

Northern States Power Company/Northern States Power Company (WI)

**Contemporaneous Disclosure
In Compliance with 18 C.F.R . Section 358.7(a)(1)(2) (formerly Part 358.5(b)(3))**

If an employee of the Transmission Provider discloses information in a manner contrary to the requirements of § 358.5(b)(1) and (2), the Transmission Provider must immediately post such information on the OASIS or Internet website.

#	Contemporaneous Disclosure
1	Sep 17, 2004: TP discussed with XEM the following: New Richmond Sub Transformer2 is intended to be taken out of service for approx. 2 hours the week of Oct 11 if OK with customer.
2	Feb 14, 2006: It was inadvertently disclosed to an Xcel Energy marketing affiliate employee that Great River Energy contacted Xcel with a request to install a substation on Sherco property.
3	Sep 15, 2006: On September 14, 2006, Xcel Energy security staff, as part of their standard surveillance procedures, determined that between the dates of 9/5/06 – 9/14/06 a contract mail room employee entered card-restricted areas at our Marquette Plaza offices to deliver mail using other employees' electronic ID cards. This contract employee has not taken the FERC Order 2004 training required for card access to this area. The contract employee did not view any nonpublic transmission information during his unauthorized access to the restricted area.
4	<p>October 4, 2006: As a result of an administrative oversight after an organizational change, an Xcel Energy Wholesale Merchant Function employee received the weekly reports of a Transmission Function employee for three weeks in September 2006. The reports contained the following transmission information:</p> <p><u>Brookings Co. Sub (New 345-115kV Sub):</u> New transformer (345kV-115kV, 448MVA) arrived at Northtown RR siding in Minneapolis last week and is enroute to WAPA's White substation for short-term storage prior to installation at substation. <u>Slayton Substation:</u> Our Conditional Use Permit (CUP) application for our new substation site was approved by the Murray County Board on September 12th. The CUP was approved unanimously, without conditions. <u>Fieldon Sub (New 345kV Series Capacitor Bank Station):</u> Capacitor Bank equipment proposals (345kV, 20 ohm, 2000 amp) have been reviewed and preliminary recommendation has been reached on the supplier. <u>Buffalo Ridge Sub (115kV Ring Bus and Line Term), & Yankee Sub (New 115-34.5 kV):</u> WAPA is performing an Environmental Assessment (EA) on the 115kV line route. Substation site grading cannot proceed without EA Approval. If permission is not granted by WAPA soon, the projects will not meet the required in-service date for the new wind generation. <u>SWMn Transmission Upgrade:</u> Mn/Dot has reviewed our I-90 application and is sending it this week to the Federal Highway Administration (FHWA) for their approval. If the local FHWA agent concurs with Mn/Dot's recommendation, we will likely have an approved permit within weeks. We have also established backstop support through HDR (engineering firm) to expedite review of our permit, should it be sent to D.C. for approval. We are currently reviewing options to mitigate schedule risk should the permit approval process continue past October 1st.</p> <p>The distribution list for the Transmission Function employee's weekly reports was corrected immediately after the error was discovered.</p>
5	<p>October 17, 2006: A meeting notice, containing agendas for two separate meetings related to the NSP-Wisconsin Bay Front plant, was distributed to a group of employees, including three Wholesale Merchant Function (WMF) employees. One agenda is for a meeting on 10/23/06 between the WMF employees and Shared employees. The second agenda is for a separate meeting on 10/23/06 between Transmission Function employees and Shared employees. The meetings were planned to be conducted separately to comply with the standards of conduct rules. However, the second agenda was provided to the three WMF employees and contained the following transmission information:</p> <p>Problem Statement: The Bay Front plant currently provides a contribution to Transmission support for</p>

	<p>Northern WI area reliability. However, there exists uncertainty concerning the plant's future support and contribution for transmission reliability.</p> <p>Issues for discussion and clarification:</p> <ul style="list-style-type: none"> American Transmission Company (ATC) interconnection - project description & NSP benefits. <p>Proposed Tasks & Follow-up: Prepare and submit a request for a transmission modeling study to determine the future impacts the interconnection from the ATC Arrowhead-Wausau 345 KV into NSP's Stone Lake substation will have on the reliability need for Bay Front (and the Flambeau) generation.</p> <p>Identify schedule for study completion and for evaluating/updating the study findings related to the Northern (WI) Area Local Area Operating Guide.</p> <p>The employee responsible for sending out the meeting notice and agendas has been instructed to separately send out the agendas for any future similar meetings related to the Bay Front issue.</p>
6	<p>August 11, 2007: Late in the afternoon of August 10, a Shared employee inadvertently disclosed summary information on a wind power interconnection project to a Wholesale Merchant employee in the mistaken belief that the report described a purchased power agreement with a wind generator. The one-page PowerPoint report included statements that the NSP Chanarambie Substation expansion would interconnect to a 250 MW wind power generator and identified an in-service date of 2008.</p> <p>The wholesale merchant employee, who was shown the report, immediately identified it as referencing a transmission project and read no further.</p>
7	<p>October 25, 2007 - Transmission Function and Transmission Acquisition Function (wholesale merchant function) personnel held a conference call today regarding the timing of the interconnection of a wind generation project to the NSP System. The wind generation project has executed a purchase power agreement with the wholesale merchant function of NSP to sell the entire output of the generator to NSP, and the wind generator (the Interconnection Customer) has executed a Standards of Conduct written consent to allow communications between Transmission Function and Wholesale Merchant Function personnel related to the project. The purpose of the conference call was to discuss the schedule for completion of the interconnection. During the meeting, Transmission Function personnel inadvertently disclosed transmission construction and in-service date information beyond specific information related to interconnection of the wind generator. NSP then posted an updated schedule of the specific transmission construction and in-service date information on the NSP OASIS (http://oasis.midwestiso.org/OASIS/NSP) on October 25, 2007.</p>
8	<p>January 9, 2008 -- On December 18, 2007, NSP received a data request from the Minnesota Department of Commerce in a pending Minnesota retail regulatory matter requesting certain information about two transmission transformer outages and the potential impact of the outages on the cost of energy or fuel. The data request sought both transmission outage information and generation/energy cost information, and subparts of the data request were assigned to a Transmission Function (TF) employee and other subparts of the request were assigned to a Wholesale Merchant Function (WMF) employee. In the process of completing the request, the regulatory case administrator (a Shared employee) provided a copy of the draft response by the TF employee to the WMF employee on Thursday afternoon January 3, 2008. A management employee in the Regulatory function then notified Legal Services personnel of the disclosure.</p> <p>The draft TF employee response included the following information that may be considered non-public transmission information:</p> <p><u>Chisago 345/115 kV TR6 Transformer</u> - There has been no impact to purchased power, congestion or re-dispatch as a result of the transformer failure. The studies performed to review summer conditions indicate no impact as well.</p> <p><u>King 345/115 kV TR9 Transformer</u> Typically the impact of transmission outages on generation dispatch is minimal. For example during the 2007 summer (June – August) NSP transmission facilities were the binding constraint, driving generation re-dispatch, for only 16.2 hours over 6 different days according to the Midwest</p>

	<p>ISO. The King 345/115 kV, 448 MVA, transformer outage contributed 13.8 hours of the 16.2 for post-contingent analysis.</p> <p>Recently the Midwest ISO's [sic] responded with the following information to a request on dispatch impact of the King 345/115 kV transformer outage on December 20, 2007.</p> <p><i>Baytown-Long Lake flo King-Eau Clair-Arpin + TR9 was activated in clogger from 1045 on 9/5 to 0110 on 9/6, binding about 41% of the time.</i></p> <p><i>No manual redispatch associated with this binding period.</i></p> <p>Therefore the outage of King 345/115 kV transformer has not impacted the generation dispatch since the Summer 2007. If the transformer returns to service as currently scheduled on May 30, 2008, the outage should have minimal impact on the generation dispatch.</p> <p>In addition to this disclosure, the specific Shared employee who inappropriately disclosed the transmission information has been reminded of the need to carefully restrict the distribution of data request responses that may contain non-public transmission information to WMF employees.</p>
9	<p>During a review of reports available to users of the NSP System Load Accounting and Billing System (LABS), it was determined some LABS reports containing transmission flow information were potentially available to a single wholesale merchant function (WMF) employee. The reports did not contain real-time information but contained previous day values of hourly energy flows for several NSP System transmission lines and contained hourly energy values used in several intermediate calculations in the determination of NSP System hourly load. The WMF employee was contacted and stated that the employee did not use these LABS reports and did not know of their existence. The WMF employee's access to these reports was promptly removed.</p>
10	<p>On January 7, 2010, the NSP System transmission control center issued a transmission outage notice to the standard email distribution list for such outage notices. The notice indicated the the 69 kV Bird Island-Franklin-Troy Switching Station 69KV line had tripped and stayed out, as a result of a pole fire, affecting load serving service to the Minnesota townships of Birch Cooley, Henryville and Troy. These communities are served by a distribution cooperative which purchases its wholesale power from an entity other than NSP. The outage alert for a 69kV line was sent out approximately 90 minutes after the line had tripped, and service was restored 88 minutes after the line tripped. The trip of the 69 kV load serving line did not affect available transmission capacity on the NSP System. The total load affected by the outage was approximately 3 MW.</p> <p>The transmission outage notification email was inadvertently sent to an employee who had transferred from a Public Service Company of Colorado Transmission Function position to a Wholesale Merchant Function position effective January 4, 2010. The WMF employee was in training on January 7, 2010, and not yet directly engaged in WMF activities. The WMF employee promptly deleted the email and notified the NSP transmission operator of the inadvertent notification by email. The WMF employee was then removed from the transmission outage notification email distribution list. The outage notification did not result in the disclosure of material non-public transmission information. Xcel Energy is reviewing and updating its processes related to employee transfers and outage notification email lists to prevent a similar erroneous notification in the future.</p>