deviations from the best estimate projection.

EA 207. FACILITY REQUIREMENTS.

(a) Present facilities. Each utility required to report under EA 204(a) shall provide the following information with regard to each power plant serving or capable of serving its Minnesota Service Area as of January 1 of the current year:

(i) the name of the plant;

(ii) the year constructed;

(iii) its location and address;

(iv) the primary fuel which is currently used to operate the plant;

(v) the secondary fuels which are currently used to operate the plant;

(vi) name plate plant capacity as measured by the sum total of the maximum name plate rating of each unit of generating equipment in the plant;

(vii) actual plant capacity as measured by the maximum load that could be supplied by present equipment on a continuous basis and on a peaking basis of which the utility shall specify duration;

(viii) the total number of kilowatt hours generated by the plant for non-plant use during the last calendar year;

(ix) the annual conversion efficiency of the plant;

(x) the quantities of primary and secondary fuels consumed during the last calendar year;

(xi) the year in which the plant or each unit of a multi-unit plant began operation;

(xii) the name plate number, kilowatt rating, power factor, voltage, phase and frequency for each unit of generating equipment in the plant.

(b) Future facility requirements. Each utility required to report under EA 204(a) shall estimate the additional power plants or additions to existing plants necessary to provide for the energy growth predicted for the best estimate forecast projected in EA 206(d). Each utility shall supply the following information about each additional plant or addition:

(i) the proposed general location of each plant currently in the planning stage, or the actual location of each plant currently under construction;

(ii) the year in which construction began or is predicted to begin;

(iii) the month and year in which the plant is predicted to begin operation;

(iv) estimated cost of the new facility at the time of construction;

(v) the estimated plant capacity of anticipated generating equipment;

(vi) the estimated total annual net kilowatt-hours generated for non-plant use by the plant operating at full capacity;

(vii) the primary fuel to be used to operate the plant;

(viii) the secondary fuels to be used to operate the plant;

(ix) the estimated annual conversion efficiency of the plant;

(x) the estimated amounts of primary and secondary fuels required annually to operate the plant at its projected production rate.

(c) Fuel requirements and generation by fuel type.

(i) Based on the data reported under EA 207(a) and (b) each utility required to report under EA 204(a) shall report the quantity of coal, natural gas, middle distillates, heavy oils, nuclear energy, and any other fuels used by its power plants serving its Minnesota Service Area during the last calendar year, and the kilowatt hours of electrical energy generated for sale to ultimate consumers by each type of fuel. If data is reported for other fuels, the type of fuel shall be specified.

(ii) Each utility shall estimate the quantities of the fuels listed in 207(c)(i) which will be necessary for use by its power plants serving its Minnesota Service Area in order to provide for the electrical energy growth predicted by the best estimate forecast projected in EA 206(b). Each utility shall also estimate by fuel type the kilowatt hours of electricity which will be produced by its power plants serving its Minnesota Service Area under the best estimate forecast. In preparing such estimates, each utility shall consider increases in fuel use by existing facilities and possible conversions between fuel types.

In 1975 the utility shall also report information for the 1973 calendar year.

EA 208. TRANSMISSION LINES.

(a) Present transmission lines. Each utility required to report under EA 204(a) shall report the number of miles of transmission lines 100 kilovolts and over by voltage in use on December 31 of the last calendar year.

(b) Future transmission lines. Each utility required to report under EA 204(a) shall estimate the number of miles of transmission lines 100 kilovolts and over by voltage which will be necessary to provide distribution capability for those plants currently in the planning stage or under construction and the number of miles of other planned transmission lines 100 kilovolts and over.

EA 209. OTHER INFORMATION REPORTED ANNUALLY.

Each utility shall provide the following information for the last calendar year:

(a) A table and a graphed curve of the demand in kilowatts by hour over a 24-hour period for:

(i) the 24-hour period during the summer months when the kilowatt demand on the system was the greatest;

(ii) the 24-hour period during the winter months when the kilowatt demand on the system was the greatest.

(b) The names and addresses of, and the kilowatt hours of electricity consumed by, the 25 largest customers of the utility;

(c) The names and addresses of the fuel suppliers with whom the utility has contracts, the type of fuel and the duration of the contract in the following categories:

(i) firm contracts

(ii) interruptible contracts

(iii) standby contracts;

(d) The names of any utilities with whom the reporting utility has contracted to purchase or sell electricity and a brief description of the terms of any such contract;

(e) A detailed map, on which the scale is indicated, of the utility's Minnesota Service Area, identifying power plants, principal sub-stations, and transmission lines over 100 kilovolts, identified by voltage;

(f) A listing of the inter-connections the utility has with other utilities including:

(i) the names of any such system

(ii) the voltage rating of the inter-connection

(iii) the kilowatt hours received or delivered over the connection during the last year.

The director may require that utilities report any of the data required by this rule on a quarterly basis upon 30 days notice to all reporting utilities.

EA 210. ENERGY DELIVERED TO ULTIMATE CONSUMERS.

(a) Beginning in the year 1976 each utility shall report quarterly the kilowatt hours delivered each month during the preceding quarter to ultimate consumers, broken down by customer class/geographic area combination.

(i) geographic areas will be defined by the customer's zip code;

(ii) customer class will be defined by standard industrial classification (SIC) codes with extensions for more detailed break-down of households and governmental units;

(iii) in each customer class/geographic area combination the utility shall report the number of customers and the total kilowatt hours consumed;

Said information shall be in the form determined by the director. Upon written application, the director may allow a utility to report said information in a different form.

(b) The director may, after an evaluation of the data availability, level of automation and homogeneity of accounts of any utility, require said utility to report the information required by this section for the 3rd and 4th quarters of 1975. Third quarter

statistics for such utilities shall be filed by October 31, 1975. No utility shall be required to report in 1975 unless it has been notified in writing by the director of its obligation 30 or more days prior to the reporting date.

(c) During the year 1975 FPC Report No. 12, Schedule 10 or its equivalent shall provide the basis for reporting the energy delivered to ultimate consumers by categories as follows:

(i) farm, excluding irrigation and drainage pumping. For reporting purposes, any tract of land used primarily for agricultural purposes is considered farm land. Land operated by each tenant, cropper or manager shall be reported as a separate farm. Reports shall list number of farms rather than farm dwellings served;

(ii) irrigation and drainage pumping;

(iii) non-farm residential. When electricity is supplied through a single meter for both residential and commercial uses, it shall be reported according to its principal use. Apartment buildings shall be reported as residential even if not separately metered;

(iv) commercial. This category shall include wholesale and retail trade; communication industries; banks, insurance, real estate and rental agencies; hotels and motels; personal business and auto repair services; medical and educational facilities; recreational and amusement facilities; governmental units excluding military bases; electric, gas, water and other utilities;

(v) industrial. This category shall include all mining and manufacturing industries, construction operations and petroleum refineries.

(vi) street and highway lighting;

(vii) electrified transportation. This category shall include energy supplied for the propulsion of vehicles, but shall not include energy supplies for office buildings, depots, signal lights or other associated facilities which shall be reported as commercial or industrial;

(viii) other. This category shall include municipal water pumping facilities, oil and gas pipeline pumping facilities, military camps and bases, and all other consumers not reported in categories (i) through (vii).

Each utility shall explain in writing any significant deviation in its customer assignments which would affect the delivery figures reported under this section.

(d) In 1975 a utility which files FPC Report 12, Schedule 10, or its equivalent, and whose service area is wholly within Minnesota, shall submit copies of FPC Report 12, Schedule 10, for the years 1965 to 1974 to the director by July 1, 1975. Data for 1975 sales based on FPC Report 12, Schedule 10, shall be reported to the agency within 10 days after it is submitted to the Federal Power Commission.

(e) A utility which files FPC Report 12, Schedule 10, or its equivalent, and whose service area is not wholly within Minnesota, or a utility which does not file FPC Report 12, Schedule 10, or its equivalent, shall submit actual data or estimates if data is not available based on the Schedule 10 categories for the years 1965 to 1974 to the director by July 1, 1975.

EA 211. ADVANCE FORECASTING FOR POWER PLANT SITING.

This rule requires reporting of the same information required by the Minnesota Environmental Quality Council for advance forecasting for power plant siting under MEQC 74. It is intended that each utility may submit a single document which will cover the needs of both the MEQC and the Agency. Each reporting utility shall submit three (3) copies of the document to the director.

Each utility required to report under EA 204(a) shall provide the following information concerning its facilities:

(a) Identification of the location, generating capacity (over one megawatt), type, and fuel of all existing electric power generating plants and of the location, transmission capacity, and type of all existing transmission lines designed to operate at a nominal voltage of 100 kilovolts or more intended to be removed from service within 20 years from the current year; description of land use plans for the sites and routes involved;

(b) Identification of the location, generating capacity (over one megawatt), type, and fuel of all electric power generating plants and of the location, transmission capacity, and type of all transmission lines designed to operate at a nominal voltage of 100 kilovolts or more removed from service in the preceding five-year period; statement of the disposition of the sites and routes involved (real property and easements);

(c) Description of the tentative regional location, generating capacity, type, land and water areas involved, anticipated maximum water demand (maximum rate and yearly volume), and source of water for all new LEPGP's and the tentative regional location, transmission

capacity, and type of all new HVTL's to be constructed, owned, or operated by the utility within 15 years from the current year;

(d) Description of the current transmission grid and of the forecasted grid together with the reasons for changing the capacity and reliability of the grid;

(e) Description of the utility's relationship to other utilities and regional association, power pools or networks.

The ability of the MEQC to require information other than that listed above is not limited or abrogated by the inclusion of this section in the rules and regulations of the Agency.

EA 212. CORRECTIONS.

Substantial corrections of any report or statement must be filed with the agency within 10 days following the date of the event prompting the change in reported information or the date upon which the person filing became aware of the inaccuracy. The change or correction shall identify the form and the paragraph of the information to be changed or corrected.

EA 213. FEDERAL OR STATE DATA SUBSTITUTION FOR ENERGY AGENCY DATA REQUIREMENTS.

The director may, upon written request, allow any utility to substitute data provided to the federal government or another state agency in lieu of data required by these regulations if the data required by both agencies is substantially the same.

APPROVED AS TO FORM AND LEGALITY
JUN 2 1975 19
WARREN SPANNAUS, ATTORNEY GENERAL
BY /s/ Michael B. Miller
SPECIAL ASSISTANT ATTORNEY GENERAL

STATE OF MINNESOTA
DEPARTMENT OF STATE
FILED
JUN 2 - 1975 4:00 pm
Joan Anderson Growe
Secretary of State

FILED
RICHARD L. BRUBACHER
Commissioner of Administration
JUN 2 1975 4:10 pm
BY Eda Staudenmaier EJ
AUTH. SIGNATURE

MINNESOTA ENERGY AGENCY

PROPOSED RULES AND REGULATIONS GOVERNING

ELECTRIC UTILITY INFORMATION REPORTING

EA 200 to EA 213

EA 200. PURPOSE.

The purpose of these rules is to implement the forecasting, statistical and informational reporting requirements of Minn. Stat. §§ 116H.10 and 11 (1974). These rules are adopted pursuant to the powers of the director conferred by Minn. Stat. § 116H.08, subd. a (1974), and are designed to identify emerging energy trends based on supply and demand, conservation and public health and safety factors and to determine the level of state-wide and service area energy needs.

EA 201. APPLICABILITY OF THESE RULES.

Each electric utility serving ultimate consumers in the State of Minnesota shall submit the information required by these rules to the director in the form specified by him.

EA 202. DEFINITIONS

For the purposes of these rules, the following definitions shall apply:

(a) "Agency" means the Minnesota Energy Agency;

(b) "Annual conversion efficiency" means the ratio of electrical energy produced by a power plant to the original fuel energy used to produce the electrical energy, expressed as a percentage;

(c) "Annual electrical consumption" means sales of kilowatt hours of electricity to ultimate consumers over a twelve-month period beginning January 1st and ending December 31st of the reporting year;

(d) "Annual Plant Efficiency" means the ratio of the electrical energy leaving a power plant to the fuel energy used to produce that amount of electrical energy, expressed as a percentage;

(e) "Annual System Efficiency" means the ratio of electric energy delivered to ultimate customers less electricity purchased from other sources to the original fuel energy used to produce the electrical energy, expressed as a percentage;

(f) "Annual Transmission Efficiency" means the ratio of the number of kilowatt hours delivered to ultimate consumers less electricity purchased from other sources to the number of kilowatt hours leaving a power plant, expressed as a percentage;

(g) "Director" means the director of the Minnesota Energy Agency;

(h) "Last calendar year" means the calendar year immediately preceding the year in which reports are required to be filed;

(i) "Load factor" means the ratio of the average load in kilowatts supplied during a designated period to the maximum load in kilowatts that was supplied during that designated period;

(j) "Minnesota Service Area" means the geographical area within the State of Minnesota where a utility actually serves ultimate electrical energy consumers;

(k) "Peak demand" means the highest kilowatt demand during a designated period recorded on a one hour integrated reading basis;

(l) "Summer months" means the period from April 1st through October 31st; "winter months" means the period from November 1st through March 31st;

(m) "Utility" means any entity engaged in the State of Minnesota in the generation, transmission or distribution of electrical energy, including but not limited to a private investor-owned utility or a public or municipally-owned utility.

EA 203. REGISTRATION.

Each electric utility serving ultimate consumers in the State of Minnesota on June 1, 1975, must file a registration statement with the director by July 1, 1975. Any electric utility which commences operations in the state after June 1, 1975, shall file a registration statement with the director within 30 days after commencing operation. Each registration statement shall be on forms issued by the director and shall contain the name and headquarter address of the utility, the type of utility, the names and addresses of all officers of the utility,and the name, address and telephone number of a person who may be contacted for information about the utility.

EA 204. REPORTING DATES.

Except as provided by the director, each utility shall file with the director the information required by EA 205, 206, 207, 208, 209 and 211 by July 1 of each reporting year. Except as provided by the director each utility shall file with the director the information required by EA 210 on a quarterly basis as follows:

Information for the period of January 1 to March 31 shall be filed by April 30.

Information for the period of April 1 to June 30 shall be filed by July 31.

Information for the period of July 1 to September 30 shall be filed by October 31.

Information for the period of October 1 to December 31 shall be filed by January 31 of the following year. No changes shall be made in reporting dates set forth in this section unless each reporting utility has been given written notice of such change 30 or more days before the effective date of such change.

EA 205. FEDERAL REPORTS FILED BY UTILITIES.

Each utility shall identify to the director all forms and reports which it files with the Federal Power Commission, the Rural Electrification Administration, and other Federal agencies. Upon request of the director, each utility shall make copies of any such forms or reports available to the director.

EA 206. FORECASTS.

(a) Each utility shall submit annually to the director 5, 10 and 20 year forecasts of the peak demand and the consumption of electrical energy within its Minnesota service area.

(b) The energy forecasts shall contain the following data for each reporting year:

(i) Annual electrical consumption/production forecast.

(aa) Annual electrical consumption by ultimate consumers for each county within the utility's Minnesota Service Area and for the total Minnesota Service Area;

(bb) The number of kilowatt hours the utility has received or expects to receive from other systems for sale within its Minnesota Service Area;

(cc) The number of kilowatt hours the utility has delivered or expects to deliver to other systems for resale and the number of kilowatt hours the utility has delivered or expects to deliver to ultimate consumers outside the Minnesota Service Area;

(dd) Total annual production of electrical energy by the utility in kilowatt hours;

(ee) Annual inplant consumption of electrical energy in kilowatt hours;

(ff) Net generation as measured by total annual production (dd) less annual inplant consumption (ee);

(gg) System energy losses, which shall be calculated as follows:

ff + bb - cc - aa

(ii) Electrical demand forecast.

(aa) Peak demand data for the Minnesota Service Area during the summer months and during the winter months;

(bb) Load factor data for the Minnesota Service area during the summer months and during the winter months.

(c) Reporting years. The data required in 206(b) shall be supplied for the following years:

(i) the last calendar year;

(ii) the present calendar year;

(iii) the year 5 years after the present calendar year;

(iv) the year 10 years after the present calendar year;

(v) the year 20 years after the present calendar year.

In 1975, data shall also be supplied for the calendar year 1973.

(d) For the last calendar year and for the year 1973, historical data shall be supplied. If recorded figures are not available, estimates shall be used and shall be identified as such. For each other reporting year, a forecast shall be made using the utility's best estimate of electrical energy growth. The best estimate of electrical energy growth shall be based on the factors which the reporting utility deems most likely to occur in its Minnesota Service Area. The data for each reporting year shall be calculated by applying these factors to the data for the last calendar year for which actual data listed in 206(b) is available. The assumptions and factors used in arriving at the best estimate forecast shall be stated in writing. Each utility shall evaluate the size of the estimating error, given the conditions and factors used in the estimate. Each utility shall comment on probable deviations from the best estimate projection.

EA 207. FACILITY REQUIREMENTS.

(a) Present facilities. Each utility shall provide the following information with regard to each power plant serving or capable of serving its Minnesota Service Area as of January 1 of the current year:

(i) the name of the plant;

(ii) the year constructed;

(iii) its location and address;

(iv) the primary fuel which is currently used to operate the plant;

(v) the secondary fuels which are currently used to operate the plant;

(vi) name plate plant capacity as measured by the sum total of the maximum name plate rating of each unit of generating equipment in the plant;

(vii) actual plant capacity as measured by the maximum load that could be supplied by present equipment on a continuous basis and on a peaking basis for which the utility shall specify duration;

(viii) the total number of kilowatt hours generated by the plant for non-plant use during the last calendar year;

(ix) the annual conversion efficiency of the plant;

(x) the quantities of primary and secondary fuels consumed during the last calendar year;

(xi) the year in which the plant began operation;

(xiii) the name plate number, kilowatt rating, power factor, voltage, phase and frequency for each unit of generating equipment in the plant.

(b) Future facility requirements. Each utility shall estimate the additional power plants or additions to existing plants necessary to provide for the energy growth predicted for the best estimate forecast projected in EA 206(d). Each utility shall supply the following information about each additional plant or addition:

(i) the proposed general location;

(ii) the year in which construction is predicted to begin;

(iii) the month and year in which the plant is predicted to begin operation;

(iv) estimated cost of the new facility at the time of construction;

(v) the estimated plant capacity of anticipated generating equipment;

(vi) the estimated total annual net kilowatt-hours generated for non-plant use by the plant operating at full capacity;

(vii) the primary fuel to be used to operate the plant;

(viii) the secondary fuels to be used to operate the plant;

(ix) the estimated annual conversion efficiency of the plant;

(x) the estimated amounts of primary and secondary fuels required annually to operate the plant at its projected production rate.

(c) Fuel requirements and generation by fuel type.

(i) Based on the data reported under EA 207(a) and (b) each utility shall report the quantity of coal, natural gas, middle distillates, heavy o oils, nuclear fuels, and any other fuels used by its power plants serving its Minnesota Service Area during the last calendar year, and the kilowatt hours of electrical energy generated for sale to ultimate consumers by each type of fuel. If data is reported for other fuels, the type of fuel shall be specified.

(ii) Each utility shall estimate the quantities of the fuels listed in 207(c)(i) which will be necessary for use by its power plants serving its Minnesota Service Area in order to provide for the electrical energy growth predicted by the best estimate

forecast projected in EA 206(d). Each utility shall also estimate by fuel type the kilowatt hours of electricity which will be produced by its power plants serving its Minnesota Service Area under the best estimate forecast. In preparing such estimates, each utility shall consider increases in fuel use by existing facilities and possible conversions between fuel types.

In 1975 the utility shall also report information for the 1973 calendar year.

EA 208. TRANSMISSION LINES.

(a) Present transmission lines. Each utility shall report the number of miles of transmission lines 22 kilovolts and over by voltage in use on December 31 of the last calendar year.

(b) Future transmission lines. Each utility shall estimate the number of miles of transmission lines 22 kilovolts and over by voltage which will be necessary to provide for the energy growth predicted by the best estimate forecast projected in EA 206(d).

EA 209. OTHER INFORMATION REPORTED ANNUALLY.

Each utility shall provide the following information for the last calendar year:

(a) A table and a graphed curve of the demand in kilowatts by hour over a 24 hour period for:

(i) the 24-hour period during the summer months when the kilowatt demand on the system was the greatest;

(ii) the 24-hour period during the winter months when the kilowatt demand on the system was the greatest.

(b) The names and addresses of, and the kilowatt hours of electricity consumed by, the 25 largest customers of the utility;

(c) The names and addresses of the fuel suppliers with whom the utility has contracts, the type of fuel and the duration of the contract in the following categories:

(i) firm contracts

(ii) interruptible contracts

(iii) standby contracts;

(d) The names of any utilities with whom the reporting utility has contracted to purchase or sell electricity and a brief description of the terms of any such contract;

(e) A detailed map, on which the scale is indicated, of the utility's Minnesota Service Area, identifying power plants, principal sub-stations, and transmission lines over 22 kilovolts, identified by voltage;

(f) A listing of the connections the utilities has with other utilities including:

(i) the names of any such system

(ii) the capacity in kilovolt amperes of the inter-connection

(iii) peak kilowatt demand and kilowatt hours received or delivered over the connection during the last year.

The director may require that utilities report any of the data required by this rule on a quarterly basis upon 30 days notice to all reporting utilities.

EA 210. ENERGY DELIVERED TO ULTIMATE CONSUMERS.

(a) Beginning in the year 1976 each utility shall report quarterly the kilowatt hours delivered to ultimate consumers, broken down by customer class/geographic area combination.

(i) geographic areas will be defined by the customer's zip code;

(ii) customer class will be defined by standard industrial classification (SIC) codes with extensions for more detailed break-down of households and governmental units;

(iii) in each customer class/geographic area combination the utility will report the number of customers and the total kilowatt hours consumed;

Said information shall be in the form determined by the director. Upon written application, the director may allow a utility to report said information in a different form.

(b) The director may, after an evaluation of the data availability, level of automation and homogeneity of accounts of utility, require said utility to report the information required by this section for the 3rd and 4th quarters of 1975. Third quarter statistics for such utilities shall be filed by October 31, 1975. No utility shall be required to report in 1975 unless it has been notified in writing by the director of its obligation 30 or more days prior to the reporting date.

(c) During the year 1975 FPC Report No. 12, Schedule 10 or its equivalent shall provide the basis for reporting the energy delivered to ultimate consumers by categories as follows:

(i) farm, excluding irrigation and drainage pumping. For reporting purposes, any tract of land used primarily for agricultural purposes is considered farm land. Land operated by each tenant, cropper or

manager shall be reported as a separate farm. Reports shall list number of farms rather than farm dwellings served;

(ii) irrigation and drainage pumping;

(iii) non-farm residential. When electricity is supplied through a single meter for both residential and commercial uses, it shall be reported according to its principal use. Apartment buildings shall be reported as residential even if not separately metered;

(iv) commercial. This category shall include wholesale and retail trade; communication industries; banks, insurance, real estate and rental agencies; hotels and motels; personal business and auto repair services; medical and educational facilities; recreational and amusement facilities; governmental units excluding military bases; electric, gas, water and water pumping and other utilities;

(v) industrial. This category shall include all mining and manufacturing industries, construction operations and petroleum refineries.

(vi) street and highway lighting;

(vii) electrified transportation. This category shall include energy supplied for the propulsion of vehicles, but shall not include energy supplied for office buildings, depots, signal lights or other associated facilities which shall be reported as commercial or industrial;

(viii) other. This category shall include municipal water pumping facilities, oil and gas pipeline pumping facilities, military camps and bases, and all other consumers not reported in categories (i) through (vii).

Each utility shall explain in writing any significant deviation in its customer assignments which would affect the delivery figures reported under this section.

(d) In 1975 a utility which files FPC Report 12, Schedule 10, or its equivalant, and whose service area is wholly within Minnesota, shall submit copies of FPC Report 12, Schedule 10, for the years 1965 to 1974 to the director by July 1, 1975. Data for 1975 sales based on FPC Report 12, Schedule 10, shall be reported to the agency within 10 days after it is submitted to the Federal Power Commission.

(e) A utility which files FPC Report 12, Schedule 10, or its equivalent, and whose service area is not wholly within Minnesota, or a utility which does not file FPC Report 12, Schedule 10, or its equivalent, shall submit actual data or estimates if data is not available based on the Schedule 10 categories for the years 1965 to 1974 to the director by July 1, 1975.

EA 211. ADVANCE FORECASTING FOR POWER PLANT SITING.

Each utility shall provide the following information concerning its facilities:

(a) Identification of the location, generating capacity (over one megawatt), type, and fuel of all existing electric power generating plants and of the location, transmission capacity, and type of all existing transmission lines designed to operate at a nominal voltage of 100 kilovolts or more intended to be removed from service within 20 years from the current year; description of land use plans for the sites and routes involved;

(b) Identification of the location, generating capacity (over one megawatt), type, and fuel of all electric power generating plants and of the location, transmission capacity, and type of all transmission lines designed to operate at a nominal voltage of 100 kilovolts or more removed from service in the preceding five-year period; statement of the disposition of the sites and routes involved (real property and easements);

(c) Description of the tentative regional location, generating capacity, type, fuel, land and water areas involved, anticipated maximum water demand (maximum rate and yearly volume), and source of water for all new LEPGP's and the tentative regional location, transmission capacity, and type of all new HVTL's to be constructed, owned, or operated by the utility within 20 years from the current year;

(d) Description of the current transmission grid and of the forecasted grid together with the reasons for changing the capacity and reliability of the grid;

(e) Description of the utility's relationship to other utilities and regional association, power pools or networks.

EA 212. CORRECTIONS.

Corrections of any report or statement must be filed with the agency within 10 days following the date of the event prompting the change in reported information or the date upon which the person filing became aware of the inaccuracy. The change or correction shall identify the form and the paragraph of the information to be changed or corrected.

EA 213. FEDERAL OR STATE DATA SUBSTITUTION FOR ENERGY AGENCY DATA REQUIREMENTS.

The director may, upon written request, allow any utility to substitute data provided to the federal government or another state agency in lieu of data required by these regulations if the data required by both agencies is substantially the same.

MEA hearing 3/31/75

Carlson - Interst. Power Co - Dubuque, Iowa . . .
- op. in 3 states w/ only 15% sold in Minn.
- form ambig.

why both? EA206 - consumption by county basis then later by zip code.
either form not available

Interstate supplies power to Minn. customers from wherever its available, so not meaningful for only Minn. cause may come from any plant.
MAP purchases energy from as far away as Oklahoma.

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q. - if Minn. peaks in winter but IPC can pick it up & service from Iowa stuff (Iowa summer peak), will we pick that up?

LeVander - Minn. Assoc. of Elec. Co-ops
MAEC files reports w/ FPC, although FPC hasn't taken official juris. over them.
- substitute data if filed w/ other agencies

→ - deadlines coordination

gat coops sell to distributor coops
distr. coops own gat coops;
202(j) - Minn. Serv. Area defined to apply only to distr. coops (but 202 util. defined to include gat's)
distr. coops don't have much of info. requested.
will submit technical defs. for 202c-f

would all rep. req. be applicable to them? how to exempt?

what's overlap?

coop gets power from investor-owned; all others get only from ~~dist~~ its might be some customer overlap over stilines

MAP - Midcont Area Pool billing area is billed 20th to 20th; problem of reporting annual information; either change dates or allow estimates
MAP summer months May 1st to Oct 31
winter Nov 1 to April 30

says coops need 60 not 30 days for quarterly reports.
Fed forms - some coops filed spec. reports once only; asks amend. to "regularly"
206(b) - use coop service areas, not county.
207 - much of info. is supplied to MEQC
208 - says 22kv too low; PSC uses 25kv;?
LeV asks 115 or at least 69
209e - last ID 60-90 days notice
210 SIC code not used(?); coops file REA customer classification - much like that used by FPC; REA form 7 filed monthly - can that be substituted.
REA 7 is different (dist. coops file 12-4 not 12-10); farm not disting. from rural residential
212 - "major or substantial nature"

where does rural res. fit? under farm? or resid.?