

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

**Contemporaneous Disclosure
In Compliance with 18 C.F.R. Section 358.7(a)(1)(2)**

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).</u> & <u>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</p>

	<p>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 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 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>
11	<p>During the evening of March 31, 2011, as a result of an administrative oversight, one Xcel Energy Wholesale Merchant Function employee received a weekly report issued by a Regulatory function of Xcel Energy that contained the following potentially non-public transmission function information:</p> <ul style="list-style-type: none"> An internal group from Transmission, Regulatory, and Legal are meeting to discuss a proposal by a municipal power agency to divide the transmission facilities owned by a municipal utility between the NSP pricing zone and another pricing zone within the

	<p>MISO footprint, or to move the entire load of the municipal utility into the NSP pricing zone. The disclosure did not identify the specific transmission facilities, the associated revenue requirement, or the rate impact on the NSP pricing zone or the third party pricing zone of either option.</p> <ul style="list-style-type: none"> Midwest ISO would be making a compliance filing to a 2008 FERC order in the North Dakota Export congestion management docket on April 1, 2011 with a proposed September 1, 2011 effective date. This filing will propose to permanently implement the standard MISO congestion management approach on the western MISO seam. The MISO filing will be public on April 1, 2011, and is subject to FERC approval. <p>The Regulatory employee immediately attempted to recall the email containing the potentially non-public transmission information, but Xcel Energy is posting this contemporaneous disclosure out of an abundance of caution.</p>
12	<p>On May 17, 2011, a Transmission employee sent an email to other Xcel Energy employees (including one WMF employee) stating NSP Transmission has terminated NSPM-Wisconsin Power and Light Company-Rate Schedule 410, NSPW-Wisconsin Power and Light Company-Rate Schedule 65. The email indicated Alliant is filing the termination with FERC and NSP Transmission will need to perform a status filing with FERC.</p>
13	<p>On June 14, 2011, a wholesale sales customer of NSPW sent a letter dated June 13, 2011 to Xcel Energy by email raising questions about the transition from wholesale requirements purchases from NSPW to purchases from a third party supplier. As publicly noted in the settlement of FERC Docket No. ER10-992-000, NSPW's ten wholesale customers have each issued a notice of termination of their wholesale interconnection and interchange agreements with NSPW by 12/31/12. The customer letter addressed several issues including whether new interconnection agreements will be required in light of notices of termination of the wholesale requirements contracts with NSPW. A shared employee of Xcel Energy forwarded a copy of the email to a single Merchant Function employee on June 15, 2011. Upon discovery of this disclosure during the afternoon of June 16, 2011, Transmission Function and Shared employees were immediately reminded by email from Xcel Energy counsel of the requirements of the No Conduit Rule and notified not to engage in further communications with Merchant Function employees related to the NSPW transitional arrangements.</p>
14	<p>On a conference call on August 8, 2011, an employee discussed the plans regarding the posting of the NSP System Attachment O formula rate for 2012 in light of the uncertainty whether the MISO Board of Directors will approve the Brookings project as an MVP in December 2011. The employee stated the NSP System Attachment O and Attachment MM rates would be calculated and posted without Brookings included as an MVP in Attachment MM, but rate calculations with Brookings included in Attachment MM as an MVP would be distributed at the annual customer meeting and submitted to MISO if Brookings to be effective 1/1/12 is approved as an MVP. The employee indicated that Xcel Energy personnel were meeting today to discuss 2012 rate posting plans and also discussing the Attachment MM calculation issues with Great River Energy, a participant in the Brookings Project.</p>
15	<p>On October 3, 2011, Xcel Energy Regulatory personnel convened an internal conference call related to implementation of the FERC Audit Report recommendations in FERC Docket No. FA10-8-000. The final audit report (April 2011) recommended that NSPM and NSPW file cancellations of the portions of bundled Interconnection and Interchange (I&I) agreements that have terminated. The meeting was called to discuss implementation of that recommendation related to approximately a dozen "bundled" municipal I&I agreements, and included both Transmission Function and Wholesale Marketing Function personnel, since the agreements include both transmission (e.g., interconnection) and wholesale sales provisions/schedules. In response to a question, a Transmission Function employee indicated that NSP Transmission has a plan to cancel the municipal I&I agreements. Regulatory personnel then interjected and the discussions regarding specific plans ceased.</p>
16	<p>On May 11, 2012, an NSP employee forwarded a meeting request to several internal employees. The meeting relates to a proposed project whereby a large retail customer that operates parallel generation</p>

	facilities might increase the capacity of the parallel generation, and the NSP facilities that might be required if the expansion were constructed. The meeting notice included an attachment with a description of the proposed project. One of the recipients of the meeting notice was an employee classified as Wholesale Merchant Function. The issue was promptly identified by another recipient of the meeting notice, who notified both the sender and WMF recipient of the concern. The WMF employee stated that the employee deleted the meeting notice and attachments without reviewing the information. The employee who sent the email indicated the WMF employee will not be included in future emails or meetings where transmission information related to the project might be discussed.
17	On May 14, 2012, an Xcel Energy employee responded to a meeting notice regarding the potential interconnection to the NSP System at distribution voltage of a small (less than 10 MW) wind generator proposing to deliver to the MISO energy market. The purpose of the meeting was to discuss issues related to the potential interconnection and wheeling of the wholesale power to NSP transmission system. The email response added a Wholesale Merchant Function employee to the list of potential meeting attendees. Another Xcel Energy employee then sent two emails with additional information and issues regarding the proposed interconnection and wheeling service to the additional potential meeting attendees. The Wholesale Merchant function employee immediately asked to be deleted from the email distribution list, and did not read the emails beyond the introductory content once the WMF employee realized the subject of the emails. Xcel Energy counsel also notified all email recipients to exclude the WMF employee from all future emails on the topic.
18	On February 28, 2018, it was discovered that two Xcel Energy Services Inc. employees classified as Marketing Function employees had authorized access to two Xcel Energy computer applications that contain non-public transmission function information. The two employees had been granted access to the computer applications while in previous, non-Marketing Function positions, and access had not been removed when the employees transferred to their Marketing Function roles. Once discovered, access to the computer applications for one employee was promptly removed. Access for the other employee was inadvertently not removed until May 2, 2018. Both employees confirmed that they did not access the computer applications after they became Marketing Function employees. XES believes no non-public transmission function information was accessed after the two employees moved into a Marketing Function role, and no non-public transmission function information was shared with or accessed by Marketing Function employees. XES is posting this disclosure out of an abundance of caution.
19	On January 23, 2019, it was discovered that a new Xcel Energy Services Inc. employee classified as a Marketing Function employee had been inadvertently granted access to an Xcel Energy computer application that contains non-public transmission function information. The employee was granted access to the portion of a computer application containing non-public transmission information at approximately 9:00 a.m. MST. The Marketing Function employee accessed the system about 9:10 a.m. MST, immediately notified the application manager that the employee was able to view transmission information, and closed the application. Access was removed at 9:12 a.m. MST. XES believes no non-public transmission function information was shared with or accessed by any other Marketing Function employees. XES is posting this disclosure out of an abundance of caution.
20	On Friday, November 9, 2018, a restricted folder containing certain Non-Public Transmission Information was incorrectly archived to an electronic file location on a shared drive that did not have the proper folder access restrictions assigned. The archive folder was accessible by any employee. The following Monday, November 12, 2018, an analyst discovered the error and requested that the permissions for the folder be changed. On November 15, 2018, the permissions for the archived folder were modified to limit access to the folder to Transmission Function employees. There is no evidence that Merchant Function employees accessed the Non-Public Transmission Information while the proper access restrictions were not in place. This posting is being made out of an abundance of caution.
21	On April 7, 2021, it was discovered that an Xcel Energy Services Inc. employee classified as a Marketing Function employee had unauthorized access to nine Xcel Energy computer applications that contain non-public transmission function information. The employee had been granted access to the computer applications while in a previous, non-Marketing Function, position and access was not removed when the employee transferred to the Marketing Function role on April 1, 2021. Once the compliance team discovered this unauthorized access the applications were removed immediately. The Marketing Function employee has confirmed that he did not access the computer applications after becoming a Marketing Function employee. Further, during this brief 7-day

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	window the employee was in training and not trading.
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	XES believes no non-public transmission function information was accessed after the employee moved into a Marketing Function role and no non-public transmission function information was shared with or accessed by other Marketing Function employees. XES is posting this disclosure out of an abundance of caution.
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