


# Minnesota Attorney General: Administrative Rules Proceedings

## Copyright Notice:

This material may be protected by copyright law (U.S. Code, Title 17). Researchers are liable for any infringement. For more information, visit www.mnhs.org/copyright.

Version 3
August 20, 2018

313

Dwight S. Wagenius
Special Assistant
Attorney General

April 28, 1977

- Minnesota Energy Agency Governing Electric Utility Information Reporting, Minn. Regs. EA 201-213

MINNESOTA ENERGY AGENCY
740 American Center Building
160 East Kellogg Boulevard
St. Paul, Minnesota 55101
612-296-5120

April 8, 1977

Michael B. Miller
Special Assistant
Attorney General
Department of Administration
G-19-K State Administration
Building
50 Sherburne Avenue
Saint Paul, Minnesota 55155

Re: In the Matter of the Proposed Adoption of Amended Rules of the Minnesota Energy Agency Governing Electric Utility Information Reporting, Minn. Regs. EA 201-213

Dear Mr. Miller:

Enclosed pursuant to Minn. Stat. § 15.0412 subd. 4 (1976) and Minn. Regs. Atty Gen 301 et seq. is the entire record of the above-captioned proceeding.

Sincerely,

DWIGHT S. WAGENIUS
Special Assistant
Attorney General

DSW:sc
Enc.

MINNESOTA ENERGY AGENCY

RULES AND REGULATIONS GOVERNING

ELECTRIC UTILITY INFORMATION REPORTING

EA 201 to EA 213

EA 201 PURPOSE AND APPLICABILITY OF THESE RULES

A. 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 (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 statewide and service area energy needs.

B. 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 purposes of these rules, the following definitions shall apply:

A. "Adjusted Net Demand" means system demand, minus firm purchases, plus firm sales;

B. "Agency" means the Minnesota Energy Agency;

C. "Annual Adjusted Net Demand" means annual system demand, minus firm purchases, plus firm sales;

D. "Annual Electrical Consumption" means sales of kilowatt-hours of electricity to ultimate consumers over a twelve-month period beginning January 1 and ending December 31 of the reporting year;

E. "Annual System Demand" means the highest system demand occurring during the twelve-month period beginning May 1 of the forecast year;

F. "Director" means the director of the Minnesota Energy Agency;

G. "Distribution Only Utility" means a utility which distributes electricity to ultimate consumers but which does not generate electricity except on a standby emergency basis. Such emergency power shall not consist of more than five percent of total kilowatt-hours sales to ultimate consumers;

H. "Firm Purchases" and "Firm Sales" means the amount of power to be purchased or sold and intended to have assured availability;

I. "Generating and Transmission Utility" means any utility which generates in excess of five percent of its total kilowatt-hour sales to other utilities or its own ultimate consumers;

J. "Heat Rate" is the measure of thermal efficiency of a generating station or plant expressed in BTU's per net kilowatt-hour and computed by dividing the total BTU content of fuel burned for electric generation by the resulting net kilowatt-hour generation;

K. "Large Electric Generating Facility (LEGF)" means any electric power generating plant or combination of plants at a single site and associated facilities designed for or capable of operation at a combined capacity of 50,000 kilowatts or more, including, but not limited to, fossil fuel, nuclear fuel, pumped storage and hydroelectric plants;

L. "Large High Voltage Transmission Line (LHVTL)" means a conductor of electrical energy and associated facilities designed for and capable of operation at a nominal voltage of 200 kilovolts or more having more than 160 kilometres (100 miles) of its length in Minnesota. Associated facilities shall include, but not be limited to, insulators, towers, and substations and terminals operating at a nominal voltage of 200 kilovolts or more;

M. "Last Calendar Year" means the calendar year immediately preceding the year in which reports are required to be filed;

N. "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;

O. "Minnesota Service Area" means that portion of a utility's system lying within Minnesota;

P. "Net Generating Capacity" means the total amount of kilowatts, less station use, that all the generating facilities of a system could supply at the time of its maximum system demand, including the capacity of the generating units which are temporarily out of service for maintenance or repair;

Q. "Net Reserve Capacity Obligation" means the annual adjusted net demand multiplied by the percent reserve capacity requirement;

R. "Participation Power" means power and energy which are sold from a specific generating unit or units for a period of six or more months on a continuously available basis (except when such unit or units are temporarily out of service for maintenance during which time the delivery of energy from other generating units is at the seller's option);

S. "Participation Purchases" and "Participation Sales" means purchases and sales under a participation power agreement or a seasonal participation power agreement;

T. "Peak Demand" means the highest kilowatt demand during a designated period recorded on a one-hour integrated reading basis;

U. "Seasonal Adjusted Net Demand" means seasonal system demand, minus firm purchases, plus firm sales;

V. "Seasonal Participation Power" means participation power sold and bought on a seasonal (summer or winter) basis;

W. "Seasonal System Demand" means the maximum system demand on the applicant's system which occurs or is expected to occur in any normal summer season or winter season;

X. "Summer Season" means the period from May 1 through October 31;

Y. "System" means that combination of generating, transmission, and distribution facilities which make up the operating physical plant of the utility, whether owned or nonowned, for the delivery of electrical energy to ultimate consumers and includes

the geographic area where the utility's ultimate consumers are located;

Z. "System Demand" means the number of kilowatts which is equal to the kilowatt-hours required in any clock hour, attributable to energy required by the system during such hour for supply of firm energy to ultimate consumers, including system losses, and also including any transmission losses occurring on other systems and supplied by the system for transmission of firm energy, but excluding generating station uses and excluding transmission losses charged to another system;

AA. "Ultimate Consumers" means consumers purchasing electricity for their use and not for resale;

BB. "Utility" means any entity engaged 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; and

CC. "Winter Season" means the period from November 1 through April 30.

EA 203 REGISTRATION

Any electric utility which commences operations in the state 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. Annual

1. Except as provided by the director, each generating and transmission utility shall file with the director the information required by rules EA 205, 206, 207, 208, 209 and 210 by July 1 of each year.

2. Except as provided by the director, each distribution only utility shall file with the director only the information required by rules EA 205 and 210 by July 1 of each year.

B. Quarterly

1. Except as provided by the director, each utility shall file with the director the information required by rule EA 211 on a quarterly basis as follows:

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

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

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

d. Information for the period of October 1 to December 31 shall be filed by January 31 of the following year.

2. 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 BASIC FORECAST AND CURRENT DATA

A. Each utility shall submit annually to the director data for the last calendar year and a forecast for the present year and the 15 subsequent years of the generation, the peak demand, and the consumption of electrical energy.

B. The basic forecast and current data shall contain the following data for each year cited in rule EA 206 A in the form requested below.

1. The annual electrical consumption, generation and peak demand forecast shall include:

a. annual total electrical consumption in kilowatt-hours by ultimate consumers within the utility's Minnesota service area;

b. annual total electrical consumption in kilowatt-hours by the utility's ultimate consumers outside its Minnesota service area;

c. 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;

d. the number of kilowatt-hours the utility has delivered or expects to deliver to other systems for resale;

e. total annual gross generation of electrical energy by the utility in kilowatt-hours;

f. annual in-plant consumption of electrical energy in kilowatt-hours (do not include transmission line or substation losses in this category);

g. electrical energy loss in kilowatt-hours due to transmission line and substation losses;

h. peak demand for the system during the summer season and during the winter season;

i. load factor for the system during the summer season and during the winter season.

C. For the last calendar year historical data shall be supplied. If recorded figures are not available, estimates shall be used and shall be identified as such. When the recorded figures become available, they shall be supplied as a supplement to the data. For each other reporting year, a forecast shall be made using the methodology which yields the most meaningful results for the utility's system. The forecast shall be based on the factors which the reporting utility deems most likely to occur in its Minnesota service area. The procedures, assumptions and factors used in arriving at the forecast shall be stated in

writing. Each utility shall comment on probable deviations from the projection. Any utility required to file an extended forecast pursuant to rule EA 207 need not file the forecast documentation required in rule EA 206 C.

EA 207 THE EXTENDED FORECAST

A. The following utilities must file an extended forecast: Northern States Power Company, Minnesota Power and Light Company, Otter Tail Power Company, Interstate Power Company, Minnkota Power Cooperative, Cooperative Power Association, United Power Association and Dairyland Power Cooperative. Data which is compiled within the same calendar year for either an extended forecast or a certificate of need application may be substituted interchangeably to satisfy those portions of both sets of rules which have identical data requirements. In such cases, reference to the material substituted and a copy of the appropriate reference material shall be submitted to meet the reporting requirements.

B. Content of extended forecast. The following data shall be provided:

1. annual electrical consumption by ultimate consumers within the utility's system for the past calendar year, the present calendar year, and the subsequent 15 years, for each of the following categories:

a. farm, excluding irrigation and drainage pumping (for reporting purposes, any tract of land used primarily for agricultural purposes);

b. irrigation and drainage pumping;

c. nonfarm residential (including electricity supplied through a single meter for both residential and commercial uses reported according to its principal use and apartment buildings reported as residential even if not separately metered);

d. commercial (including wholesale and retail trade; communications industries; public and private

office buildings, banks, and dormitories; insurance, real estate and rental agencies; hotels and motels; personal business and auto repair services; medical and educational facilities; recreational, social, religious, and amusement facilities; governmental units, excluding military bases; warehouses other than manufacturer owned; electric, gas, water and water pumping other than pumping for irrigation, and other utilities);

e. mining;

f. industrial (including all manufacturing industries, construction operations and petroleum refineries);

g. street and highway lighting;

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

i. other (including municipal water pumping facilities, oil and gas pipeline pumping facilities, military camps and bases, and all other consumers not reported in categories a through h); and

j. the sum of categories a through i;

2. an estimate for the last year of the demand for power by ultimate consumers in the utility's system for each of the categories listed in rule EA 207 B 1 at the time of the system peak demand;

3. the utility's system peak demand by month for the last calendar year;

4. the utility's average system weekday load factor for the months of January and July for the last calendar year, the present calendar year and the 15 subsequent years;

5. the utility's seasonal firm purchases and seasonal firm sales for each utility involved in each transaction for the last year, the present year, and the 15 subsequent years;

6. the utility's seasonal participation sales for each utility involved in each transaction for the last year, the present year, and the 15 subsequent years;

7. for the summer season and for the winter season of the last year, the present year, and the 15 subsequent years, the load and generation capacity data requested in items a through m listed below, including all anticipated purchases, sales, capacity retirements, and capacity additions, including those which may depend upon certificates of need not yet issued:

a. seasonal system demand;

b. annual system demand;

c. total seasonal firm purchases;

d. total seasonal firm sales;

e. seasonal adjusted net demand (a - c + d);

f. annual adjusted net demand (b - c + d);

g. net generating capacity;

h. total participation purchases;

i. total participation sales;

j. adjusted net capability (g + h - i);

k. net reserve capacity obligation;

l. total firm capacity obligation (e + k); and

m. surplus or deficit (-) capacity (j - l);

8. the utility's proposed additions and retirements. For the present calendar year and the subsequent 15 years, each utility shall provide a list in megawatts of proposed additions and retirements in generating capability; and

9. the utility's method of determining its system reserve margin and the appropriateness of the margin.

C. Forecast documentation for rules EA 206 and 207

1. Forecast methodology. Each applicant may use the forecast methodology which yields the most useful results for its system. However, the applicant shall detail in written form the forecast methodology employed to obtain the forecasts provided under rules EA 206 and 207, including:

a. the overall methodological framework which is used;

b. the specific analytical techniques which are used, their purpose, and the component(s) of the forecast to which they have been applied;

c. the manner in which these specific techniques are related in producing the forecast;

d. where statistical techniques have been used, the purpose of the technique, typical computations (e.g., computer printouts, formulas used) specifying variables and data, and the results of appropriate statistical tests;

e. forecast confidence levels or ranges of accuracy for annual peak demand and annual electrical consumption;

f. a brief analysis of the methodology used, including its strengths and weaknesses, its suitability to the system, cost considerations, data requirements, past accuracy, and any other factors considered significant by the utility; and

g. an explanation of any discrepancies which appear between the forecasts presented by the utility in rule EA 207 and those contained in rule EA 206 this year or in the past years.

2. Data base for forecasts. The utility shall discuss in written form the data base used in arriving at the forecast presented in rules EA 206 and 207, including:

a. a complete list of all data sets used in making the forecast, including a brief description of each data set and an explanation of how each was obtained, (e.g., monthly observations, billing data, consumer survey, etc.) or a citation to the source

(e.g., population projection from the state demographer); and

b. a clear identification of any adjustments made to raw data to adapt them for use in forecasts, including the nature of the adjustment, the reason for the adjustment and the magnitude of the adjustment.

3. Assumptions and special information

a. Discussion. The utility shall discuss in writing each essential assumption made in preparing the forecasts, including the need for the assumption, the nature of the assumption, and the sensitivity of forecast results to variations in the essential assumptions.

b. Subject of assumption. The utility shall discuss the assumptions made regarding the availability of alternative sources of energy, the expected conversion from other fuels to electricity or vice versa, future prices of electricity for customers in the utility's system and the effect that such price changes will likely have on the utility's system demand, the assumptions made in arriving at any data requested in EA 206 or 207 which is not available historically or not generated by the utility in preparing its own internal forecast, the effect of existing energy conservation programs under federal or state legislation on long-term electrical demand, the projected effect of new conservation programs which the utility deems likely to occur through future state and federal legislation on long-term electrical demand, and any other factor considered by the utility in preparing the forecast.

4. Coordination of forecasts with other systems. The utility shall provide in writing:

a. a description of the extent to which the utility coordinates its load forecasts with those of other

systems, such as neighboring systems, associate systems in a power pool, or coordinating organizations; and

b. a description of the manner in which such forecasts are coordinated, and any problems experienced in efforts to coordinate load forecasts.

EA 208 GENERATING FACILITIES

A. Present facilities. Each utility required to report under rule EA 204 A 1 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:

1. the name and type of the plant;

2. its location and address;

3. the primary fuel or blended primary fuels by estimated gross percentage of each which are currently used to operate the plant;

4. the secondary fuels or blended secondary fuels by estimated gross percentage of each which are currently used to operate the plant;

5. name-plate capacity as measured by the sum total of the maximum name-plate rating of each unit of generating equipment in the plant;

6. actual plant capacity as measured by the maximum load that could be supplied by present equipment on a peaking basis of which the utility shall specify duration;

7. the total number of kilowatt-hours generated by the plant for nonplant use during the last calendar year;

8. the annual heat rate of the plant;

9. the quantities of primary and secondary fuels consumed during the last calendar year;

10. the year in which the plant or each unit of a multiunit plant began operation;

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

B. Future facility additions. Each utility required to report under rule EA 204 A 1 shall estimate the additional power plants or additions to existing plants necessary to provide for the energy growth predicted by the forecasts in rules EA 206 and 207. Each utility shall supply the following information about each additional plant or addition:

1. the proposed general location of each plant currently in the planning stage, or the actual location of each plant currently under construction;
2. the month and year the plant is to begin operation;
3. the estimated cost of the new facility at the time of construction;
4. the estimated plant capacity of anticipated generating equipment;
5. the estimated total annual net kilowatt-hours generated for nonplant use by the plant operating at normal conditions under normal maintenance and circumstances;
6. the estimated type and amount of fuel to be used to operate the plant on an annual basis under conditions set forth in EA 208 B 5; and
7. the estimated heat rate of the plant.

C. Future facility retirements. Each utility required to report under rule EA 204 A 1 shall list any planned facility retirements that will take place within the next 15 years. Each utility shall provide the following information about each facility retirement:

1. the location and type of the plant;
2. the year the plant began operation and the forecasted retirement date;
3. the plant's actual capacity;
4. the annual net kilowatt-hours the plant presently generates for nonplant use;
5. the type of primary fuel used for the plant; and
6. the present heat rate for the plant.

D. Fuel requirements and generation by fuel type.

1. Based on the data reported under rule EA 208 A each utility shall report the quantity of coal, natural gas, middle distillates, heavy oils, nuclear energy, and any other fuels used by its Minnesota power plants 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.

2. Each utility shall estimate the quantities of the fuel which will be necessary for use by its Minnesota power plants to provide for the electrical energy growth predicted by the forecast projected in rules EA 206 and 207. Each utility shall also estimate by fuel type the kilowatt-hours of electricity which will be produced by its Minnesota power plants under the forecast. In preparing such estimates, each utility shall consider increases in fuel use by existing facilities and possible conversions between fuel types.

EA 209 TRANSMISSION LINES

A. Existing transmission lines. Each utility shall report the following information in regard to each transmission line over 100 kilovolts now in existence:

1. a map showing the location of each line;

2. the design voltage of each line;

3. the size and type of conductor;

4. the approximate location of D.C. terminals or A.C. substations; and

5. the approximate length of each line and the portion of that length in Minnesota.

B. Transmission line additions. Each generation and transmission utility as defined in EA 202 shall report the information required in rule EA 209 A for all future transmission lines over 100 kilovolts which the utility plans to build within the next 15 years.

C. Transmission line retirements. Each generation and transmission utility as defined in EA 202 shall identify all present transmission lines over 100 kilovolts which the utility plans to retire within the next 15 years.

EA 210 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:

1. the 24-hour period during the summer season when the kilowatt demand on the system was the greatest; and

2. the 24-hour period during the winter season when the kilowatt demand on the system was the greatest;

B. the names, addresses, and the kilowatt-hours of electricity consumed by customers of the utility who annually consume over 600,000 kilowatt-hours. If such a list does not include at least 15 of the utility's customers, the largest 15 shall be listed with their annual consumption of electricity;

C. the names and addresses of the fuel suppliers with whom the utility has 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 unless already reported pursuant to rule EA 207 B 5 and 6;

E. a detailed map, on which the scale is indicated, of the utility's Minnesota service area, identifying power plants, principal substations, and transmission lines over 100 kilovolts, identified by voltage;

F. a listing of the interconnections the utility has with other utilities, including:

1. the names of any such utility;

2. the location of the interconnection; and

3. the kilowatt-hours received or delivered over the connection during the last year;

G. Its present rate schedules as of June 1 of the present year.

I. A copy of whichever of the following reports it files with either the F.P.C. or the U.S. Department of Agriculture:

1. F.P.C. Report 12 Schedule 9 and 10.

2. F.P.C. Report 12A Schedule 3 and 4.

3. Part D of the financial and statistical report to the United States Department of Agriculture.

J. For distribution only utilities the kilowatt-hours generated on an emergency standby basis and the amount of fuel used to generate such electricity.

EA 211 QUARTERLY REPORTS OF 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.

1. Geographic areas will be defined by the customer's county.

2. Customer class will be defined by standard industrial classification (SIC) codes with extensions for more detailed breakdown of households and governmental units.

3. In each customer class/geographic area combination the utility shall report the number of customers and the total kilowatt-hours consumed.

B. After an evaluation of data availability, the director may allow certain distribution only utilities to report only kilowatt-hours consumed by large customers who use in excess of 600,000 kilowatt-hours per year by two-digit SIC code. However, the utilities given such exemption must report each quarter kilowatt-hours consumed by ultimate consumers by F.P.C. or R.E.A. end-use categories. Utilities whose sales to ultimate customers did not exceed 5 million kilowatt-hours during the past calendar year need not report.

C. 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.

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

Upon written request by any utility, the director may allow it 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
APR 27 1977 19
WARREN SPANNAUS, ATTORNEY GENERAL
BY /s/ Michael B. Miller
SPECIAL ASSISTANT ATTORNEY GENERAL

STATE OF MINNESOTA
DEPARTMENT OF STATE
FILED
APR 27 1977 - 10:00 am
Joan Anderson Growe
Secretary of State

STATE OF MINNESOTA
OFFICE OF HEARING EXAMINERS

FOR THE MINNESOTA ENERGY AGENCY

| | | |
|---|---|---|
| In the Matter of the Proposed Adoption of Amendments to Rules of the Minnesota Energy Agency Governing Electric Utility Information Reporting - Minn. Rules EA 201 - 213. | ) ) ) ) ) | REPORT OF HEARING EXAMINER |

The above-entitled matter came on for hearing before Allan W. Klein, duly appointed Hearing Examiner, on January 10, 1977, in Conference Room D of the Veteran's Service Building, Saint Paul, Minnesota.

This was a rules hearing pursuant to Minn. Stat. Chapter 15, to determine whether proposed amendments to Minn. Rules EA 200 - 213 should be adopted.

The following persons appeared for the Minnesota Energy Agency (hereinafter the "Agency"): Daniel Quillin, Research Analyst; Dr. Richard Wallen, Manager of Regulatory Programs; David Jacobson, Chief Energy Facility Analyst; Linda Limback, Applications Programmer; and Dwight Wagenius, Special Assistant Attorney General.

Representatives of two electric utilities (Northern States Power Company and Minnesota Power and Light Company) testified, and both submitted post-hearing statements. Cooperative Power Association, Minnesota - Wisconsin Power Suppliers Group, and the Agency also submitted post- hearing statements.

Pursuant to Minn. Stat. § 15.0412, subd. 4 (1975 Supp.), this Report shall be available for review to all affected individuals upon request for at least ten days.

The Agency shall, if it proposes to adopt the rules as originally proposed or amended, submit the complete hearing record to the Chief Hearing Examiner no earlier than ten days subsequent to the receipt of this Report. The Agency shall include the rules as originally proposed and the rules as proposed for adoption in final form. The Chief Hearing Examiner

shall complete his review and submit his report to the Agency on the issues of substantial changes in the rule and compliance with Minn. Stat. § 15.0412 within ten calendar days. Thereafter, the Agency shall be responsible for filing the rules with the Attorney General.

Based upon all the records and proceedings herein, the Examiner makes the following:

## FINDINGS OF FACT

### PROCEDURAL REQUIREMENTS

1. On November 19, 1976, the Agency filed the following documents with the Chief Hearing Examiner:

(a) A copy of the proposed rules;
(b) A proposed Order for Hearing;
(c) A proposed Notice of Hearing; and
(d) A Statement of the estimated length and number of people attending the hearing.

2. On December 7, 1976, a Notice of Hearing and a copy of the proposed rules were published at 1 State Register 880.

3. On December 9, 1976, the Agency mailed the Notice of Hearing to all persons and associations who had registered their names with the Secretary of State for the purpose of receiving such notice.

4. On Decemaber 16, 1976, the Agency filed with the Office of Hearing Examiners the following documents:

(a) The Order for Hearing;
(b) The Notice of Hearing as mailed;
(c) The Affidavit of Receipt of the Secretary of State's list;
(d) The Affidavit of Mailing;
(e) The Secretary of State's Certificate and list;
(f) The Statement of Need;
(g) The Statement of Evidence.

The documents were available for inspection at the Office of Hearing Examiners from the date of filing to the date of the hearing.

5. The record remained opened through February 1, 1977, for the receipt of written comments and statements. Five post-hearing submissions were received, all on February 1st.

### STATUTORY AUTHORITY

6. The legislation creating the Agency was enacted

in 1974. While there have been a number of amendments in 1975 and 1976, the basic structure has remained intact. The proposals under consideration in this proceeding are amendments to existing rules, EA 200 - 213, which became effective on June 2, 1975. As EA 200 states, § 116H.08 (a) confers rule-making powers upon the director:

> The director may...adopt rules and regulations pursuant to Chapter 15 to carry out the purposes of sections 116H.01 to 116H.15.

These proposals relate to the filing of quarterly and annual reports by each "generating and transmission utility" and "distribution only utility", as well as requiring the filing of a brief registration statement by any new electric utility. The principal change proposed by these rules is in the area of extended forecasts which they would require from eight major electric utilities named in proposed EA 207. This, the Agency alleges, is to be required to fulfill the Agency's mandate as set forth in Section 116H.10, Subdivisions 1 and 2:

> Subdivision 1. In order to further the purposes of sections 116H.01 to 116H.15, the director shall develop and maintain an effective program of collection, compilation, and analysis of energy statistics. The statistical program shall be developed to insure a central state repository of energy data and so that the state may coordinate and cooperate with other governmental data collection and record keeping programs.
>
> Subdivision 2. In addition to supplying such current statistical and short range forecasting information as the director may require, each utility, coal supplier, petroleum supplier and large energy facility in the state shall prepare and transmit to the director by July 1, 1975, and every year thereafter, a report specifying in five, ten, and 15-year forecasts the projected demand for energy within their respective service areas and the facilities necessary to meet the demand.
>
> The report shall be in a form specified by the director and contain all information deemed relevant by the director.

In addition, Section 116H.07, Subdivision 1, imposes certain duties upon the director, including the following:

> (a) Manage the agency as the central repository within the state government

for the collection of data on energy; and

(e) Collect and analyze data relating to present and future demands and resources for all sources of energy, and specify energy needs for the state and various service areas as a basis for planning large energy facilities.

PROPOSED CHANGES IN EA 201 - 205 and 211 - 213

7. That there are numerous changes to existing rules which drew no criticism or discussion, either at the hearing or in the post-hearing submissions. The Agency, in its Statement of Need, set forth the need for, and reasonableness of, those changes, and those which were uncontested or unquestioned will not be further discussed.

PROPOSED CHANGES IN EA 206

8. That the first proposal which generated any discussion was proposed EA 206(B)(1). That proposal would require a utility to break-down its forecasted annual electrical consumption into two categories -- ultimate consumers within its Minnesota service area, and ultimate consumers outside its Minnesota service area. There was some concern raised at the hearing by representatives of both NSP and MP&L that they would have to further break-down the information for outside-area-consumers into various types of consumers, such as farm, residential, commercial, etc., and they wondered why the Agency would want that information. (T. pp. 103-109). The Agency stated that it was not their intent to require such a detailed forecast, and in its post-hearing submission, the Agency added the word "total" to both EA 206(B)(1)(a) and (b) to indicate that it wanted only aggregate data. This is also the result sought by David Gartzke of MP&L in his post-hearing submission. This addition is reasonable.

PROPOSED EA 207

9. That proposed EA 207 generated more discussion and criticism than any other proposal. The rule would require eight named utilities to submit, annually, an extended forecast

of consumption, peak demand, load and generation capacity, and other data. It would also require those utilities to detail their assumptions, methodology and data base used in the forecasts. The Agency stated that this comprehensive data was required only from the eight listed utilities because they generate 80% of the electricity consumed in the state (Statement of Need, page 9).

The principal criticism of EA 207 was that it would require duplicative filings for those utilities involved in the Certificate of Need process. Daniel Quillin of the Agency admitted that many of the items requested in EA 207 are also required in EA 635 and 636 as a part of the Certificate of Need filings (T. p. 34). It was estimated that between 75 and 90% of the data would be duplicative (T. p. 56).

The Agency responded to that criticism by pointing out that while NSP had filed three Certificate of Need applications in the past year, four of the affected utilities have never gone through the present Certificate of Need process, and thus, the Agency does not have the data from those utilities (T. p. 59).

The result of the duplication discussion was a proposal made by the Agency in its post-hearing submission, that EA 207(A) be amended by adding the following language:

> Data which is compiled within the same calendar year for either an extended forecast or a certificate of need application may be substituted interchangeably to satisfy those portions of both sets of rules which have identical data requirements. In such cases, reference to the material substituted and a copy of the appropriate reference material shall be submitted to meet the reporting requirements.

This proposed change was one of a number suggested by the Agency after the hearing, and Joseph Bizzano, Jr. of NSP stated in NSP's post-hearing submission, that "These suggested changes appear to substantially alleviate our concerns if they are adopted by the Hearing Examiner and the Agency." This proposal is a reasonable compromise to mitigate unnecessary duplication.

Secondary concerns with EA 207 arose from two specific requirements of reporting the methodology used in the forecasts. Proposed 207(C)(1)(e) would require that the utilities forecast confidence levels, or ranges of accuracy, for annual peak demand and annual consumption. 207(C)(1)(f) would require an analysis of the methodology, including its strengths and weaknesses, its suitability to the system, and other factors.

With respect to confidence levels, David Gartzke of MP&L stated that MP&L did not use such data, but that it could generate it. He questioned its usefulness. David Jacobson of the Agency agreed that past confidence level computations by MP&L had not been too useful (T. pp. 73-83). The reason for this, both agreed, was MP&L's peculiar concentration of demand from one industry, the taconite industry, and the uncertainty which that concentration generates for MP&L's forecasting. But the Agency argued that having some estimate of confidence levels, imprecise as MP&L's may be, was better than none at all, as the Agency had to make such estimates in its own reports to the Governor and the legislature (T. p. 76, and Agency's Post-Hearing Submission). The Agency's position is reasonable.

With respect to EA 207(C)(1)(f), which requires an analysis of the methodology, its strengths and weaknesses, etc., Richard Kolkmann of NSP asked whether this information was important to the Agency (T. pp. 67-68). It was pointed out that the same information was required in EA 635(c)(1)(vi) for Certificate of Need applications, and David Jacobson of the Agency stated that it had been found useful because the methodologies used by the various utilities "are so different" (T. p. 70). On hearing this, Kolkmann stated that he didn't have a strong objection to it and that it was not difficult to comply with (T. p. 72). The Agency's proposal is reasonable.

MP&L made two other suggestions on EA 207(C) in its post-hearing submission. In the first of these, proposed EA 207(C)(1)(c) would require the utilities to discuss the

manner in which specific analytical techniques used in the methodology are related in producing the forecast. MP&L would expand this section to also require a discussion of "annual electrical consumption as it may apply to the method employed to obtain the forecasts." While it is unclear, it appears that this expansion would permit MP&L to explain why it chose the forecasting method which it selected. Presumably, this would relate to MP&L's peculiar concentration of demand noted earlier, and to testimony at the hearing in which MP&L's attorney, Philip Halverson, stated that the best way of predicting the taconite demand is by direct contact with the taconite companies (T. p. 77).

To adopt this proposed expansion would be duplicative of requirements in other parts of this very section. EA 207(C)(1)(f), already discussed above, requires the utilities, in analyzing their methodology, to discuss "its suitability to the system". It would seem most appropriate for MP&L to include its explanation of why it chose its methodology in that section, as it directly relates to suitability.

The second post-hearing proposal from MP&L for EA 207 relates to EA 207(C)(3)(a). The Agency's proposed rule would require a utility to disclose the assumptions which underlie its forecast, "including the need for the assumption, the nature of the assumption, and the sensitivity of forecast results to variations in the essential assumptions." It is the final part of this rule, the sensitivity portion, which concerns MP&L. In its post-hearing submission, MP&L states "...the sensitivity of each assumption implies that we use an econometric model which yields point estimates of a forecast from which elasticity measures can be made (the sensitivity or degree of responsiveness of electrical consumption to changes in an explatory variable)." Although it is not expressly stated in the post-hearing submission, a review of the hearing transcript indicates that, at least in some of the specific assumptions listed in EA 207(C)(3)(b), MP&L has made no such

elasticity studies in the past and would find them difficult, if not impossible, to make in the future. A good example of this problem is discussed in the transcript with respect to price elasticity, or the sensitivity of demand to price changes. The rule would require the utilities to state what assumption was made regarding "future prices of electricity for customers in the utility's system and the effect that such price changes will likely have on the utility's system demand". In other words, the Agency wants to know what assumptions are being made about price changes, and the sensitivity of demand to such price changes. MP&L requests that the director be given discretion to waive this disclosure "if the methodology which yields the most useful results for a utility's system does not lend itself to a sensitivity analysis." At the hearing, David Gartzke of MP&L stated that MP&L had not done a price elasticity study in the past (T. p. 82), and Philip Halvorson asked whether the Agency was asking MP&L to do such a study, or whether the Agency merely wanted a statement of what assumption had been made (T. pp. 82-83). Richard Wallen replied for the Agency:

> If you made no adjustment in your forecast for prices, then you can assume that your forecast is not sensitive to the price of electricity. In other words, that's the assumption you made....in other words, a perfectly acceptable response, as far as I'm concerned, under 3 - B would be, "We made no assumption about the impact of the price of electricity on the demand for electricity. In other words, our forecasts do not include any price elasticity factor."
>
> (Transcript, pp. 83-84)

Wallen went on to say that the Agency would pool the information from these eight utilities, and construct it's own forecast. But in order to be sure it was pooling consistent figures, it was necessary to adjust those figures to a consistent set of assumptions. The Agency needed to know whether a price elasticity assumption was included in MP&L's forecast. If it had not been, or if MP&L's assumption was deemed inaccurate, the Agency (not MP&L) would change MP&L's

forecast by what it determined to be the proper price elasticity factor. By doing this to all eight forecasts, the Agency could be assured that when they were all added together, they would be consistent. Price elasticity has been used here merely as an example of some of the sensitivity problems raised by Gartzke.

Gartzke's concern is well-founded. If the Agency would be satisfied with a statement that no assumption had been made, then the wording of the rule (which would require a discussion of the sensitivity of forecast results to the variations in each essential assumption) is inappropriate. MP&L proposes adding, to EA 207(C)(1)(a), the following sentence:

> If the methodology which yields the most useful results for a utility's system does not lend itself to a sensitivity analysis ~~then (sic--should be "then")~~ this requirement may be waived by the ~~director~~.

Note: After hearing examiner issued report he called and suggested language change to the Act. We did not submit any suggested changes in this language. We felt it would be improper practice because his suggestion

This proposal should be adopted by the Agency to clarify its stated intent.

PROPOSED EA 208

10. That the amendments proposed to existing EA 207 (proposed EA 208) are generally a "fine tuning" of the existing language, with one major exception. That is proposed EA 208(C) which requires each "generating and transmission utility" to forecast the retirement of existing facilities over the next 15 years. This new subsection did not draw as much criticism as other parts of the rule, but Charles Wood of MP&L, in a post-hearing submission, stated that such facility retirement dates are "difficult to forecast" with any certainty, and he did not want to have MP&L's forecasts taken as definite commitments. For this reason, he proposed that the Agency's proposal for 207(C)(2) be amended as follows:

> The year the plant began operation and the ~~year it will cease operation~~ forecasted retirement date.

The Agency did not respond to this suggestion in its post-hearing submission, but it is clear from discussion at the hearing on analogous matters that the Agency understands that,

particularly as the forecasted period lengthens, certainties diminish, and the utilities' estimates should more properly termed "guesses". There is nothing in the record to suggest that the Agency would treat a facility retirement forecast as a commitment by the utility to retire on a given date, but it would be reasonable for the Agency to clarify this understanding by adopting the proposed change.

The most substantial criticism of EA 208 was that it duplicates information required to be submitted to the Minnesota Environmental Quality Council pursuant to MEQC 74. An examination of MEQC 74(a) and proposed EA 208 reveals substantial similarities, but also a definite difference in the orientation of the two rules, with MEQC 74 asking for more information about land use plans, easements, and routes, while EA 208 asks for more information about fuels, peak capacity and heat rate.

More importantly, the facility forecast of MEQC 74(a) is required to be filed with the EQC biannually [see MEQC 72(b)] while the generating facilities report of EA 208 is required to be filed annually.

While such duplication is regrettable, the Agency's proposal is reasonable and may be adopted.

The final point raised with respect to EA 208 was raised by NSP both at the hearing and in its post-hearing submission. EA 208(A)(3) and (4) request information on the primary and secondary fuels currently used in existing facilities, and EA 207(B)(6) asks for information about the estimated type of fuel to be used in future plants. Leon Barrett of NSP stated that many of the company's coal fired plants use a blend of two or more coals, and wondered whether the Agency wanted to have those types identified and their use quantified. Richard Wallen of the Agency stated that they would like to know the types and percentages (T. pp. 109-110). Joseph Bizzano of NSP, in his post-hearing submission, also noted that "...it is understood, of course, that the 'primary' fuel utilized in most of

NSP's coal-fired generating plants is actually a blend of two or more types of coal." If the Agency feels it would be necessary to clarify this point, such a clarification would be reasonable so long as it was limited to the gross percentage estimates suggested by Richard Wallen at page 109 of the Transcript.

PROPOSED EA 209

11. That proposed EA 209 represents a substantial expansion of the requirements in existing EA 208.

The greatest controversy arose over EA 209(A)(3) and (A)(6). The first of these requires information on the design power capability of each major transmission line, while the second requires information on the estimated losses of each such line. With respect to the first of these, design power capability, it was pointed out at the hearing that this was susceptible to varying definitions, (T. pp. 120, 126-127) that depending on which definition was chosen, the data might vary over time (T. p. 121), and that it was a relatively useless figure which was expensive to generate (T. pp. 130 and 143). After a dialogue between Agency personnel and industry representatives, the Agency suggested substituting "the size and type of conductor." This was met by approval from the industry representatives (T. pp. 146-147). The Agency confirmed this change in its post-hearing submission, and its acceptance was urged by MP&L, Minnesota - Wisconsin Power Suppliers Group, and CPA in their submissions.

The second requirement, relating to line losses, was also criticized as being difficult to define, (T. pp. 112, 114 and 115) not presently measured, as such, by the utilities (T. p. 116), and expensive to generate solely for the Agency (T. p. 130). The Agency agreed with some of the criticisms, and suggested deleting the requirement (T. p. 117). This is the position taken in the Agency's post-hearing submission, and it is supported by MP&L, M-W PSG, and CPA in the submissions. In light of the evidence, the deletion would be reasonable.

The other criticisms of EA 209 related to requirements to forecast transmission line additions and retirements contained in EA 209(B) and (C), respectively. The criticisms dealt with questions of certainty, with Philip Halvorson of MP&L stating that three years away plans may be crystallizing, but that "plans" eight years in the future are really just speculation (T. pp. 131 and 132). Richard Wallen of the Agency pointed out that the eight major utilities already compiled similar information for biannual submission to the EQC (T. pp. 132 and 133). In his post-hearing submission, Charles Wood of MP&L stated that the data requested in 209(B) and (C) was "nearly identical" to that required to be supplied to the EQC pursuant to Section 116C.54, with the only difference being that the EQC reports are supplied every two years, while the Energy Agency would require the data every year.

Section 116H.10, Subdivision 3 (which is in the same section as the subdivisions requiring utilities to make annual reports to the Agency) states:

> The director shall, to the maximum extent feasible, provide that forecasts required under this section be consistent with material required by other state and federal agencies in order to prevent unnecessary duplication.

Apparently the legislature foresaw duplication as a part of the annual reporting process. In Section 116H.04, Subdivision 3(d), the Legislative Commission on Energy is charged with assisting the director in eliminating duplication in effort among governmental agencies. Finally, Section 116H.06 states that the Agency's authority shall supersede that given any other agency when there is any duplication. Although undesirable, the Agency's position is supported by law and is reasonable.

PROPOSED EA 210

12. That while EA 210 was not discussed at the hearing, MP&L raised two points about proposed EA 210 in its post-hearing submission.

The first suggestion is that proposed EA 210(G), which would require each utility to report "its present rate schedule as of June 1, of the present year", be amended by changing the word "schedule" to "schedules". MP&L points out that there is more than one rate schedule. This is a minor matter, as the intent of the proposed rule is clear, and a utility with more than one schedule would probably interpret the requirement to apply to all schedules. However, it would clarify the rule if the Agency were to adopt this suggestion. Such a change would be reasonable.

The second point raised by MP&L is more substantive. They point out that the rate schedules are filed with the Public Service Commission (allegedly on the same floor of the same building where the Agency is located) and that to require a duplicate filing with the Agency is costly, wasteful, and contrary to public policy.

Many of the arguments noted earlier with respect to duplicative filings with other state agencies apply again in this case, and there is no need to repeat them here. The Agency's position is supported by law and is reasonable.

Based upon the foregoing Findings of Fact, the Hearing Examiner makes the following:

CONCLUSIONS OF LAW

1. That due, timely and adequate legal notice of the hearing was properly served and published by the Agency. All other substantive and procedural requirements of Chapter 15 and relevant rules were fulfilled.

2. The Agency has demonstrated its statutory authority to adopt the proposed rules.

3. With the exceptions noted in the Findings, the Agency has demonstrated the need for and reasonableness of the proposed rules.

Based upon the foregoing Conclusions, the Hearing Examiner makes the following:

## RECOMMENDATIONS

1. It is recommended that the rules be modified as suggested in the Agency's post-hearing submission and the Findings, and that, so modified, they be adopted.

2. The Examiner further recommends that the Agency give serious consideration to the concerns raised regarding duplication of filings with other state agencies, and that after consultation with those agencies and the Governor, steps be taken to eliminate that duplication.

Dated: February 18, 1977.

Allan W. Klein

ALLAN W. KLEIN
Hearing Examiner

STATE OF MINNESOTA

MINNESOTA ENERGY AGENCY

| | | |
|---|---|---|
| In the Matter of the Proposed Adoption of Amended Rules of the Minnesota Energy Agency Governing Electric Utility Information Reporting Minn. Regs. EA 201-213 | ) ) ) ) ) | Docket No. EA-77-004-AK<br><br>DIRECTOR'S FINDINGS OF FACT, CONCLUSIONS AND DECISION |

The hearing in the above-captioned matter was ordered on November 19, 1976, and was convened for the Minnesota Energy Agency (hereinafter "Agency") by Hearing Examiner Allan W. Klein of the Minnesota Office of Hearing Examiners at 9:30 a.m. January 10, 1977, in Conference Room D of the Veterans Service Building, Saint Paul, Minnesota.

The hearing examiner made and issued his Findings of Fact, Conclusions and Recommendations to the Agency on February 18, 1977. The hearing examiner recommended to the Agency that it adopt the Agency's proposed amended rules incorporating certain language changes suggested by the hearing examiner.

The director of the Agency, upon the record certified to him by the hearing examiner and the Findings, Conclusions and Recommendations made by the hearing examiner, hereby makes and issues the following Findings of Fact, Conclusions and Decision.

## FINDINGS OF FACT

1. In general the hearing examiner did a reasonable and thorough job of presenting his Findings in the above-captioned matter. The hearing examiner's Findings 1-8 and 10-12 are hereby adopted as the Findings of the director.

2. In respect to Finding 9 the director hereby adopts all portions of the Finding with the exception of the last recommendation where the hearing examiner added the following underlined language to EA 207 C 1 a:

C. Forecast documentation for rules EA 206 and 207

1. Forecast Methodology. Each applicant may

use the forecast methodology which yields the most useful results for its system. However, the applicant shall detail in written form the forecast methodology employed to obtain the forecasts provided under rules EA 206 and 207, including:

a. the overall methodological framework which is used. If the methodology which yields the most useful results for a utility's system does not lend itself to a sensitivity analysis then this requirement may be waived by the director.

The reason for the rejection of this recommendation is that the hearing examiner's rationale for it is not clear and the addition of this language would confuse, not clarify, the information requirements.

The reason offered for the change is directly related to the wording in EA 207 C 3 a. One utility perceives when the agency asks for a "discussion" of its forecast assumptions "including the need for the assumption, the nature of the assumption, and the sensitivity of forecast results to variations in the essential assumptions" that the agency is in effect requiring that the utility use an econometric model in order to discuss "the sensitivity of the forecast to variations in the essential assumptions". It is apparent from the utility's testimony that it perceives "sensitivity analysis" and econometric modeling as synonymous. This perception is simply not true. If the agency felt an econometric model was necessary for a "discussion" by the utility of the sensitivity of its forecast to its essential assumptions, we would have requested an econometric model. We do not feel an econometric model is absolutely necessary so we have intentionally excluded asking for one. The utilities should not try to read more into the regulations than what is asked for.

Should a utility wish to develop an econometric model as a demonstration of the sensitivity of its forecast to certain essential assumptions that is fine and good. Because the agency recognizes

the complexity of such econometric modeling, and because such modeling may not always lend itself to each utility's particular service area, we have intentionally not required it.

On the other hand I see no reason why each utility cannot "discuss...the sensitivity of its forecast...to variations in the essential assumptions". There is no way that this can or should be seen as a requirement for a sensitivity analysis requiring an econometric model. In EA 207 C 3 a and b we are requiring simply a discussion of each of the essential assumptions made in developing the forecast and what effect changes in these essential assumptions will have on the forecast developed for the Agency. The greater detail a utility can provide in discussing the sensitivity of a forecast to changes in the essential assumptions the better, but there is no requirement that a discussion of the sensitivity of a forecast assumption demands an econometric model. For this reason the recommendation that the director be given authority to waive "a sensitivity analysis" which is equated with a requirement for econometric modeling is neither needed nor desirable. In the judgment of the director the rules clearly indicate what is asked for and clearly do not require "econometric modeling".

The hearing examiner's change also is undesirable because of where it is added. If the language were adopted as suggested any utility whose forecast did not lend itself to sensitivity analysis and received a waiver would not even have to detail in writing "the overall methodological framework which is used" in the forecast. Such a waiver would render the forecast useless. Unless the director knows the method used to develop the forecast, he has no way of analyzing its validity or accuracy. Clearly from this standpoint I cannot approve of this recommendation or it could cripple the Agency's ability to analyze the validity and accuracy of a utility's forecast.

For these two reasons I am not accepting the hearing examiner's suggestion in regard to this item.

3. In regard to the hearing examiner's recommendation that the Agency take further action to limit or eliminate data duplications

with other state agencies, I concur and will shortly initiate discussions with affected state agencies on reducing duplication while meeting our statutory mandates and obligations.

4. Finally, I have made minor grammatical changes to achieve consistency in the rules. These changes have in no way had any effect on the meaning of the rules.

## CONCLUSIONS

The director concurs with the Conclusions made by the hearing examiner and hereby adopts them as his own.

## DECISION

The director accepts the recommendation of the hearing examiner to adopt the proposed amended rules and in a separate Order adopts amended rules EA 201-213 incorporating the hearing examiner's changes with the exception indicated in the director's Findings. A copy of rules EA 201-213 as adopted is attached.

Dated: March 28, 1977

John P. Millhone
Director

RULES AND REGULATIONS GOVERNING

ELECTRIC UTILITY INFORMATION REPORTING

EA ~~200~~ 201 to EA 213

EA ~~200~~ 201 PURPOSE AND APPLICABILITY OF THESE RULES

A. 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 (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 statewide and service area energy needs.

~~EA-201--APPLICABILITY-OF-THESE-RULES~~

B. 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. "Adjusted Net Demand" means system demand, minus firm purchases, plus firm sales;

~~(a)~~B. "Agency" means the Minnesota Energy Agency;

~~(b)--"Annual-Conversion-Efficieney"-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 Adjusted Net Demand" means annual system demand, minus firm purchases, plus firm sales;

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

~~(d)--"Annual-Plant-Efficieney"-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 Demand" means the highest system demand occurring during the twelve-month period beginning May 1 of the forecast year;

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

~~(f)~~G. "Distribution ~~o~~Only ~~u~~Utility" means a utility which distributes electricity to ultimate consumers but which does not generate electricity except on a standby emergency basis. Such emergency power shall not consist of more than five percent of total kilowatt-hours sales to ultimate consumers;

H. "Firm Purchases" and "Firm Sales" means the amount of power to be purchased or sold and intended to have assured availability;

~~(g)~~I. "Generating and ~~t~~Transmission ~~u~~Utility" means ~~a~~ any utility which generates ~~electricity and transmits it to other utilities or distributes it to ultimate consumers;~~ in excess of five percent of its total kilowatt-hour sales to other utilities or its own ultimate consumers;

J. "Heat Rate" is the measure of thermal efficiency of a generating station or plant expressed in BTU's per net kilowatt-hour and computed by dividing the total BTU content of fuel burned for electric generation by the resulting net kilowatt-hour generation;

K. "Large Electric Generating Facility (LEGF)" means any electric power generating plant or combination of plants at a single site and associated facilities designed for or capable of operation at a combined capacity of 50,000 kilowatts or more, including, but not limited to, fossil fuel, nuclear fuel, pumped storage and hydroelectric plants;

L. "Large High Voltage Transmission Line (LHVTL)" means a conductor of electrical energy and associated facilities designed for and capable of operation at a nominal voltage of 200 kilovolts or more having more than 160 kilometres (100 miles) of its length in Minnesota. Associated facilities shall include, but not be limited to, insulators, towers, and substations and

terminals operating at a nominal voltage of 200 kilovolts or more;

~~(h)~~M. "Last ~~c~~Calendar ~~y~~Year" means the calendar year immediately preceding the year in which reports are required to be filed;

~~(i)~~N. "Load ~~f~~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)~~O. "Minnesota Service Area" means ~~the geographical area within the State of Minnesota to which a utility supplies electrical energy~~ that portion of a utility's system lying within Minnesota;

P. "Net Generating Capacity" means the total amount of kilowatts, less station use, that all the generating facilities of a system could supply at the time of its maximum system demand, including the capacity of the generating units which are temporarily out of service for maintenance or repair;

Q. "Net Reserve Capacity Obligation" means the annual adjusted net demand multiplied by the percent reserve capacity requirement;

R. "Participation Power" means power and energy which are sold from a specific generating unit or units for a period of six or more months on a continuously available basis (except when such unit or units are temporarily out of service for maintenance during which time the delivery of energy from other generating units is at the seller's option);

S. "Participation Purchases" and "Participation Sales" means purchases and sales under a participation power agreement or a seasonal participation power agreement;

~~(k)~~T. "Peak ~~d~~Demand" means the highest kilowatt demand during a designated period recorded on a one-hour integrated reading basis;

U. "Seasonal Adjusted Net Demand" means seasonal system demand, minus firm purchases, plus firm sales;

V. "Seasonal Participation Power" means participation power sold and bought on a seasonal (summer or winter) basis;

W. "Seasonal System Demand" means the maximum system demand on the applicant's system which occurs or is expected to occur in any normal summer season or winter season;

~~(t)~~X. "Summer ~~months~~ Season" means the period from May 1~~st~~ through October 31~~st~~; ~~Winter-months-means-the-period-from-November-1st-through-April-30th;~~

Y. "System" means that combination of generating, transmission, and distribution facilities which make up the operating physical plant of the utility, whether owned or nonowned, for the delivery of electrical energy to ultimate consumers and includes the geographic area where the utility's ultimate consumers are located;

Z. "System Demand" means the number of kilowatts which is equal to the kilowatt-hours required in any clock hour, attributable to energy required by the system during such hour for supply of firm energy to ultimate consumers, including system losses, and also including any transmission losses occurring on other systems and supplied by the system for transmission of firm energy, but excluding generating station uses and excluding transmission losses charged to another system;

~~(m)~~AA. "Utility" means any entity engaged 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;

BB. "Ultimate Consumers" means consumers purchasing electricity for their use and not for resale; and

~~(t)~~CC. "Winter ~~months~~ Season" means the period from November 1~~st~~ through April 30~~th~~.

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 headquarters 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. Annual

~~(a)~~ 1. 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 rules EA 205, 206, 207, 208, 209 and ~~211~~ 210 by July 1 of each year.

~~(b)~~ 2. Except as provided by the director, each distribution only utility shall file with the director only the information required by rules EA 205 and ~~EA 209~~ 210 by July 1 of each year. ~~if all of its source generating and transmission utilities are required under these regulations to report to the director.~~

B. Quarterly

~~(c)~~ 1. Except as provided by the director each utility shall file with the director the information required by rule EA ~~210~~ 211 on a quarterly basis as follows:

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

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

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

d. Information for the period of October 1 to December 31 shall be filed by January 31 of the following year.

2. 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~~ BASIC FORECAST AND CURRENT DATA

~~(a)~~A. Each utility shall submit annually to the director ~~5, 10 and 15 year forecasts~~ data for the last calendar year and a forecast for the present year and the 15 subsequent years of the generation, the peak demand, and the consumption of electrical energy. ~~within its Minnesota Service Area.~~

~~(b)~~B. The ~~energy forecasts~~ basic forecast and current data shall contain the following data for each ~~reporting~~ year cited in rule EA 206 A in the form requested below.

~~(i)~~1. The annual electrical consumption~~/production~~, generation and peak demand forecast shall include:

~~(aa)~~a. ~~A~~annual electrical consumption in kilowatt-hours by ultimate consumers within the utility's Minnesota service area;

b. annual electrical consumption in kilowatt-hours by the utility's ultimate consumers outside its Minnesota service area;

~~(bb)~~c. ~~T~~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)~~d. ~~T~~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)~~e. ~~T~~total annual gross ~~production~~ generation of electrical energy by the utility in kilowatt-hours;

~~(ee)~~f. ~~A~~annual in-plant consumption of electrical energy in kilowatt-hours (do not include transmission line or substation losses in this category);

~~(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 ee aa~~

g. electrical energy loss in kilowatt-hours due to transmission line and substation losses;

~~(ii) Electrical demand forecast.~~

~~(aa)~~h. ~~P~~peak demand ~~data~~ for the ~~Minnesota service area~~ system during the summer ~~months~~ season and during the winter ~~months~~ season;

~~(bb)~~i. ~~L~~load factor ~~data~~ for the ~~Minnesota service area~~ system during the summer ~~months~~ season and during the winter ~~months~~ season.

~~(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 7175.~~

~~(c)~~C. 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. When the recorded figures become available, they shall be supplied as a supplement to the data. 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~~ the methodology which yields the most meaningful results for the utility's system. The forecast shall be based on the factors which the reporting utility deems most likely to occur in its Minnesota Sservice Aarea. ~~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 procedures, 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. Any utility required to file an extended forecast pursuant to rule EA 207 need not file the forecast documentation required in rule EA 206 C.

EA 207 THE EXTENDED FORECAST

A. The following utilities must file an extended forecast: Northern States Power Company, Minnesota Power and Light Company, Otter Tail Power Company, Interstate Power Company, Minnkota Power Cooperative, Cooperative Power Association, United Power Association and Dairyland Power Cooperative.

B. Content of extended forecast. The following data shall be provided:

1. annual electrical consumption by ultimate consumers within the utility's system for the past calendar year, the present calendar year, and the subsequent 15 years, for each of the following categories:

a. farm, excluding irrigation and drainage pumping (for reporting purposes, any tract of land used primarily for agricultural purposes);

b. irrigation and drainage pumping;

c. nonfarm residential (including electricity supplied through a single meter for both residential and commercial uses reported according to its principal use and apartment buildings reported as residential even if not separately metered);

d. commercial (including wholesale and retail trade; communications industries; public and private office buildings, banks, and dormitories; insurance, real estate and rental agencies; hotels and motels; personal business and auto repair services; medical and educational facilities; recreational, social, religious, and amusement facilities; governmental units, excluding military bases; warehouses other than manufacturer owned; electric, gas, water and water pumping other than pumping for irrigation, and other utilities);

e. mining;

f. industrial (including all manufacturing industries, construction operations and petroleum refineries);

g. street and highway lighting;

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

i. other (including municipal water pumping facilities, oil and gas pipeline pumping facilities, military camps and bases, and all other consumers not reported in categories a through h); and

j. the sum of categories a through i;

2. an estimate for the last year of the demand for power by ultimate consumers in the utility's system for each of the categories listed in rule EA 207 B 1 at the time of the system peak demand;

3. the utility's system peak demand by month for the last calendar year;

4. the utility's average system weekday load factor for the months of January and July for the last calendar year, the present calendar year and the 15 subsequent years;

5. the utility's seasonal firm purchases and seasonal firm sales for each utility involved in each transaction for the last year, the present year, and the 15 subsequent years;

6. the utility's seasonal participation sales for each utility involved in each transaction for the last year, the present year, and the 15 subsequent years;

7. for the summer season and for the winter season of the last year, the present year, and the 15 subsequent years, the load and generation capacity data requested in items a through m listed below, including all anticipated purchases, sales, capacity retirements, and capacity additions, including those which may depend upon certificates of need not yet issued:

a. seasonal system demand;

b. annual system demand;

c. total seasonal firm purchases;

d. total seasonal firm sales;

e. seasonal adjusted net demand (a - c + d);

f. annual adjusted net demand (b - c + d);

g. net generating capacity;

h. total participation purchases;

i. total participation sales;

j. adjusted net capability (g + h - i);

k. net reserve capacity obligation;

l. total firm capacity obligation (e + k); and

m. surplus or deficit (-) capacity (j - l);

8. the utility's proposed additions and retirements.

For the present calendar year and the subsequent 15 years each utility shall provide a list in megawatts of proposed additions and retirements in generating capability; and

9. the utility's method of determining its system reserve margin and the appropriateness of the margin.

C. Forecast documentation for rules EA 206 and 207

1. Forecast methodology. Each applicant may use the forecast methodology which yields the most useful results for its system. However, the applicant shall detail in written form the forecast methodology employed to obtain the forecasts provided under rules EA 206 and 207, including:

a. the overall methodological framework which is used;

b. the specific analytical techniques which are used, their purpose, and the component(s) of the forecast to which they have been applied;

c. the manner in which these specific techniques are related in producing the forecast;

d. where statistical techniques have been used, the purpose of the technique, typical computations (e.g., computer printouts, formulas used) specifying variables and data, and the results of appropriate statistical tests;

e. forecast confidence levels or ranges of accuracy for annual peak demand and annual electrical consumption;

f. a brief analysis of the methodology used, including its strengths and weaknesses, its suitability to the system, cost considerations, data requirements, past accuracy, and any other factors considered significant by the utility; and

g. an explanation of any discrepancies which appear between the forecasts presented by the utility in rule EA 207 and those contained in rule EA 206 this year or in past years.

2. Data base for forecasts. The utility shall discuss in written form the data base used in arriving at the forecast presented in rules EA 206 and 207, including:

a. a complete list of all data sets used in making the forecast, including a brief description of each

data set and an explanation of how each was obtained, (e.g., monthly observations, billing data, consumer survey, etc.) or a citation to the source (e.g., population projection from the state demographer); and

b. a clear identification of any adjustments made to raw data to adapt them for use in forecasts, including the nature of the adjustment, the reason for the adjustment and the magnitude of the adjustment.

3. Assumptions and special information

a. Discussion. The utility shall discuss in writing each essential assumption made in preparing the forecasts, including the need for the assumption, the nature of the assumption, and the sensitivity of forecast results to variations in the essential assumptions.

b. Subject of assumption. The utility shall discuss the assumptions made regarding the availability of alternative sources of energy, the expected conversion from other fuels to electricity or vice versa, future prices of electricity for customers in the utility's system and the effect that such price changes will likely have on the utility's system demand, the assumptions made in arriving at any data requested in EA 206 or 207 which is not available historically or not generated by the utility in preparing its own internal forecast, the effect of existing energy conservation programs under federal or state legislation on long-term electrical demand, the projected effect of new conservation programs which the utility deems likely to occur through future state and federal legislation on long-term electrical demand, and any other factor considered by the utility in preparing the forecast.

4. Coordination of forecasts with other systems. The utility shall provide in writing:

a. a description of the extent to which the utility coordinates its load forecasts with those of other systems, such as neighboring systems, associate systems in a power pool, or coordinating organizations; and

b. a description of the manner in which such forecasts are coordinated, and any problems experienced in efforts to coordinate load forecasts.

EA 208 ~~FACILITY REQUIREMENTS~~ GENERATING FACILITIES

~~(a)~~A. Present facilities. Each utility required to report under rule EA 204~~(a)~~ A 1 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)~~1. the name and type of the plant;

~~(ii) the year constructed;~~

~~(iii)~~2. its location and address;

~~(iv)~~3. the primary fuel which is currently used to operate the plant;

~~(v)~~4. the secondary fuels which are currently used to operate the plant;

~~(vi)~~5. 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)~~6. 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)~~7. the total number of kilowatt-hours generated by the plant for nonplant use during the last calendar year;

~~(ix)~~8. the annual ~~conversion efficiency~~ heat rate of the plant;

~~(x)~~9. the quantities of primary and secondary fuels consumed during the last calendar year;

~~(xi)~~10. the year in which the plant or each unit of a multi-unit plant began operation;

~~(xii)~~11. the name-plate number, kilowatt rating, power factor, voltage, phase and frequency for each unit of generating equipment in the plant.

~~(b)~~B. Future facility ~~requirements~~ additions. Each utility required to report under rule EA 204~~(a)~~A 1 shall estimate the additional

power plants or additions to existing plants necessary to provide for the energy growth predicted ~~for~~ by the ~~best estimate~~ forecasts ~~projected~~ in rules EA 206 ~~(d)~~ and 207. Each utility shall supply the following information about each additional plant or addition:

~~(i)~~ 1. 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)~~ 2. the month and year ~~in which~~ the plant is ~~predicted~~ to begin operation;

~~(iv)~~ 3. the estimated cost of the new facility at the time of construction;

~~(v)~~ 4. the estimated plant capacity of anticipated generating equipment;

~~(vi)~~ 5. the estimated total annual net kilowatt-hours generated for nonplant use by the plant operating at ~~full capacity~~ normal conditions under normal maintenance and circumstances;

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

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

6. the estimated type and amount of fuel to be used to operate the plant on an annual basis under conditions set forth in EA 208 B 5; and

~~(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.~~

7. the estimated heat rate of the plant.

C. Future facility retirements. Each utility required to report under rule EA 204 A 1 shall list any planned facility retirements that will take place within the next 15 years. Each utility shall provide the following information about each facility retirement:

1. the location and type of the plant;

2. the year the plant began operation and the year it will cease operation;

3. the plant's actual capacity;

4. the annual net kilowatt-hours the plant presently generates for nonplant use;

5. the type of primary fuel used for the plant; and

6. the present heat rate for the plant.

~~(c)~~ D. Fuel requirements and generation by fuel type

~~(i)~~ 1. Based on the data reported under rule EA ~~207(a) and (b)~~ 208 A 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 Minnesota 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)~~ 2. Each utility shall estimate the quantities of the fuel ~~listed in 207(c)(i)~~ which will be necessary for use by its Minnesota power plants ~~serving its Minnesota Service Area~~ to provide for the electrical energy growth predicted by the ~~best estimate~~ forecast projected in rules EA 206~~(b)~~ and 207. Each utility shall also estimate by fuel type the kilowatt-hours of electricity which will be produced by its Minnesota 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~~ 209 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.~~

A. Existing transmission lines. Each utility shall report the following information in regard to each transmission line over 100 kilovolts now in existence:

1. a map showing the location of each line;
2. the design voltage of each line;
3. the design power capability of each line;
4. the approximate location of D.C. terminals or A.C. substations;
5. the approximate length of each line and the portion of that length in Minnesota; and
6. the estimated losses at the design voltage and at the design current for the length of the transmission line and at the terminals or substations.

B. Transmission line additions. Each generation and transmission utility as defined in EA 202 shall report the information required in rule EA 209 A for all future transmission lines over 100 kilovolts which the utility plans to build within the next 15 years.

C. Transmission line retirements. Each generation and transmission utility as defined in EA 202 shall identify all present transmission lines over 100 kilovolts which the utility plans to retire within the next 15 years.

EA ~~209~~ 210 OTHER INFORMATION REPORTED ANNUALLY

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

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

~~(i)~~1. the 24-hour period during the summer ~~months~~ season when the kilowatt demand on the system was the greatest; and

~~(ii)~~2. the 24-hour period during the winter ~~months~~ season when the kilowatt demand on the system was the greatest;

~~(b)~~B. ~~T~~the names, ~~and~~ addresses, ~~of~~ and the kilowatt-hours of electricity consumed by ~~the 25 largest~~ customers of the utility who annually consume over 600,000 kilowatt-hours. If such a list does not include at least 15 of the utility's customers, the largest 15 shall be listed with their annual consumption of electricity;

~~(c)~~C. ~~T~~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)~~D. ~~T~~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 unless already reported pursuant to rule EA 207 B 5 and 6.

~~(e)~~E. ~~A~~ a detailed map, on which the scale is indicated, of the utility's Minnesota ~~s~~service ~~a~~area, identifying power plants, principal substations, and transmission lines over 100 kilovolts, identified by voltage;

~~(f)~~F. ~~A~~a listing of the interconnections the utility has with other utilities, including:

~~(i)~~1. the names of any such ~~system~~ utility;

~~(ii)~~2. the ~~voltage rating~~ location of the interconnection; and

~~(iii)~~3. 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.~~

G. its present rate schedule as of June 1 of the present year;

H. its sales to ultimate consumers by county annually;

I. a copy of whichever of the following reports it files with either the F.P.C. or the U.S. Department of Agriculture:

a. F.P.C. Report 12 Schedule 9 and 10;

b. F.P.C. Report 12A Schedule 3 and 4; and

c. Part D of the financial and statistical report to the United States Department of Agriculture;

J. for distribution only utilities the kilowatt-hours generated on an emergency standby basis and the amount of fuel used to generate such electricity.

EA ~~210~~ 211 QUARTERLY REPORTS OF ENERGY DELIVERED TO ULTIMATE CONSUMERS

~~(a)~~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)~~1. Geographic areas will be defined by the customer's ~~zip-code~~ county.

~~(ii)~~2. Customer class will be defined by standard industrial classification (SIC) codes with extensions for more detailed breakdown of households and governmental units.

~~(iii)~~3. In each customer class/geographic area combination the utility shall report the number of customers and the total kilowatt-hours consumed.

B. After an evaluation of data availability, the director may allow certain distribution only utilities to report only kilowatt-hours consumed by large customers who use in excess 600,000 kilowatt-hours per year by two-digit SIC code. However, the utilities given such exemption must report each quarter kilowatt-hours consumed by ultimate consumers by F.P.C. or R.E.A. end-use categories. Utilities whose sales to ultimate customers did not exceed 5 million kilowatt-hours during the past calendar year need not report.

C. 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-year-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

Upon written request by any utility, ~~T~~the director may allow ~~any utility~~ it 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.

RECEIVED
DEC 16 1976
OFFICE OF HEARING EXAMINERS

MINNESOTA ENERGY AGENCY

In the Matter of the Proposed Adoption of Amended Rules of the Minnesota Energy Agency Governing Electric Utility Information Reporting Minn. Regs. EA 201-213.)

Docket No. EA-77-004-AK

STATEMENT OF EVIDENCE

In addition to the "Statement of Need" which is available for inspection or purchase at the Office of Hearing Examiners, Room 300, 1745 University Avenue, St. Paul, Minnesota 55104, and in support thereof, the Minnesota Energy Agency will introduce the following Minnesota Energy Agency Rules Governing Contents of Applications for Certificate of Need and Criteria for Assessment of Need for Large Electric Generating Facilities and Large High Voltage Transmission Lines, Minn. Regs. EA 601-638, and the expert opinion of Daniel Quillin, Research Analyst, Minnesota Energy Agency.

We may call one or more of the following expert witnesses to testify: Dr. Richard A. Wallen, Director of the Certificate of Need Program, David L. Jacobson, Chief Energy Facility Analyst, Minnesota Energy Agency; Mr. Ronald Visness, Assistant Director for Project Coordination, Minnesota Energy Agency; Linda Limback, Project Maintenance Officer, Minnesota Energy Agency; and Phillip Jennings, Senior Programmer, Minnesota Energy Agency. The named individuals played a substantial role in developing the proposed rules and will be available to testify in support of the need for each proposed rule.

We will be citing the following statutes: Minn. Stat. Chapter 116H (especially, but not exclusively, Section 116H.10, section 116H.11).

Dated: 12/16/76

Ronald D. Visness

Ronald D. Visness
Assistant Director

State Exh. #1
1-10-76
M.K.S.

RECEIVED
DEC 16 1976
OFFICE OF HEARING
EXAMINERS

STATE OF MINNESOTA

MINNESOTA ENERGY AGENCY

In the Matter of the Proposed Amendment)
of Rules of the Minnesota Energy Agency)
Governing Electric Utility Information )
Reporting - Minn. Regs. EA 201-213 )

ORDER FOR HEARING

IT IS HEREBY ORDERED that a public hearing on the above-captioned rule amendments be held in Room D of the Veterans Service Building, 20 West 12th Street and Columbus Avenue between Wabasha and Iglehart, Saint Paul, on January 10, 1977, commencing at 9:00 a.m. and continuing until all persons have had an opportunity to be heard.

IT IS FURTHER ORDERED that a Notice of Hearing be mailed to all persons or representatives of associations or other interested groups who have registered their names with the Secretary of State for that purpose.

IT IS FURTHER ORDERED that the Notice of Hearing be published in the State Register.

Dated: November 19, 1976

John P. Millhone
Director

State's Exh. 2.
1-10-76
M.K.S.

STATE OF MINNESOTA

MINNESOTA ENERGY AGENCY

In the Matter of the Proposed Amendment)
of Rules of the Minnesota Energy Agency)
Governing Electric Utility Information )
Reporting - Minn. Regs. EA 201-213 )

NOTICE OF HEARING

NOTICE IS HEREBY GIVEN THAT a public hearing in the above-entitled matter will be held in Room D of the Veterans Service Building, 20 West 12th Street and Columbus Avenue between Wabasha and Iglehart, Saint Paul, on January 10, 1977, commencing at 9:00 a.m. and continuing until all persons have had an opportunity to be heard.

All interested or affected persons will have an opportunity to participate. Statements may be made orally or in writing at the hearing and written materials may be submitted by mail to Allan W. Klein, Hearing Examiner, Room 300, 1745 University Avenue, Saint Paul, Minnesota, 55104, telephone (612) 296-8114, either before the hearing or within 20 days after the close of the hearing.

The proposed rule amendments, if adopted, would improve, update and make more precise the reporting requirements currently imposed on electric utilities. Certain proposed rule amendments would require additional forecast data of the larger utilities to enable the director to better anticipate future state energy demands and enable him to make sensible and rational recommendations for limiting such growth. Certain other proposed rule amendments will aid the director in monitoring energy usage by the state's largest end users. Finally, certain proposed rule amendments delete present reporting requirements which were one time in nature, unnecessary in order for the Agency to fulfill its legislative mandate, overly cumbersome in nature, or duplicative of information collected by other agencies.

Copies of the proposed amended rules are now available and one free copy may be obtained by writing to the Minnesota Energy Agency, 740 American Center Building, 150 East Kellogg Boulevard, Saint Paul, Minnesota, 55101. Copies will also be available at the door on the

date of the hearing. The Agency's authority to promulgate the proposed amended rules is contained in Minn. Stat. §§ 116H.08(a) (1974). A Statement of Need presenting facts showing the need for and reasonableness of the proposed amendments and a Statement of Evidence summarizing the evidence to be presented at the hearing in support of the proposed amendments will be filed at the Office of Hearing Examiners at least 25 days prior to the hearing and will be available there for public inspection.

Please be advised that pursuant to Minn. Stat. §§ 10A.01 subd.11 (1974) any individual engaged for pay or other consideration for the purpose of representing persons or associations attempting to influence administrative action, such as the promulgation of these rule amendments, must register with the State Ethical Practices Board, 410 State Office Building, Saint Paul, Minnesota, as a lobbyist within five days of the commencement of such activity by the individual.

Dated: November 19, 1976

John P. Millhone
Director

State's Exh. 3
1-10-76
M.K.S.

STATE OF MINNESOTA

MINNESOTA ENERGY AGENCY

| | | |
|---|---|---|
| In the Matter of the Proposed Adoption of Rules of the Minnesota Energy Agency Governing Electric Utility Information Reporting - Minn. Regs. EA 201-213 | ) ) ) ) ) | Docket No. EA-77-004-AK<br>AFFIDAVIT OF MAILING |

Daniel L. Quillin, being first duly sworn on oath, deposes and says:

That on the ninth day of December, 1976, 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 a true and correct copy thereof, properly enveloped, with first class postage prepaid, to all persons and associations at the addresses listed in the attached Certificate of the Secretary of State.

Daniel Quillin

Subscribed and sworn to before me
this 15th day of December, 1976

Susan K. Riedinger
Notary Public

SUSAN K. RIEDINGER
Notary Public, Ramsey Co., Minn.
My Commission Expires
Dec. 7, 1982

State's Exh. 5
1-10-77
M.R.S.

STATE OF MINNESOTA

MINNESOTA ENERGY AGENCY

| | | |
|---|---|---|
| In the Matter of the Proposed Adoption of Rules of the Minnesota Energy Agency Governing Electric Utility Information Reporting - Minn. Regs. EA 201-213 | ) ) ) ) ) | Docket No. EA-77-004-AK<br><br>AFFIDAVIT OF RECEIPT OF THE SECRETARY OF STATE'S MAILING LIST |

Daniel L. Quillin, being first duly sworn upon oath, deposes and says:

1) That he is an employee of the Minnesota Energy Agency of the State of Minnesota.

2) That on the 7th day of December, 1976, he made of the Office of the Secretary of State of the State of Minnesota a request for 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 Minn. State §§ 15.0412 (Supp. 1975).

3) That on the 9th day of December, 1976, 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 herein.

Further Affiant sayeth not.

Daniel Quillin

Subscribed and sworn to before me
this 15th day of December, 1976.

Susan K. Riedinger
Notary Public

SUSAN K. RIEDINGER
Notary Public, Ramsey Co., Minn.
My Commission Expires
Dec. 7, 1982

5

1-10-76
M.K.S.

STATE OF MINNESOTA

MINNESOTA ENERGY AGENCY

| | | |
|---|---|---|
| In the Matter of the Proposed Adoption of Rules of the Minnesota Energy Agency Governing Electric Utility Information Reporting - Minn. Regs. EA 201-213 | ) ) ) ) ) ) | CERTIFICATE OF DELIVERY SECRETARY OF STATE LIST |

502 labels +

I hereby certify that the attached one sheets constitute the complete list of persons, associations, and interested groups who as of 3:30 o'clock P M., this 9th day of December, 1976, 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

SECRETARY OF STATE
Joan Anderson Growe

By Gail Dion

4

Ashrae Energy Conservation Comm.,Att:E.H.Bartels, 733 Marquette Ave.,Mpls.5540

State's Exh. 6
1-10-77
M.K.S.

Drawz, John E., 1100 First Nat'l Bk Bldg., Mpls. 55402

Miller, Alvin, %Hussmann North Central, 6100 Wayzata Blvd,Mpls. 55416

Pooler, Albert L., Minn. Gas Co., 733 Marq.Ave., Mpls.,MN. 55402

Sievert, Sandra J., Industrial Coatings, Inc., RT. 2 Box 63C Rogers,Mn. 5537

Simonson Cashway Co., Att: Glenn Lahm, 535 First St. N.E. St. Cloud 56301
Tegan, James, Brin Glass Co., 600 Washington Ave. N., Mpls. 55401

McClurg, Eunice
1061 109th Avenue N.E.
Blaine, Minnesota 55434

AM INST PROF GEOLOGISTS
2201 PRINCETON AVE
ST PAUL MN
55105

ANDERSON HAROLD
BOX 3047
MANKATO MN
56001

ANDREW MARK STATE SENATE
235 STATE CAPITOL
ST PAUL MN
55155

ARROWHEAD REG. DEV COMM.
211 W 2ND ST
DULUTH MN
55802

ASSOCIATED GEN CONTROF MN
48 E 8TH STREET
ST PAUL MN
55101

ALBERT,AA CALDER CORP
366 JACKSON ST
ST PAUL MN
55101

ANCHOR BLOCK COMPANY
PO BOX 3360
ST PAUL MN
55165

ANDERSON JAMES
7703 NORMANDALE RD
MPLS MN
55435

ANTHONY DICK WDSM RADIO
230 E SUPR ST
DULUTH MN
55102

ARROWHEAD REGIONAL DEV COMM
200 ARROWHEAD PLACE
DULUTH MN
55802

ASSN OF MINN COUNTIES
55 SHERBURNE AVE #203
ST PAUL MN
55103

BABCOCK LOCHER NELSON ET AL
118 E MAIN ST
ANOKA MN
55303

ALLEND
220 GR
MPLS
55415

ANDERS
951 E
MPLS
55414

ANDERS
4425 R
EDINA
55436

ANTI-T
160 ST
ST PAU
55155

ARVER
2467 C
ST PAU
55113

ASSN F
459 R
ST PAU
55103

BADAL
2025
SO ST
55075

ALLENDORF MARSHALL
[illegible] GRAIN EX 400 S 4TH
MPLS MN
55415

ANDERSON GRAHAM
951 E HENN
MPLS MN
55414

ANDERSON MARY
4425 RUTLEDGE AVE
EDINA MN
55436

ANTI-TRUST DIV.ATTY GEN.
160 STATE OFF BLDG
ST PAUL MN
55155

OHM — ARTER JOHN A
[illegible]
[illegible] MN
[illegible]

ASSN RESIDENCES FOR RETARDED
[illegible] NICE SUITE 301
ST PAUL MN
55103

AL — BADALICH JOHN P
2225 THOMPSON AVE
SO ST PAUL MN
55075

AMER CAMPING ASSN
3639-21/2 ST N.E.
MPLS MN
55418

ANDERSON HERBERT
418 8TH ST. SO.
VIRGINIA MN
55792

ANDERSON STANFORD P
14600 MINNETONKA BLVD
MINNETONKA MN
55343

ARNOLD ROBERT MESPA
41 SHERBURNE
ST PAUL MN
55103

ASMUSSEN,DENNIS,MPIRG
3036 UNIV AVE SE
MPLS MN
55414

AUTOMOBILE MFRS ASSN INC
55 SHERBURNE AVE
ST PAUL MN
55103

BARRETT FRED
ST LOUIS CO COURT HOUSE
DULUTH MN

BARTHOLOW HAROLD E FIRE CHF
2600 109 AVE N W
COON RAPIDS MN
55433

BATES DENNIS
446 STATE OFF BLDG
ST PAUL MN
55155

BEGALKA D REV
212 N ELK ST
BELLE PLAINE MN
56011

BEMIDJI STATE COLLEGE
PLACEMENT BUR. J.C. BRADY
BEMIDJI MN
56601

BERGSETH THOMAS
1011 NICOLLET MALL
MPLS MN
55403

BERGUSON & LOFGREN
MN GAS 700 LINDEN W
MPLS MN
55403

BLADIN PAPER CO W J LICKE
115 1ST ST SW
GRAND RAPIDS MN
55744

BLOMQUIST BARRY L

NORTH BRANCH MN
55056

BOWMAN & BRUNS ATTN P MASON
1616 PIONEER BLDG
ST PAUL MN
55101

BREHL JAMES W
332 HAMM BLDG
ST PAUL MN
55102

BRIGHAM E M III
RR4
RED WING MN
55066

BROEKER JOHN
2850METRO DR. SUITE 504
BLOOMINGTON MN
55420

BROWN H D
4961 KINGSBERRY LANE
MINNETONKA MN
55343

BRUBACHER RICHARD COMM ADM
208 ADM BLDG
ST PAUL MN
55101

BUCHHOLTZ CHARLES
5044 BRENT AVE E
INV GRV HTS MN
55075

BURGER ALBERT
600 DEGREE OF HONOR BLD
ST PAUL MN
55101

CABLE COMM SYST-H SARRAZIN
BOX 777
HECTOR MN
55342

CARLSON CARL L
7516 80TH ST S
COTTAGE GROVE MN
55016

CARLSON VERNE E
BOX 755 CITY HALL
WILLMAR MN
56201

CENTRAL MN REG DEV COMM
1139 FRANKLIN AVE
SAUK RAPIDS MN
56379

CHERCHES CHRIS CITY MGR
5005 MTKA BLVD
ST LOUIS PARK MN
55416

CHRISTIAN SCI COMM ON PUB
1821 UNIV AVE SUITE 271
ST PAUL MN
55104

BECK PAT
953 HYACINTH AVE
ST PAUL MN
55106

BEECHER EVERETT
10 10 1ST ST SO
HOPKINS MN

BENSONI PETER USW OF AM.
609 PROVIDENCE BLDG.
DULUTH MN

BERGERUD ALF
300 ROANOKE BLDG
MPLS MN
55402

BEST FLANAGAN ET AL
4040 IDS CENTER
MPLS MN
55402

BEUTEL ROBERT
2200 SILVER LAKE RD
NEW BRIGHTON MN
55112

BLOOMINGTON CITY CLERK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

BOLTON MALCOLM
422 ALDRICH AVE NO
MPLS MN
55405

BRICK PHILIP D
807 SELLWOOD BLDG
DULUTH MN
55802

BRIGGS & MORGAN - B F FRI
2200 W 1ST NATL BK BLDG
ST PAUL MN
55101

BROOKS WILLIAM F JR
854 MIDLAND BK BLDG
MPLS MN
55401

BROWN D M GOODRIDGE PUB S
IND DIST #561
GOODRIDGE MN
56725

BRUNING C.R.DEPT.CLINIC.EXP.
BURTON HALL
MPLS. MN
55455

BUSCH NOEL
SUITE 705 510 MARQUETTE
MPLS MN
55402

BUR.ENGR.IND.DIV. MR.KIBIGER
219 N. 2ND ST.
MPLS. MN

BUR NATL AFFAIRS INC
1231 25TH ST NW
WASHINGTON DC
20037

CAIN RUTH
730 E 38TH ST
MPLS MN
55407

CAIRNS JOHN A
47TH FLR IDS CENTER
MPLS MN
55402

CARRISON DALE K
MANKATO STATE COLLEGE
MANKATO MN
56001

CARTER LOCEY & ASSOC
2353 N RIDE ST
ST PAUL MN
55113

CHAMBER OF COMMERCE
30 SO 1ST AVE EAST
ELY MN
55731

CHAMBERLAIN JOHN L
PO BOX 241
MPLS MN
55440

CHRISTIANSEN FREDRIK
RM 505 CAPITOL SQ BLDG
ST PAUL MN
55155

CHRYSALIS CENTER FOR WOME
2104 STEVENS AVE S
MPLS MN
55404

CITY CLERK
386 CITY HALL
ST PAUL MN
55102

CITIZENS LEAGUE
530 SYNDICATE BLDG
MPLS MN
55402

CITY
C LAR
ROBBI
55422

CLAUSEN PHILLIP
2307 STANDISH ST
ST PAUL MN
55108

CLAWSON CONNIE
HELP CT 317-17TH AV SE
MPLS MN

COLEM
208 S
ST PA
55155

COMMUNITY DESIGN CENTER
118 E 26TH ST
MPLS MN
55404

CONCORDIA COLLEGE
DEAN
MOORHEAD MN
56560

CONSU
5TH F
ST PA
5510I

CRAVEN NORMAN
10637 THOMAS AVE S
BLOOMINGTON MN
55431

CROW WING CO PLANNING & ADV
COURT HOUSE
BRAINERD MN
56401

CUSHM
700 N
MPLS
55402

DAHLKE LOIS M
118 S EAGLE ST
BELLE PLAINE MN
56011

DAILEY THOMAS ECONOMICS LAB
370 WABASHA ST
ST PAUL MN
55102

DANKE
1200
RED W
55066

DAYTON CHAS SIERRA CLUB
800 MIDLAND BANK BLDG
MPLS MN
55401

DEVELOP DISABILITIES PROGRAM
STATE PLAN 101 CAP SQ
ST PAUL MN
55155

DICKI
BOX 1
MARSH
56258

DISPATCH PIONEER PRESS
PRESS RM STATE CAPITOL
ST PAUL MN
55101

DORSEY MARQUART
2400 1ST NATL BANK BLDG
MPLS MN
55402

DOUGL
2212
ST PA
55102

DUDLEY E H
RT 7 BOX 122
EXCELSIOR MN
55331

DUNN OLIVER PLUMBERS LOC 15
708 SO 10TH ST
MPLS MN
55404

DZUGA
421 W
ST PA
55102

E CENTRAL REG. DEV. COMM
COURTHOUSE 18 N VINE ST
MORA MN
55051

EBELING EDWARD H.
161 W. MAIN
PERHAM MN
56573

EICHT
3794
WHITE
55110

ELDRED R W ARMOUR & CO
UNION STOCK YARDS
SO ST PAUL MN
55075

ELMER EDWIN W
2901 PLEASANT AVE
MPLS MN
55408

EMERI
1908
MPLS
55402

ENNIS A F BOISE CASCADE
PO BOX 713
INTL FALLS MN
56649

ENV SERV-GEN RESOURCE CORP
6340 INDUSTRIAL DR
HOPKINS MN
55343

ERDMA
701 N
MPLS
55441

ESSE KENNETH
4801 W 50TH ST
EDINA MN
55424

ETHICS COMM
RM 410 STATE OFF BLDG
ST PAUL MN
55155

EVANS
ENGEL
NEW J

CITY OF ROBBINSDALE
C LARSON 4221 LAKE RD
ROBBINSDALE MN
55422

CLARKSON J.B.
2350 I.D.S. CENTER
MINNEAPOLIS MN
55402

COLEMAN NICHOLAS
208 STATE CAPITOL
ST PAUL MN
55155

COLLIN LAURENCE
RT 2
ISANTI MN
55040

CONSUMER SERVICES DEPT COMM
5TH FLR METRO SQ BLDG
ST PAUL MN
55101

COUNTY ATTYS COUNCIL
95 SHERBURNE AVE S203
ST PAUL MN
55103

ADV

CUSHMAN J S DAYTON HUDSON
700 NICOLLET MALL
MPLS MN
55402

LAB

DANKERS, KENNETH
1200 WEST FOURTH STREET
RED WING MN
55066

DANIELSON RODNEY L
418 AUDITORIUM
ST PAUL MN
55102

GRAM

DICKINSON MRS JOANNE
BOX 1065
MARSHALL MN
56258

DIEHL JOHN
26 KENWOOD PKWY
ST PAUL MN
55105

DOUGLAS BELL ET AL
2212 AM.NATL BK BLDG
ST PAUL MN
55102

DOW CHEMICAL
47 BLDG
MIDLAND MI
48640

15

DZUGAN KEN ST PAUL PLANNING
421 WABASHA ST
ST PAUL MN
55102

EICHTEN DANIEL
3794 HAZEL
WHITE BEAR LK MN
55110

ELDER DR JAMES B
11140 WASHBURN AVE SO
BLOOMINGTON MN
55431

EMERICK RICHARD A
1908 IDS CENTER
MPLS MN
55402

ENGELBRECHT DOUGLAS
809 RANGE ST
NO MANKATO MN
56001

P

ERDMAN ROGER TENNANT CO
701 N LILAC DR
MPLS MN
55441

ERNEST K LEHMANN & ASSOC.
1409 WILLOW ST.
MPLS MN
55403

EVANS CHAS.L. PRENTICE-HALL
ENGELWOOD CLIFFS
NEW JERSEY

EWALD DOUGLAS MINN HOSP A
2333 UNIV AVE SE
MPLS MN
55414

EWING MRS WM
42 ASTAR RD
BABBITT MN
55706

FARRELL FRANK BUR NOR
RM 1180 176 E 5TH ST
ST PAUL MN
55101

FELHABER R S
W 1ST NATL BANK BLDG
ST PAUL MN
55101

FINNEGAN J.R.
55 E. 4TH
ST.PAUL MN
55101

FITZGERALD DR BOB
3007 LYNDALE AVE SO
MPLS MN
55408

FORBES GORDON MINN RRS ASSN
203 HANOVER 480 CEDAR
ST PAUL MN
55101

FORSBERG AGR SERV
518 SUMMIT AVE
NEW ULM MN
56073

FREDIN CONRAD M
811 FIRST NATL BK BLDG
DULUTH MN
55802

FREDLUND MRS PHYLLIS
RR 4 BOX 37
CANBY MN
56220

GALVIN M J JR
W2162 1ST NATL BK BLDG
ST PAUL MN
55101

GEO A HORMEL & CO LAW DEPT
PO BOX 800
AUSTIN MN
55912

GIEL DAVID
RM B-28 STATE CAPITOL
ST PAUL MN
55155

GODIN RALPH J
3824 47TH AVE SO
MPLS MN
55406

GOODMAN DF TEL CABLE TV
302 E SUPERIOR
DULUTH MN
55802

GREATER MET AREA HOSPITALITY
5152 CEDAR AVE S
MPLS MN
55417

GREEN DEL CITY MGR
BLOOMINGTON CITY HALL
BLOOMINGTON MN
55431

GRUMMERT REV DONALD
1435 ADAMS ST
MPLS MN
55413

GUSTAFSON DAN-LABOR TEMPLE
312 CENTRAL
MPLS MN
55414

H B FULLER CO
2400 KASOTA AVE
ST PAUL MN
55108

HAFNER DR A J
BOX393 MAYO U OF M
MPLS MN
55455

HAROLD J WESTIN CONSTRUCTORS
45 E 8TH ST
ST PAUL MN
55101

HALLBERG LEE & MCCABE
4927 34TH AVE S
MPLS MN
55417

FAEGRE & BENSON ATTN LIBR
1300 NW BANK BLDG
MPLS MN
55402

FARMERS ELEVATOR ASSN
852 GRAIN EXCH BLDG
MPLS MN
55415

FILTER LOREN
BOX 36
BRITT MN
55701

FINLEY JAMES F
920 MINN BLDG
ST PAUL MN
55101

FLEMING FREDERICK A
1860 HIGHLAND PARKWAY
ST PAUL MN
55116

FLADLAND CLINT MN L&P BUR
795 RAYMOND AVE
ST PAUL MN
55114

FOX W.E. LINDQUIST & VENNUM
4200 IDSCTR 80 S.8TH ST
MINNEAPOLIS MN
55402

FRANKLIN ROBERT B MPLS TR
426 PORTLAND
MPLS MN
55415

FREDRIKSON BYRON ET AL
47TH FLR IDS CENTER M
PLS MN
55402

FRISON FRANK NECA
RM 305 200 SO ROBERT
ST PAUL MN
55107

GARDNER HDW - R A JOHNSON
515 WASHINGTON AVE N
MPLS MN
55401

GEBERT K L
220 GRAIN EXCH
MPLS MN
55415

GLEESON MICHAEL
909 SOC SC BLDG U OF M
MPLS MN
55455

GLEN. HILLS HOSP.R.VAN HA
3901 GOLDEN VALLEY RD.
MPLS. MN
55422

GRAHAM THOS H
854 MIDLAND BK BLDG
MPLS MN
55401

GRANATH MARVIN -HONEYWELL
2701 4TH AVE SO
MPLS MN
55408

GREEN GARY J
41 SHERBURNE AVE
ST PAUL MN
55102

GREEN JANET
9773 N SHORE DR
DULUTH MN
55804

GUSTAFSON WALLACE
BOX 567
WILLMAR MN
56201

HANFT PHILIP M
1200 ALWORTH BLDG
DULUTH MN
55802

HANSON ETHEL
2813 85TH AVE N
MPLS MN
55444

HAUN DR J W GEN MILLS
PO BOX 1113
MPLS MN
55440

HAYES, THOMAS W
700 SELLWOOD BLG
DULUTH MN
55812

HEALTH MANPOWER C LARSON
717 DELAWARE ST SE
MPLS MN
55440

HEAD & TRUHN
1007 SOO LINE BLDG
MPLS MN
55402

HEIM PAUL M
3944 IDS CENTER 80 S 8
MPLS MN
55402

HENDRICKSON A WM
100 FREEMAN DRIVE
ST PETER MN
56082

HOLDAHL SCOTT
380 N BLDG GRAIN EXCH
MPLS MN
55415

HORNER WALDORF - KAZIUKEWICZ
PO BOX 3260
ST PAUL MN
55165

HUMAN RIGHTS
200 CAPITOL SQ BLDG
ST PAUL MN
55101

HYDROLOGIST
CHIPPEWA NATL FOREST
CASS LAKE MN
56633

INGEBRIGTSEN DR K H
23 SE 4TH ST
MPLS MN
55414

IUOE LOC 49 CHAS SWENSON
2580 UNIV AVE
ST PAUL MN
55101

JACKMAN DONALD G
4023 E LAKE ST
MPLS MN
55406

JENSEN CARL A
127 E MAIN ST
SLEEPY EYE MN
56085

HART PATRICK V
112 E LIBERTY BOX 3271
MANKATO MN
56001

HEADWATERS REG DEV. COMM
BOX 584 MENTAL HEALTH
BEMIDJI MN
56601

HEINTZ MARY ELLEN
PO BOX 599
CINCINNATI OH
45201

HENDRICKSON MRS VIRGINIA
3324 COUNTRY WOOD DR
BURNSVILLE MN
55337

HOLEY GEO AERONAUTICS
DOWNTOWN AIRPORT
ST PAUL MN
55107

HOULE MELVIN
881 W HWY 96
SHOREVIEW MN
55112

HUMAN SERVICES
414 LAFFAYETTE RD 5THFL
ST PAUL MN
55101

HYLAND DEAN
1501 W 50TH ST
MPLS MN
55419

INGVALSON VERN MN.FARM BUR.
3110 WOODDALE DR PO 337
OST PAUL MN
55165

IVERSON DR JOS DEPT ED
ST OLAF COLLEGE
NORTHFIELD MN
55057

JAIN NIRMAL ENIV PROCESS
1220 GLENWOOD AVE
MPLS MN
55405

JENSEN MRS GAYNOLD
111 WEST 107TH ST
MPLS MN
55420

HARTFELDT WILL
434 HAMM BLDG
ST PAUL MN
55102

HAVEN ROBT TWIN TN TREATM
1706 UNIV AVE
ST PAUL MN
55104

HEANEY BILL
30 W SUPERIOR ST
DULUTH MN
55802

HEARING EX.OFF. M GREENBE
1745 UNIV AVE
ST PAUL MN
55104

HEISENFELT WM
BOX 516
BEMIDJI MN
56601

HELTZER JAMES DAYTON HUDS
777 NICOLLET MALL
MPLS MN
55402

HILL JIM ASSOC.MILK PROD.
7850 METRO PARKWAY
MINNEAPOLIS MN
55420

HINRICHSEN PATRICK
MANKATO FREE PRESS
MANKATO MN
56001

HOLMES EUSTIS ET AL
4610 IDS CENTER
MPLS MN
55402

HOPKINS WM.B. DIR.MISCCA
3915 GOLDEN VALLEY ROAD
GOLDEN VALLEY MN
55422

HOUSE APPROPRIATIONS COMM
RM 109 STATE CAPITOL
ST PAUL MN
55101

HULSTRAND ANDERSON & LARS
PO BOX 130
WILLMAR MN
56201

HUSEBYE, CRAIG J.
5036 FRANCE S.
EDINA MN
55410

HUTCHISON R.M. ANOKA CO.C
COURT HOUSE
ANOKA MN
55303

ILLINGWORTH ROBERT C
6750 FRANCE AVE S RM290
MPLS MN

INS FED OF MINN
902 SOO LINE BLDG
MPLS MN
55402

INTERSTATE POWER RW STEEL
1000 MAIN ST
DUBUQUE IA
52001

IZAAK WALTON MN DIV
111 E FRANKLIN RM-210
MPLS MN
55404

JENOS INC
525 LAKE AVE SO
DULUTH MN
55801

JENSEN ARTHUR,CITY CLK
2215 W OLD SHAKOPEE RD
BLOOMINGTON MN
55431

JOHANSEN BUS SERV INC
19 DAYTON RD
CHAMPLIN MN
55316

JOHNSON & SANDERSON
ST MARYS HOSPITAL
ROCHESTER MN
55901

JOHNSON CLARENCE IBEW LU 292
3615 37TH AVE S
MPLS MN
55406

JOHNSON G ROBERT
4344 IDS CENTER
MPLS MN
55402

JOHNSON LANCE J
265 S LAFAYETTE RD
ST PAUL MN
55107

KEABLE MIKE
909 6TH AVE N
ST CLOUD MN
56301

KEENAN RICHARD J
4444 IDS BLDG
MPLS MN
55402

KJERVIK DIANE
4302 POWEL HALL U OF M
MPLS MN

KLOSTER MARION PEAVEY CO
730 2ND AVE S
MPLS MN
55402

KNOPP TIMOTHY
COLLEGE FORESTRY U OF M
ST PAUL MN
55108

KNUTSON DR KEITH,BIOLOGY DPT
ST CLOUD STATE
ST CLOUD MN
56301

KOLLER MR & MRS ERWIN A
1568 DULUTH ST
ST PAUL MN
55108

KOPP MRS VERNON
2050 65TH ST E
INVER GR HGHT MN
55075

KRONLOKKEN J E
10048 NORD RD
BLOOMINGTON MN
55437

KROON H CLIFTON
210 E WALNUT
MANKATO MN
56001

LABELLE JUANITA MRS
5816 AQUILA AVE NO
NEW HOPE MN
55428

LANGVIN DAVID
7500 80TH ST S
COTTAGE GROVE MN
55016

LANSING & OAKES
400 SIBLEY ST
ST PAUL MN
55101

LARSON HANS P DIV HOSP SERV
717 DELAWARE ST SE
MPLS MN
55440

LEAGUE MN MUNIC
300 HANOVER 480 CEDAR
ST PAUL MN
55101

LEWIS DR.G.M JR.
ABBOTT 110 E 18TH ST
MPLS MN
55403

LIBBEY LEONARD
BOX 17011 NOKOMIS STA
MPLS MN
55417

LOOS CALVIN J
6809 LYNDALE AVE SO
MPLS MN
55423

LOWE DOUG
2701 N LEXINGTON AVE
ROSEVILLE MN
55113

JOHNSON LEROY
9939 BLUEBIRD ST NW
COON RAPIDS MN
55433

JOHNSON M.D. FRUNDT & FRU
BLUE EARTH MN
56013

KABLE RICHARD W
BETHEL MN
55006

KAVANEY RICHARD
1220 NORTHERN FED BLDG
ST PAUL MN
55102

KEILY DANILE
3549 V2 PLEASANT AVE
MPLS MN
55408

KIMBALL ROBERT
647 CAPITOL SQ BLDG
ST PAUL MN
55101

KLUZ STEVEN J
1910 1ST NATL BK BLDG
MPLS MN
55402

KNAPP J A
RM 3 CAPITOL
ST PAUL MN
55155

)PT

KNUTSON R N GRANNIS ETAL
F J SCHULT BLDG
ST ST PAUL MN
55075

KNVDSON ROBT
4375 BROWNDALE AVE
MPLS MN
55424

KRAMER ERNEST W
717 DELAWARE ST SE
MPLS MN
55440

KROEGER CHARLES
122 NW 7TH STREET
FARIBAULT MN
55021

KUHL CARL
4421 4TH ST NE
COL HEIGHTS MN
55421

KVB ENGINEERING INC
600 S CO RD 18
MPLS MN
55426

LAKE SUPERIOR INDUSTRIAL BUR
828 FIRST AM. BK. BLDG.
DULUTH MN
55802

LANAHAN E F - SIBLEY CO
184 E 6TH ST
ST PAUL MN
55101

LAPP LAZAR LAURIE ET AL
1200 BUILDERS EXCHANGE
MINNEAPOLIS MN
55402

LARSON C L
3800 MINNEHAHA AVE SO
MPLS MN
55406

LEAGUE WOMEN VOTERS OF MINN
555 WABASHA
ST PAUL MN
55102

LEG.REF.LIB-Z. DEWITT
RM 111 STATE CAPITOL
ST PAUL MN
55155

LINDALL & JONATHAN DEVELOP.
VILLAGE ONE CENTER
CHASKA MN
55318

LOCKNER GARY
R R 1 BOX 23
BAUDETTE MN
56623

LUTH SOC SERVICE OF MN
2414 PARK AVE
MPLS MN
55404

LYNCH DONALD SIBLEY CO
184 E 6TH ST
ST PAUL MN
55102

MANKATO STATE STUDENT ASSN
BOX 58 MANKATO COLLEGE
MANKATO MN
56001

MANSFIELD LARRY HCARC
1800 CHICAGO AVE S
MPLS MN
55404

MASTOR & MATTSON LTD
315 PEAVEY BLDG
MPLS MN
55402

MAUL WARREN E
320 S 4TH ST
MPLS MN
55415

MCFADDEN G H DISPATCH-PRESS
55 E 4TH ST
ST PAUL MN
55101

MCKIBBON MRS SHIRLEY
11 EVERGREEN LN
BABBITT MN
55706

MET. WASTE CONTOL COMM.
350 METRO SQ BLG
ST PAUL MN
55101

MEIEROTTO, JOAN
1794 SO LEXINGTON
ST PAUL MN
55118

MEYER HERBERT
10824 ZENITH AVE S
BLOOMINGTON MN
55431

MEYERLE KATHLEEN
1528 GRAND AVE APT 4
ST PAUL MN
55105

MILLER RICHARD A
1020 PLYMOUTH BLDG
MPLS MN
55402

MILLER TOM
2311 PILLSBURY AVE S
MPLS MN
55404

MINN ASSN COOPERATIVES
55 SHERBURNE AVE
ST PAUL MN
55103

MINN ASSN ELEC COOPERATIVES
4901 W 77TH ST
MPLS MN
55435

MINN ASSN WATERSHED DIST'S

ADA MN
56510

MINN AUTOMOBILE DEALERS ASSN
GRIGGS MIDWAY BLDG
ST PAUL MN
55104

MINN COMMUNITY DEVELOP SERV
512 ROSSMOR BLDG
ST PAUL MN
55101

MINN COUNCIL STATE EMP NO 6
475 RICE ST
ST PAUL MN
55103

MINN FOOD RETAILERS ASSN
555 WABASHA
ST PAUL MN
55101

MINN GOV ENG COUNCIL
2400 SHERWOOD HILL RD
MINNETONKA MN
55343

MINN HOUSING INST N T CARTER
7801 METRO PKWY
MPLS MN
55420

MINN HWYS MANAGEMENT SERVICE
407 HWY BLDG
ST PAUL MN
55101

MALONE E I COMM LABOR & INDU
444 LAFAYETTE RD 5TH FL
ST PAUL MN
55101

MANKATO STAT STUDENT SENA
CENTENNIAL STUDENT UN
MANKATO MN
56001

MANTHEY T J PICKANDS MATHER
1100 SUPERIOR AVE
CLEVELAND OH
44114

MARRINAN MARGARET M
1117 COMMERCE BLDG
ST PAUL MN
55101

MAYO FOUNDATION G ORWOLL
200 FIRST AVE NW
ROCHESTER MN
55901

MCDONALD PHILIP M
2077 SELBY AVE
ST PAUL MN
55104

MCLELLAN LARKIN
215 ADM BLDG ST CAPITOL
ST PAUL MN
55101

MECCA
867 GRAND AVE
ST PAUL MN
55105

MET TFR MEN ASSN A ROSENTHAL
1821 UNIV AVE
ST PAUL MN
55104

METROPOLITAN COUNCIL LIBR
300 METRO SQUARE
ST PAUL MN
55155

MIDLAND GLASS-HD SPURLING
PO BOX 69
SHAKOPEE MN
55379

MILLER PAUL J PHARMACY SE
ST MARYS HOSP
ROCHESTER MN
55901

MINN APT ASSN
GRIGGS-MIDWAY BLDG
ST PAUL MN
55104

MINN ASPHALT PAVEMENT ASS
555 WABASHA RM 209
ST PAUL MN
55102

MINN. ASSN. PET RETAILERS
1115 2ND AVE. SO.
MINNEAPOLIS MN
55403

MINN ASSN VOL SOC SERVICE
1821 UNIV SUITE 389
ST PAUL MN
55114

MINN CHAP ASSOC BLDRS-CONTRS
7204 W 27TH ST
MPLS MN
55426

MINN COMM FOR HANDICAPPED
METRO SQ 492 7TH & ROBT
ST PAUL MN
55101

MINN DEPT HEALTH J C MCKASY
717 DELAWARE S E
MPLS MN
55440

MINN FARMERS UNION PRES O
1275 UNIV AVE
ST PAUL MN
55104

MINN HEREFORD-LJ SCHAFER

BUFFALO LAKE MN
55314

MINN. HOTEL & MTR. ASSN
2001 UNIVERSITY AVE
ST PAUL MN

MINN LAND USE COMMITTEE
4344 IDS CENTER
MPLS MN
55402

MINN LP GAS ASSN
7515 WAYZATA BLVD 106
MPLS MN
55426

MINNE MINE CREDIT UNION
3000 HUDSON PK S 100
ST PAUL MN
55119

MINN POULTRY & HATCHERY ASSN
BOX 158
MADELIA MN
56062

MINN RETAIL HARDWARE ASSN
3033 EXCELSIOR BLVD 313
MPLS MN
55416

MINN STATE BD PHARMACY
717 DELAWARE ST SE #351
MPLS MN
55414

MINN TBR PRODUCERS ASSN
200 CHRISTIE BLDG
DULUTH MN
55802

MINN-WISC BOUNDARY AREA COMM
600 2ND ST
HUDSON WI
54016

MN ELECTRICAL ASSN
3100 HUMBOLT SO
MPLS MN
55408

MOFFITT R C
RM 301 M MPLS CITYHALL
MPLS MN
55415

MPLS ASSN RETARDED CITIZENS
3100 W LAKE ST
MPLS MN
55416

MT OLIVET ROLLING ACRES
R 1 BOX 576
EXCELSIOR MN
55331

NATL CAR RENTAL ATT D MITZEL
5501 GREEN VALLEY DR
MPLS MN
55437

NCEC INC C/O DR DAHLBERG
CONCORDIA COLLEGE
MOORHEAD MN
56560

MINN.MTR.TRANSP. .J.N.DENN
1821 UNIV.
ST.PAUL MN
55104

MN REP STATE CENTRAL COMM
555 WABASHA AVE
ST PAUL MN
55102

MINN SOCIETY ARCHITECTS AIA
NW NATL BK BLDG
ST PAUL MN
55101

MINN STATE MED ASSN
375 JACKSON ST
ST PAUL MN
55101

MINN.TURKEY GROWERS ASSN
2383 UNIV AVE
ST PAUL MN
55114

MN. ASN.C&IND H.D.PETERSON
480 CEDAR ST.
ST.PAUL MN
55101

MN PUB INT RESEARCH GROUP
3036 UNIV AVE SE
MPLS MN
55414

MOOD R BLOOMINGTON HLTH DEPT
10200 PENN SO
BLOOMINGTON MN
55431

MPLS CITY ATTORNEY
325M CITY HALL
MPLS MN
55415

MURPHY DIANA E
4200 IDS-LINDQUIST VENN
MPLS MN
55402

NATL COUNCIL JEWISH WOMEN
4330 CEDAR LK RD
MPLS MN
55416

NEDELL HAROLD - MEINEKE
6300 W LOOP S SUITE 200
BELLAIRE TX
77401

MINN PETROLEUM COUNCIL
1020 NORTHERN FED BLDG
ST PAUL MN
55102

MINN POLLUTION CONTROL AG
1935 W CO RD B2
ROSEVILLE MN
55113

MINN RESTAURANT ASSN
2001 UNIVERSITY AVE.
ST PAUL MN
55104

MINN RETAIL FED INS
131 METRO SP
ST PAUL MN
55101

MINN SOC CERTIFIED PUB ACCTS
1102 WESLEY TEMPLE BLDG
MPLS MN
55403

MINN STATE BAR ASSN
100 MINN FED BLDG
MPLS MN
55402

MINN STATE RETIREMENT SYSTEM
529 JACKSON ST
ST PAUL MN
55101

MINN TEAMSTERS CREDIT UNI
2021 HENN AVE E
MPLS MN
55413

MINN VETERANS MED ASSN
2175 W HWY 36
ROSEVILLE MN
55113

MINN WATER RESOURCES BD
RM 206 555 WABASHA ST
ST PAUL MN
55102

MN AFL-CIO L.O. LASHOMB
175 AURORA
ST PAUL MN
55103

MN.BD OF NURSING
717 DELAWARE ST SE
MPLS MN
55414

MN SOC SERV ASS J HOOD
614 PORTLAND
ST PAUL MN
55102

MN STATE SER BLIND-K NATA
1745 UNIVERSITY AVE
ST PAUL MN
55104

MORTON BUILDINGS INC
R #1
FOLEY MN
56329

MPIRG
BOX 45 ST MARYS COLLEGE
WINONA MN
55987

MPLS STAR PRESS ROOM
STATE CAPITOL
ST PAUL MN
55101

MPLS TRIBUNE CITY DESK
425 PORTLAND AVE
MPLS MN
55415

NASS GEO V HENN CO GEN HO
5TH AND PORTLAND AVE
MPLS MN
55415

NATL FAMILY INS CO
2147 UNIV AVE
ST PAUL MN
55114

NAT'L SOLID WASTES-R. GRA
1730 RHODE ISLAND AV.NW
WASHINGTON DC
20036

NEREN MADONNA
376 NEAL AVE S
AFTON MN
55001

NEUMAN RALPH W
RT 2 BOX 125
EMBARRASS MN
55732

NIELSEN STOCK & BLACKBURN
415 730 BLDG
MPLS MN

NO SUB MONTESSORI-S SADDLER
2487 HELEN COURT
NO ST PAUL MN
55109

NW COUNTRY ELEVATOR ASSN
802 GRAIN EXCH BLDG
MPLS MN
55415

NURSING HOME ADMRS BD EXAMRS
RM 340 717 DELAWARE SE
MPLS MN
55414

NW BELL TEL CO LEGAL DEPT
224 S 5TH ST RM 2000
MPLS MN
55402

NW REG. DEV. COMM
425 WOODLAND AVE
CROOKSTON MN
56716

O'BRIEN J.DENNIS
1100 1ST NATL BANK BLDG
MINNEAPOLIS MN
55402

OFFICE OF THE GOVERNOR
130 STATE CAPITOL
ST PAUL MN
55101

OLSON KATHLEEN
192 SEYMOUR AVE SE
MPLS MN
55414

OSTRUM DONALD E
PO BOX 33163
COON RAPIDS MN
55433

PATTISON ORVIS
BOX 645
WILLMAR MN
56201

PAYNE COL ALVIN

DEGRAFF MN
56233

PFEIFER AND SHULTZ, INC
1433 UTICA AVE S
MPLS MN
55416

PHAR MFGRS ASSN WM D PATTON
1155 15TH ST NW
WASHINGTON DC DC
20005

POPOVICH PETER S
314 MINN BLDG
ST PAUL MN
55101

PORTER DAVID
5217 27TH AVE S
MPLS MN
55417

POSS DONALD G
6301 SHINGLE CREEK PKWY
BROOKLYN CTR MN
55430

POYZER ROBT
BOX 675
FERGUS FALLS MN
56357

PULSCHER RBT SPRINGSTED INC
813 OSBORN BLDG
ST PAUL MN
55102

RALPH BURKE ASSOCIATES
7710 COMPUTER #S101
MPLS MN
55435

RANALLO CLARENCE
800 CENTRAL AVE N E
MPLS MN
55413

REAGAN MICHAEL
% MINN LEARNING CTR
BRAINERD MN
56401

REARDON MRS HELEN
1125 S E 6TH ST
WILLMAR MN
56201

NORTH CENTRAL ELEC ASSN
PO BOX 202
BATTLE LAKE MN
56515

NUGENT, CYNTHIA L.
3581 OWASSO ST #209
ST PAUL MN
55112

NURSING HOME RES ADV CO.
111 E FRANKLIN S210
MPLS MN
55404

NUTTER JULIA
743 W MONTANA
ST PAUL MN
55117

NYQUIST DEAN A
3707 53RD PL N
BROOKLYN CTR MN
55429

OLD COLONY GAS & OIL COMPANY
17TH AVE N AT 2ND ST
MPLS MN
55411

OLOFSON ARTHUR MBO & MAI
927 SOO LINE BLDG
MPLS MN
55402

OTTER TAIL POWER CO.
215 S. CASCADE ST.
FERGUS FALLS MN
56537

PAYNE WM B
2400 FIRST NATL BK BLDG
MPLS MN
55402

PETERSON GARY
854 MIDLAND BK BLDG
MPLS MN
55401

PHILLIPS LEGISLATIVE SERVICE
459 RICE ST
ST PAUL MN
55103

PINNETTI NICK M HALEY & A
40 CENTRAL PARK S
NEW YORK NY
10019

PORTER LYLE O

TRACY MN
56175

PORT AUTH CITY OF ST PAUL
330 MINNESOTA BLDG
ST PAUL MN
55101

PRAUSE JOS.C.
2220 105TH AVE.N.W.
COON RAPIDS MN
55433

PROCTOR&GAMBLE L THEOHAR
IVORYDALE TECH CENTER
CINCINNATI OH
45217

RADMAN RICHARD-LABOR TEMP
418 AUDITORIUM
ST PAUL MN
55102

RAMSEY CO MEDICAL SOC
908 AM NATL BK BLDG
ST PAUL MN
55101

RAUENHORST CORP-C ANDERSO
7900 XERXES S. S-2200
MPLS MN
55431

REID DAVID H
6469 N GRAHAM RD
INDIANAPOLIS IN
46220

RED OWL STORES INC
215 E EXCELSIOR AVE
HOPKINS MN
55343

REGION FIVE REG. DEV. COMM.
102 6TH ST N
STAPLES MN
56479

REGION NINE DEV. COMM.
709 N FRONT ST.
MANKATO MN
56001

RENNER R.H. ST PAUL AREA CC
300 OSBORN BLDG.
ST PAUL MN
55102

RENQUIST ARTHUR NSP CO
414 NICOLLET MALL
MPLS MN
55401

RIEKE DAVID R
P O BX 509
THIEF RIV FLS MN
56701

RIERSON G
1335 WHITE BEAR AVE
ST PAUL MN
55106

ROBERTS DR ALAN
BOX 297 MAYO U OF M
MPLS MN
55455

ROBERTS DAVID E
1260 NW NATL BK BLDG
ST PAUL MN
55101

RUDY FLOYD
118 AVE C
CLOQUET MN
55720

SATHRE, HARVEY
375 MARION STREET
ST PAUL MN
55103

SAX DOVE & STENSON
310 ENDICOTT BLDG
ST PAUL MN
55101

ST PAUL FOOD RETAILERS ASSN
1220 ARCADE
ST PAUL MN
55106

SW REGIONAL DEV COMM
2811 BDWY
SLAYTON MN
56172

SCHMIDT D R MN ASSN REALTORS
6101 WAYZATA BLVD
MPLS MN
55416

SCHMIDT H W TCHRS RETIREMENT
302 CAPITOL SQ BLDG
ST PAUL MN
55101

SCHNEIDER MAHLON
GREEN GIANT
LESUEUR MN
56058

SCHUTZ LINDA
RM 328 CAPITOL BLDG
ST PAUL MN
55155

SCHWINN ROBT.P.
1400 SOO LINE BLDG.
MPLS. MN
55402

SCHNEIDER & NEESER
706 1ST ST SO PO BX 876
WILLMAR MN
56201

SEMHSA R C MELIN
1903 S BDWY
ROCHESTER MN
55901

SENATE COUN OFF ROOM 24
STATE CAPITOL
ST PAUL MN
55101

SHABATURA EUGENE H
2833 LAKE AVE SO
DULUTH MN
55811

SHARP BOB
4125 HIGHWOOD RD
ST LOUIS PK MN
55416

REIERSON G
1335 WHITE BEAR AVE
ST PAUL MN
55106

REINO O LAINE 3M COMPANY
3M CENTER
ST PAUL MN
55101

RICHARDSON THOS
7851 METRO PKWY S 103
MPLS MN
55420

RICHARDS MONTGOMERY ET AL
1430 RAND TOWER
MPLS MN
55402

ROE DAVID
175 AURORA
ST PAUL MN
55103

ROBBIE JOSEPH
904 CARGILL BLDG NO CTR
MPLS MN
55402

ROSS ALFRED
6356 WARE RD
LINO LAKES MN
55014

ROSS ROY J
CLK TREAS
LITCHFIELD MN
55355

SAN SIMEON DEVELOP CORP
OLD 1ST STATE BK BLDG
PAYNESVILLE MN

SANFORD S M
7000 PORTLAND AVE
RICHFIELD MN
55423

SE MN REG DEV COMM
301 MARQ BK BLDG
ROCHESTER MN
55901

ST PAUL BUR HLTH DR P COX
555 CEDAR ST
ST PAUL MN
55101

SCARBOROUGH WILLIAM
DIV.ED. U.M.
MORRIS MN
56267

SCHLICHT REV ROBT
611 W MAIN ST
BELLE PLAINE MN
56011

SCHMIDT LARRY WCCO-TV NEWS
50 S 9TH ST
MPLS MN
55402

SCHMIDT WARREN WELLCOME M
GARDEN CITY
MN
56034

SCHWARTAU NEAL METH HOSP
201 W CENTER ST
ROCHESTER MN
55901

SCHWERMAN EARL JR
1535 8TH AVE SE
ROCHESTER MN
55901

SCHROEDER ALFRED H
2172 CARROLL AVE
ST PAUL MN
55104

SELECTVISION INC FR VALEN
245 PARK AVE
NEW YORK NY
10017

SENATE FINANCE COMMITTEE
113 STATE CAPITOL
ST PAUL MN
55101

SENATE GOV OP COMM
RM 303 STATE CAPITOL
ST PAUL MN
55155

SHAW ROBERT M
616 MOBIL OIL BLDG
MPLS MN
55402

SILVERMAN JUDITH
8545 W 28TH ST
ST LOUIS PARK MN
55426

SITE ENGINEERS INC
900 REDWELL LANE
APPLE VALLEY MN
55124

SIX EAST REG. DEV. COMM.
311 W 6TH ST
WILLMAR MN
56201

SNELL LYN
BOX 314
EDEN VALLEY MN
55329

SNYDER, R.W. U OF M
RM 248C CLASS OFF BLDG.
ST PAUL MN
55108

STANSFIELD ARLENE LAND OLKS
PO BOX 116
MPLS MN
55440

STATE BD VETERINARY EXAMINER
C/O DR A C SPANNAUS DVM
WACONIA MN

STATE REGISTER
95 SHERBURNE, RM 208
ST PAUL MN
55103

STD AM LIFE & ANNUITY CO
3801 W 50TH ST
MPLS MN
55410

STUPKA & MOREM
MIDTOWN BLDG
AUSTIN MN
55912

SULLIVAN J KIRK
PO BOX 200
BOISE ID
83701

SUSSEL CO.ATTN:TED SCHWENKER
1850 COMO AVE.
ST PAUL MN
55108

SWANSON BURT E
W-2162 1ST NATL BK BLDG
ST PAUL MN
55101

SWANSON MORTIMER C
5824 FRANCE AVE S
EDINA MN
55410

THOMPSON HESSIAN ET AL
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

TIMESAVERS INC ATT R S VOLD
5270 HANSON COURT
MPLS MN
55422

TWIN CITY RETAIL DRUGGIST AS
2388 UNIV AVE
ST PAUL MN
55104

VANDERVOORT T J MET WASTE
350 METRO SQUARE BLDG
ST PAUL MN
55101

VAN DRAKE STEPHEN R
BOX 353
PELICAN RAPID MN
56572

VIITALA, W.C. HONEYWELL
HONEYWELL PLAZA
MPLS MN
55408

VILLAGE OF WOODBURY
2100 RADIO DRIVE
WOODBURY MN
55042

VOS LEROY
2137 BURNS AVE
ST PAUL MN
55119

SIX W REG. DEV. COMM
128 W SORENSON
APPLETON MN
56208

SMERIKA WN.
BOISE CASCADE PAPERS
INTL FALLS MN
56649

SODERBERG HAROLD J
1500 MIDWEST PLAZA BLDG
MPLS MN
55402

SODERMAN ANTHONY
1414 FOSHAY TOWER
MPLS MN
55402

STATE&FED ASSOC
1101 15TH ST NW_S.309
WASHINGTON DC
20005

STATE & FED ASSOCIATES
1101 15TH ST NW S 309
WASHINGTON DC
20005

STEELWORKERS CREDIT UNION
BOX 250
BABBITT MN
55706

STOLPESTAD BROWN & SMITH
1550 NW BK BLDG
ST PAUL MN
55101

SULLIVAN JEANETTE
CDIC SW STATE UNIV
MARSHALL MN
56258

SUMMIT NATL BANK D L MORR
205 AURORA AVE
ST PAUL MN
55103

SWANSON DALE
P O BOX 339
FOREST LAKE MN
55025

SWANSON GERALD H
212 CITY HALL
ROCHESTER MN
55901

TATE VERN 3M CO
3M CENTER 220/6W
ST PAUL MN
55101

THOMPSON CONRAD
1107 23RD ST NW
ROCHESTER MN
55901

TOUCHE ROSS & CO K H STOCKE
780 NORTHSTAR CNTR
MPLS MN
55402

TWIN CITIES PIPING IND AS
5304 UNIV AVE SE
MPLS MN
55414

UNION STOCK YARDS
ATTN PRES
SO ST PAUL MN
55075

VAN EVERA MUNDT ET AL
700 TORREY BLDG
DULUTH MN
55802

VERRILL JOHN E
DEPT SECONDARY ED UOF M
DULUTH MN
55812

VOLDNESS PERRY
IDS 8TH & MARQUETTE
MPLS MN
55402

VOSS REV GORDON O
11120 NE 7TH ST
BLAINE MN
55434

WALD JEAN
5746 SANDER DR
MPLS MN
55417

WALTERS THOS H
4510 W 77TH ST STE 235
MPLS MN
55435

WANQUIST ALLEN
RM 252 FEDERAL BLDG
ST PAUL MN
55101

WATERS, DONNA M.
110506 WINDMILL COURT
CHASKA MN
55318

WEST CENTRAL REG. DEV.
ADM BLDG, COMMUNITY COLL
FERGUS FALLS MN
56537

WESTIN CHAS W
220 MEDICAL ARTS BLDG
DULUTH MN
55802

WILCOX J PATRICK
1220 NORTHERN FED BLDG
ST PAUL MN
55102

WM. MITCHEL COLLEGE LAW LIB.
2100 SUMMIT AVE.
ST. PAUL MN
55105

WILSON R GARY PPG INDUSTR
1 GATEWAY CENTER
PITTSBURGH PA
15222

WIS FEEDER PIG MARKET CO-OP

FRANCIS CREEK WI

WYANT CLINTON W ATTY

ATKIN MN
56431

ZIMMERMAN & OFFERMAN
CAMBRIDGE STATE HOSP
CAMBRIDGE MN
55008

WELK G V NORTHERN STATES
414 NICOLLET MALL
MPLS MN
55401

WHITING RALPH
555 WABASHA SUITE 204
ST PAUL MN
55102

WILEY ENTERPRISES
101 5TH AVE SE
OSSEO MN
55369

WOLKERSTORTER THEODORE
676 17TH AVE NW
NEW BRIGHTON MN
55112

WELLINGTON R R SKELLY OIL
PO BOX 1650
TULSA OK
75102

WHITLOCK A G
ECON LAB OSBORN BLDG
ST PAUL MN
55102

WILLIAMS THOS W
4915 W 35TH ST
MPLS MN
55416

WOZNIAK D D
401 FIRST FED BLDG
ST PAUL MN
55101

Statute Exh. 8
1-10-77
M.K.S.

STATE OF MINNESOTA

MINNESOTA ENERGY AGENCY

| | | |
|---|---|---|
| In the Matter of the Proposed Adoption of Amended Rules of the Minnesota Energy Agency Governing Electric Utility Information Reporting - Minn. Regs. EA 201-213 | ) ) ) ) ) | Docket No. EA-77-004-AK<br><br>STATEMENT OF NEED |

The above-captioned rules are amendments to existing rules of the Minnesota Energy Agency (hereinafter "Agency"). The original rules were adopted on June 2, 1975. The above-captioned rules represent the first amendments to those original rules.

The need to adopt these amended rules arises for the following reasons:

1. The need for the director of the Agency (hereinafter the "director") to continuously improve and more adequately and precisely meet the forecasting and current energy statistical requirements mandated by state law.

This information is required to be collected by Minnesota Statutes section 116H.10 Forecasts, Statistics, and Information Subdivisions 1 and 2.

> Subdivision 1. In order to further the purposes of sections 116H.01 to 116H.15, the director shall develop and maintain an effective program of collection, compilation, and analysis of energy statistics. The statistical program shall be developed to insure a central state repository of energy data and so that the state may coordinate and cooperate with other governmental data collection and record keeping programs.
>
> Subdivision 2. In addition to supplying such current statistical and short range forecasting information as the director may require, each utility, coal supplier, petroleum supplier and large energy facility in the state shall prepare and transmit to the director by July 1, 1975, and every year thereafter, a report specifying in five, ten, and 15-year forecasts the projected demand for energy within their respective service areas and the facilities necessary to meet the demand.
>
> The report shall be in a form specified by the director and contain all information deemed relevant by the director.

Minn. Stat. § 116H.10 Subds. 1 and 2 (1974), amended.

2. Certain additions to the rules are needed to help the director better anticipate the level of statewide and

geographical area energy demand and to help serve as a basis for long-range actions that the director may recommend to the legislature. This mandate for the director is required by Subdivision 1(c) of section 116H.11 of Minnesota Statutes. This subdivision requires the director in his biennial report to identify:

> (c) The anticipated level of statewide and geographical area energy demand for 20 years, which shall serve as the basis for long range action;.....

3. Other additions to the rules are made to more adequately aid the director in estimating the reduction in annual energy consumption resulting from the state's various energy conservation measures. This mandate is in Subdivision 1(f) of section 116H.11 of Minnesota Statutes. This subdivision requires the director in his biennial report to the legislature to identify:

> (f) The estimated reduction in annual energy consumption resulting from various energy conservation measures;.....

4. Other proposed additions or deletions to the original rules are a direct result of greater expertise and knowledge of the electric utility industry developed through firsthand experience in collecting and analyzing energy forecasts and statistics.

5. In other cases deletions have been proposed because certain information requirements are no longer necessary for the Agency to fulfill its legislatively mandated statistical and forecasting requirements. One-time historical information requirements are examples of this type of deletion.

In other cases certain information requirements were deleted because they were overly burdensome to the electric utility involved or of less-than-marginal value to the Agency.

6. Finally, in some cases deletions are proposed because the original rules are unnecessarily duplicative of information requests from other state agencies. The director is mandated to the "extent feasible" to eliminate unnecessary duplication.

It is submitted that the proposed amended rules as a whole are needed and reasonable for the foregoing reasons. Each substantive change in the original rules is explained and justified rule by rule in the paragraphs that follow. It should be noted that nonsubstantive changes in the rules, such as the reordering of items under a rule by a different number, letter, or letter style in the alphabet, are not explained or justified. Such changes in reordering by number, letter or letter style have occurred to make numerical, alphabetical or grammatical sense, or so as to conform with the rules of the State Register.

Changes of strictly a technical nature which do not alter the meaning of the rules are not deemed substantive; therefore, there is no explanation for this type of amendment.

The reasons that each proposed amended rule is reasonable and necessary follow.

EA 201 PURPOSE AND APPLICABILITY OF THE RULES

Current existing rules EA 200 on "Purpose" and EA 201 on "Applicability of the Rules" have been joined together as subdivisions A and B to proposed amended rule EA 201. The purpose for this change is to have consistency in all rules promulgated by the Agency. Beginning with rule EA 201 as opposed to EA 200 achieves this goal. The substance of neither original rule has been changed.

EA 202 DEFINITIONS

Definitions deleted completely were "Annual conversion efficiency" and "Annual plant efficiency." The purpose of these terms was originally to help measure the efficiency of a power plant in converting fuel to electric energy. We believe "Heat Rate" is a more common and better understood term to measure efficiency in the electric utility industry. Thus we have deleted those former definitions in favor of the term "Heat Rate," the definition for which was taken from the Glossary of Electric Utility Terms prepared by the Edison Electric Institute and has been added as a new subdivision J.

Amended definitions include "Distribution Only Utility" and "Generation and Transmission Utility." Previously, any utility

which generated any amount of power, even if it was for only a standby emergency situation, was excluded from the "Distribution Only Utility" category and was included in the "Generation and Transmission Utility" category. Generation and transmission utilities must file a more detailed report and forecast. Since this great detail is not necessary and is overly burdensome for small utilities who are primarily distributors and not generators of electricity, a change has been made to exclude utilities who generate less than 5% of their needed electricity from the "Generation and Transmission Utility" category. Through this definitional change, utilities who generate on only a standby basis and who generate less than 5% of their electricity would report only that data required for "Distribution Only Utilities."

Another amended definition is "Minnesota Service Area." For the purpose of consistency we have substituted a definition of service area contained in other Agency rules and regulations. While the wording is slightly different the meaning is still the same and consistency is achieved.

Two other amended definitions include "Summer Season" and "Winter Season." For easier reference these two definitions which were before lumped together under the definition "Summer months" have now been separated. In addition, the old language "months" was deleted in favor of the more pertinent term "Season" after the words "Summer" and "Winter."

Other new definitions included in this rule include: "Adjusted Net Demand," "Annual Adjusted Net Demand," "Annual System Demand," "Firm Purchases," "Firm Sales," "Large Electric Generating Facility," "Large High Voltage Transmission Line," "Net Generating Capacity," "Net Reserve Capacity Obligation," "Participation Power," "Participation Purchases," "Participation Sales," "Seasonal Adjusted Net Demand," "Seasonal Participation Power," "Seasonal System Demand," "System," "System Demand," and "Ultimate Consumers."

Those terms not previously explained are included in the definitional section because they are used in the reporting and forecast requirements for certain utilities in proposed new rule EA 207. Their definitions are added to provide greater clarity to utilities who must fulfill these requirements.

EA 203 REGISTRATION

Since the previous one-time filing date for all electric utilities operating in Minnesota has passed, all references to this June 1, 1975, filing date have been deleted from this rule. However, all new utilities commencing operation in the state must still file with the Agency.

EA 204 REPORTING DATES

No substantive changes have been made. Old references which either are outdated or are no longer accurate in the new rules have been deleted.

EA 205 FEDERAL REPORTS FILED BY UTILITIES

No changes have been made.

EA 206 BASIC FORECAST AND CURRENT DATA

The title of this rule has been changed to add the word "Basic" to reflect the more elementary aspects of this forecast as compared with the greater detail required of some utilities under newly proposed rule EA 207. Also, the words "Current Data" were added in recognition that part of the information collected in this section is current data.

The first substantive change occurs in proposed amended rule EA 206 A. Instead of a 5, 10, and 15-year forecast, the amended rule requires data for the past year and the present year, as well as a forecast for each of the next 15 years. The amount of additional work that is required of each utility is minimal, because filling in the missing years should be relatively easy, no matter which forecasting methodology is used. The Agency staff believes that yearly data is required to obtain a complete picture of anticipated growth in the use of electricity. Such data may also aid in better identifying effects of state energy conservation measures and in anticipating and evaluating certificate of need requests made by the utilities.

Also in proposed amended rule EA 206 A the word "generation" has been added as a part of the general description of the current data

and basic forecast that is to be reported. Absence of this word would make the following paragraphs confusing and inconsistent.

A further change in proposed amended rule EA 206 A is the deletion of the words "Minnesota Service Area." This deletion has been made because we no longer ask for peak demand on a Minnesota service area basis, and inclusion of this paragraph would make it inaccurate.

In proposed amended rule EA 206 B the less descriptive term "energy forecast" has been deleted in favor of the new wording "basic forecast" and "current data" which are more accurately descriptive. The word "reporting" is also striken in this paragraph because it is not necessary. An additional new reference to paragraph A is proposed to clarify which years' data must be reported.

Another change occurs in proposed amended rule EA 206 B 1. Here the old language "production" has been stricken in favor of the term "generation." The word "generation" is more commonly used in the electric utility industry. The word "peak demand" has been added so that this sentence is consistent in context with the contents of proposed amended rule EA 206 A.

In the proposed amended rule EA 206 B 1 a, the words "in kilowatt-hours" have been added to clarify the units in which annual electric consumption is to be reported. The words "shall include" have been added for clarification purposes at the end of the sentence.

A proposed new rule, EA 206 B 1 b, has been added. This section requires kilowatt-hours sold to ultimate consumers outside of the utility's Minnesota service area to be reported. This information is requested as a second part of presently existing rule EA 206 (b)(i)(cc), which deals with sales to other utility systems. The combination of these two different data items in the same subsection has proven to be confusing and difficult to understand. For this reason they have been separated into two different and distinct subdivisions in the new rules as proposed rule EA 206 B 1 b and proposed amended rule EA 206 B 1 d.

In proposed amended rule EA 206 B 1 e the word "production" is deleted in favor of the more generally accepted and easily understood word "generation."

In proposed amended rule EA 206 B 1 f in-plant electrical consumption is clarified to add language so as not to include electrical losses due to transmission or substations in this category. A separate category for transmission and substation loss is added in a new proposed subdivision EA 206 B 1 g. The reasons are both for clarity and to better identify the source of electric energy losses.

Two data subdivisions from the currently existing rules have been deleted; these are EA 206 (b)(i)(ff) and 206 (b)(i)(gg). Both items can be calculated from other required data; it is therefore not necessary to require these items.

Under the new proposed rules "peak demand" and "load factor" information is required by proposed subdivisions EA 206 B 1 h and EA 206 B 1 i, respectively. Since these items are so closely related to the generation and consumption data required by the earlier sections of this rule, these items have been made part of proposed amended rule EA 206 B 1. This was done rather than leave "peak demand" and "load factor" as separate items (aa) and (bb) as they are now under presently existing rule EA 206 (b)(ii), which is entitled "Electric Demand Forecast." The title "Electric Demand Forecast" has been proposed for deletion as unnecessary since "Peak Demand" and "Load Factor" become proposed rules EA 206 B 1 h and EA 206 B 1 i.

In proposed rule EA 206 B 1 h two amendments relating to "peak demand" have been made in the proposed amended rules. The first is the substitution of the word "system" for the words "Minnesota service area." This change is a practical realization that while a utility may provide data on its peak demand for its Minnesota system, it generally must use approximations and assumptions in calculating its Minnesota service area peak demand. For this reason and because asking for system peak demand is less confusing for the utilities, the Agency staff has decided it to be more reasonable to substitute the word "system" for "Minnesota service area." Within the same subdivision the word "season" was substituted for the word "months" for the sake of clarity and consistency.

In proposed amended rule EA 206 B 1 i "load factor" is now asked for on a "system" basis rather than for the "Minnesota service area" as required by the old rule. Providing such data for only the

Minnesota service area requires a prorated estimate which is not as useful to the Agency as the actual "load factor" for the utility's entire system. A second amendment substitutes the word "season" for the word "months" for clarity purposes in describing the summer season load factor and the winter season load factor.

All of currently existing rule EA 206 (c) has been deleted to eliminate duplication of information requested in proposed amended rule EA 206 A.

Currently existing rule EA 206 (d), which requires utilities to forecast electric consumption by region, has also been deleted. This rule has created problems for the utilities in the past. Since the Agency now collects energy consumption data by county on a current basis, we will be able to forecast by region in the future, based on the utilities' current consumption by county.

In proposed amended rule EA 206 C a one-time reference to the year 1973 has been deleted because it is no longer meaningful. Beginning in the third line, a sentence has been added requiring utilities who file estimates of data to file actual recorded figures when they become available. The reason for this requirement is the belief of the Agency staff that, while estimates are acceptable when nothing else is available, actual recorded data is preferable.

Since the Agency staff wishes to allow each utility to make its forecast based on the methodology most appropriate for that utility's system, language to that effect has been added in lines 8 and 9 in this same section. Language requiring utilities to make this forecast based on "the utilities best estimate of electrical energy growth" has been deleted, since it implies a particular methodology. The forecast continues to be based on those factors which the reporting utility deems most likely to occur within its system.

In lines 11, 12, 13 and 14 in proposed amended rule EA 206 C, we are proposing to delete the sentence, "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 reason for this deletion is the Agency staff's belief that this language could be interpreted by utilities to limit them

to making a simple linear projection of future electrical demand based on a constant growth factor. The Agency staff does not want to limit the utilities into making only this type of forecast but wants instead to provide latitude for the utilities to use whatever methodology would most accurately describe their particular growth pattern.

In addition to asking for the assumptions and factors used in arriving at the forecast, we are adding the word "procedures" in proposed amended rule EA 206 C so the Agency can be better informed as to the methodology used by the utility in obtaining the forecast.

Also deleted, in this same paragraph on forecasting documentation, is the sentence which states that "each utility shall evaluate the size of the estimating error, given the conditions and factors used in the estimate." This sentence is deleted because the following sentence says the same thing in a slightly different manner.

In addition, the words "best estimate" have been deleted throughout the paragraph as unnecessary and confusing.

An additional new sentence has been added to allow utilities which will be required to file an extended forecast pursuant to proposed new rule EA 207 to be exempt from the forecasting documentation under proposed amended rule EA 206 C. This avoids duplication since proposed new rule EA 207 requires extensive documentation for both the basic forecast under proposed amended rule EA 206 and the extended forecast under proposed new rule EA 207.

EA 207 THE EXTENDED FORECAST

The information in proposed new rules EA 207 A and 207 B is an expansion of the requirements of proposed amended rule EA 206. Since the utilities named in proposed new rule EA 207 generate 80 percent of the electricity consumed in Minnesota, a more comprehensive understanding of their operation and future plans is essential to the welfare of the state and for the Agency to fulfill its legislative mandate to collect data and forecast future electricity usage.

In some cases these large utilities cross state boundaries and are interconnected in a large electrical grid system which is called the Mid-Continent Area Power Pool. (MAPP is a pooling agreement whose members are the utilities and cooperatives in Minnesota and in

neighboring states.) Power sharing and reliability agreements between such utilities require the Agency to have more comprehensive reporting requirements to have a true picture of the state's actual electric energy situation, alternative ways of meeting new energy demands, and the effect Agency policies and recommendations may have on Minnesotans and people in neighboring states.

While some of this information is required by the Agency's certificate of need program, collecting data annually will give the Agency improved current statistics on Minnesota's electric power situation. This will provide the Agency staff with a better understanding of current and future demand and also the sectors of the economy contributing to those demands. It should aid the Agency staff in measuring the potential impact of state conservation efforts, both enacted and proposed. This data should enable the Agency to propose new methods to reduce demand while creating as little economic dislocation as possible.

The required data will provide an understanding of the efficiency of the existing utilities. Finally, by comparing statistics collected on an annual basis with those provided by the utility at the time of certificate of need application, the director has a better opportunity to evaluate the validity of a utility's request for a new facility.

As important as these forecast and current data statistics are, <u>just as important is the method by which they are calculated.</u> The forecast documentation section in proposed new rule EA 207 C requires the utilities to detail the methodology used, the data base used for the forecast, and the assumptions upon which the forecast is based. This information is essential for determining the degree of validity of the forecast, the conditions under which it is applicable and the variables which might alter the forecast. To evaluate the validity of a forecast it is important to understand the data used. Evaluating forecasts is required of the Agency's director by Minn. Stat. § 116H.10 Subd. 5. (1974)

Since utilities are interdependent and the capability of one affects the capabilities of others, proposed new rule EA 207 C 4 requires submission of information describing the extent to which the utility is coordinating its load forecasts with those of neighboring systems. Such information will give the Agency staff some idea of

the alternatives that might be available for meeting new anticipated power demands.

The amendments are necessary for the reasons stated and are reasonable statements of those necessary changes.

EA 208 GENERATING FACILITIES

The name for this section has been changed from "Facility Requirements" to the more appropriate general term "Generating Facilities."

Proposed amended rule EA 208 A concerns the present generating facilities. The only change in this section is the addition of the specification of the "type" of plant for each generating facility in proposed amended rule EA 208 A 1. The Agency needs this information to inventory the generating facilities operated in the state and their relative effectiveness.

Items deleted under this subdivision include current rule EA 207 (a)(ii) on "the year (the plant was) constructed." Since the year the plant began operation is required by the rules, this information is unnecessary.

Proposed amended rule EA 208 A 6 requires submission of the plant's capacity on a peaking basis and deletes reference to measuring capacity "on a continuous basis." The Agency staff believes the new terminology is more specific and meaningful.

Proposed amended rule EA 208 A 8 replaces the term "conversion efficiency" with the more commonly used and accepted term "heat rate."

In proposed amended rule EA 208 B on "future facility additions" the word "additions" has been substituted for the word "requirements." The Agency staff believes the new wording is more appropriate and more accurately describes the subdivision.

In the introductory paragraph of subdivision B the wording "best estimate forecasts" has been amended to "forecast." This language change updates less accurate and less appropriate old language. The word "projected" also has been deleted from this paragraph as being unnecessarily repetitive.

Deletions resulting from amended rule EA 208 B include rule EA 208 b(ii), which required submission of the construction date of the new plant. The Agency staff believes this item is of little

importance, particularly since the rules do request the date the plant will begin operation.

Proposed rule EA 208 B 6 requests the type and amount of fuel to be used to operate the plant on an annual basis. This item is a consolidation of currently existing rules EA 208 (b)(vii), 208 (b)(viii and 208 (b)(x), which have now been deleted. The state needs to know the additional amount of energy and type of fuel a new generating facility will require.

Proposed amended rule EA 208 B 5 has been amended by replacing the words "full capacity" with the words "normal conditions under normal maintenance and circumstances." The reason for this new language is that no utility plant will be continuously run at full capacity for a full year! Thus the new language more accurately reflects what can be built.

An addition to proposed rule EA 208 B 7 is the estimated "heat rate" of the proposed plant. This term, as has been previously noted, is more commonly understood and used than "annual conversion efficiency" as required by deleted rule EA 208 b (ix).

Finally, current rule EA 208 (b)(x), which requested the estimated amounts of primary and secondary fuels required annually to operate a projected new plant at its projected production rate is deleted. This item is an unnecessary duplication of proposed rule EA 208 B 6, which asks for the amount of fuel to be used to operate the plant on an annual basis.

Proposed rule EA 208 C on "future facility retirements" is a new rule. The requested data is needed for the Agency to know the reason a particular facility is being closed, as well as the time and amount of capacity needed to replace it.

Proposed amended rule EA 208 D requires submission of annual data on each utility's fuel requirements, including the amount of electricity generated by each fuel type.

A substantive change was made in proposed amended rule EA 208 D 1. The Agency staff proposes to delete the request for the annual amount of each fuel for a utility's power plants serving Minnesota, and instead to ask for the amount of each fuel used by only the power plants located within Minnesota. The reason for this change is the

Agency's need for accurate data on future primary fuel needs in Minnesota and by power plants located in Minnesota. If fuel data for plants located in Wisconsin or North Dakota are mixed in (border plants often serve Minnesota customers), the results will not accurately portray the amount of that type of fuel burned in Minnesota and used by utilities in Minnesota.

Another substantive amendment to rule EA 208 D 2 requires the utility to project future fuel needs of Minnesota power plants only, not plants located in neighboring states. Data for "Minnesota power plants" only has been requested, and the term "serving its Minnesota Service Area" has been deleted.

Also in this same paragraph the unnecessary words "best estimate" have been deleted.

For consistency, electricity generated by "Minnesota power plants" by fuel type is required, and the reference to power plants "serving its Minnesota Service Area" is deleted in the same paragraph. Once again the Agency's main interest is knowing the kilowatt-hours generated by different types of fuel within Minnesota only.

Finally, a one-time information request relating to 1973 in proposed amended rule EA 208 D 2 has been completely deleted.

EA 209 TRANSMISSION LINES

All of currently existing rule EA 208 on transmission lines has been deleted. The reason for striking this old rule is a desire on the part of the Agency to request information which is consistent with data required under Minn. Regs. EA 601-638, which specify contents of certificate of need applications for large high voltage transmission lines.

Another reason for this information is the Agency's wishes to know of all existing and proposed power lines, their lengths, and the capability and efficiency of such lines to evaluate and recommend long-term state policy on electrical energy growth and energy goals.

Knowledge of both the present and future transmission line grid is essential in evaluating alternatives which might meet projected state energy needs. Therefore, proposed amended rule EA 209 requires identification and characterization of the existing Minnesota transmission line grid and a list of future retirements and additions of transmission lines.

Recent events surrounding the construction of new transmission lines and a gradual drift toward more electrical energy usage within the state reinforce the Agency's strong need to evaluate the effect of this drift and possible alternatives to current transmission line technology.

EA 210 OTHER INFORMATION REPORTED ANNUALLY

Subdivision A remains unchanged.

Under proposed amended rule EA 210 B a list of those customers who consume over 600,000 kilowatt-hours per year replaces a list of the utility's 25 largest customers. In cases where a utility does not have at least 15 customers of that size, the rule requires identification of the largest 15 consumers. The purpose of this rule is to identify the state's largest users of electric energy. Under the current rule which provides the largest 25 customers of a utility, we are not actually identifying the state's largest users of electricity. For instance, NSP's 26th largest customer is not listed under the old rule, even though it may well be much larger than the largest consumer of a smaller utility.

With the amended version of the rule the Agency will be able to assemble a list of every large electrical energy user in the state of Minnesota. This should be helpful in initiating conservation programs for large energy users. The proposed amended rule requires under all circumstances a list of at least the 15 largest users because the Agency may want to propose or adopt either regional conservation programs or across-the-board utility conservation programs.

In proposed amended rule EA 210 C reference to "firm contracts," "interruptible contracts," and "standby" contracts are believed to be confusing and unnecessary for the Agency to carry out its responsibilities. They have been deleted.

In proposed amended rule EA 210 D the phrase "unless already reported pursuant to rule EA 207 B 5 and 6" has been added to avoid repetitive reporting.

Under proposed amended rule EA 210 F 1 the word "system" has been replaced by the more appropriate word "utility." Also, in proposed amended rule EA 210 F 2 the Agency staff proposes to replace the term

"voltage rating" with the word "location." Knowing the location of the interconnection between two utilities is of importance, while the voltage of the Minnesota line is collected under the section of the rules on transmission lines.

Currently existing language at the end of rule EA 210 F 3, giving the director authority to require data collected annually to be reported quarterly has been deleted. It was simply felt that this authority was not needed since quarterly reports are now required by rule EA 211.

Proposed rule EA 210 G, H, I, and J are new subdivisions.

Proposed rule EA 210 G requires present rate schedules to be filed. The Agency needs this data for comparative heating rates and research regarding changes in rate structure to bring about energy conservation.

Proposed rule EA 210 H requires sales to ultimate consumers by county to be reported annually. This information will allow the Agency to geographically identify present and future electrical energy usage in Minnesota.

Proposed rule EA 210 I requires that a particular federal form be filed with the Agency. The form identifies the amount of electricity used by each class of end users. This information is important to the Agency to identify broad sectors of the economy where the bulk of electricity energy demand is.

Proposed rule EA 210 J requires distribution only utilities to file annually the amount of kilowatt-hours of electricity they generate on a standby basis. The reason for this requirement is to enable the state to keep an accurate total of kilowatt-hours generated in the state.

EA 211 QUARTERLY REPORTS OF ENERGY DELIVERED TO ULTIMATE CONSUMERS

The only substantive change occurring in proposed amended rule EA 211 A is the deletion of the words "zip code" and insertion of the word "county" in its place. It has been found that utilities can more easily report this data by county than by zip code. Since either geographical area serves the Agency's purposes, the change has been made.

One addition to rule EA 211 B would give the director discretion

to exempt small distribution only utilities from the quarterly report provided they reported their large customers usage (over 600,000 kwhr) and filed with the Agency their FPC or REA report form on end-use consumption by category on a quarterly basis. The reason for this exception is that the staff believes that some small REA utilities are undermanned and that complete reporting requirements would be overly burdensome for them. In addition the Agency recognizes that these utilities sell only a very small percentage of the electricity consumed in the state. We believe the Agency can accurately identify quarterly electric energy trends without overburdening the small utilities.

Currently existing rule subdivisions (b) and (c) have been deleted because of their one-time only applicability to the reporting year 1975.

Currently existing rule subdivisions (d) and (e) have been deleted because they are no longer applicable.

OLD EA 211 ADVANCE FORECAST FOR POWER PLANT SITING

Since this data is collected by the MEQC and can be secured upon request, the Agency staff proposes to delete the entire rule as unnecessary duplication.

EA 212 CORRECTIONS

No amendments are proposed for this rule.

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

The only change proposed in this rule is a technical change in the first two lines to clarify the original meaning. If a utility wants to substitute federal or state agency data for an Energy Agency request, it should initiate the process by writing the Agency a letter. The wording in the presently existing rule caused some confusion and whose duty it was to write the initial letter was misinterpreted.

The foregoing paragraphs present those facts which show the need for and reasonableness of the proposed amended rules. The rules should be recommended for adoption as proposed.

Daniel Quillin

Daniel Quillin
Research Analyst
Minnesota Energy Agency

Dec. 16th, 1976
Dated

STATE OF MINNESOTA
OFFICE OF HEARING EXAMINERS

FOR THE MINNESOTA ENERGY AGENCY

IN THE MATTER OF THE PROPOSED )
ADOPTION OF AMENDMENTS TO RULES)
OF THE MINNESOTA ENERGY AGENCY )
GOVERNING ELECTRIC UTILITY )
INFORMATION REPORTING - MINN. )
RULES EA 201 - 213. )

REPORT OF THE
CHIEF HEARING EXAMINER

WHEREAS, a hearing was held on January 10, 1977, before Allan W. Klein, a Hearing Examiner of the State Office of Hearing Examiners, on the above-entitled matter in compliance with Minn. Stat. §15.0412, Subd. 4; and

WHEREAS, the Report of Hearing Examiner made pursuant to Minn. Stat. §15.052, Subd. 3, was issued to the Energy Agency on February 18, 1977; and

WHEREAS, the Energy Agency has now determined to adopt rules pursuant to Minn. Stat. §15.0412, Subd. 4; and

WHEREAS, the Energy Agency has submitted said rules to the Chief Hearing Examiner for review pursuant to Minn. Stat. §15.052, Subd. 4, and Rule HE 107; and

WHEREAS, the Chief Hearing Examiner finds that the final proposed rules are not substantially different from those proposed at the public hearing and that the Energy Agency has met all requirements of Minn. Stat. §15.0412, Subd. 4.

NOW, THEREFORE, upon receipt of this Report, the Energy Agency has the responsibility of submitting the complete hearing record and the rules as adopted by the Agency to the Attorney General and to publish in the State Register, all pursuant to Minn. Stat. §15.0412, Subd. 4.

Dated this 31st day
of March, 1977.

Duane R. Harves

DUANE R. HARVES
Chief Hearing Examiner

STATE OF MINNESOTA

MINNESOTA ENERGY AGENCY

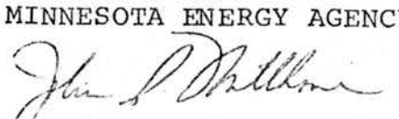
| | | |
|---|---|---|
| In the Matter of the Proposed Adoption of Amended Rules of the Minnesota Energy Agency Governing Electric Utility Information Reporting - Minn. Regs. EA 201-213 | ) ) ) ) ) | Docket No. EA-77-004-AK<br><br>ORDER ADOPTING RULES |

The above-entitled matter came on for hearing before Allan W. Klein of the Minnesota Office of Hearing Examiners for the Director of the Minnesota Energy Agency at 9:30 a.m. on January 10, 1977, in Conference Room D of the Veterans Service Building, Saint Paul, Minnesota, after proper notice required by Minn. Stat. § 15.0412 (Supp. 1975) was served on 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 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 and the reasonableness thereof,

NOW, THEREFORE, IT IS ORDERED that the amended rules identified as Minn. Regs. EA 201-213 are adopted this 28th day of March, 1977, pursuant to authority vested in me by Minn. Stat. § 116H.08(a) (1976).

STATE OF MINNESOTA
MINNESOTA ENERGY AGENCY



John P. Millhone
Director

STATE OF MINNESOTA

MINNESOTA ENERGY AGENCY

| | |
|---|---|
| In the Matter of the Proposed Adoption of Amended Rules of the Minnesota Energy Agency Governing Electric Utility Information Reporting, Minn. Reg. EA 201-213. | Docket No. EA-77-004-AK<br><br>STATEMENT OF COMPLIANCE WITH MANUAL OF RULE-MAKING PROCEDURES |

I, Special Assistant Attorney General Dwight S. Wagenius, 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 Rulemaking Procedures has been followed.

Dated: April 8, 1977

Dwight S. Wagenius

Special Assistant
Attorney General