

WeatherWise™

July 11, 2007

Mr. Thomas Pugh
Minnesota Public Utilities Commission
350 Metro Square Building
121 East Seventh Place
St Paul, MN 55101-2147

Re: In the Matter of a Commission Investigation into Xcel Energy's Fixed
Monthly Payment Pilot Program

Docket No. G-002/CI-07-541

In the Matter of a Commission Investigation into CenterPoint Energy's No
Surprise Bill Program

Docket No. G-008/CI-07-542

Dear Commissioner Pugh:

It has come to my attention that WeatherWise's methods and modeling have become lightning rods in the above-referenced Matters, distracting the focus of the Office of the Attorney General (OAG). WeatherWise has not intervened in these Matters and wishes to maintain its non-intervening status. Nonetheless, the PUC should be aware that WeatherWise has cooperated with the OAG, and that we wish to continue cooperating with the OAG. While we are not subject to jurisdiction of the PUC or the OAG, WeatherWise strongly believes in assisting the PUC and the OAG in this matter.

Based upon recent news reports, there appears to be confusion over the level of cooperation we have offered with respect to your investigation and the investigation in process in the OAG's organization. Contrary to the implications in recent articles, WeatherWise has cooperated with the OAG in every reasonable manner.

To date, we have supplied the OAG with a complete flow chart of our modeling system along with a high level overview of our methodology. We also have responded to each of the information requests directed to us by the OAG. We have assisted our clients in responding to numerous information requests directed to them as well. We have supplied the OAG with all of the requested data that is in our possession.

In fact, additional data has been available to the OAG for close to a month on our computer servers. We have told the OAG that the data is ready for its review, and that we stand ready to provide a password and remote access instructions. The OAG has

not called us to obtain a password or instructions. To our knowledge, there are no outstanding OAG information requests awaiting responses from WeatherWise.

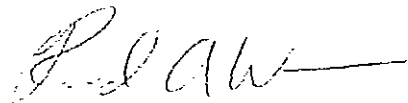
As we have stated before, we strongly believe that we should be assisting in this investigation. Our only concern, which has been stressed from the very beginning of this matter, is that any disclosure of our methods or modeling information to the public could diminish some or all of the value of our intellectual property. We have stated repeatedly that, given adequate protections, we are willing to disclose this information to Minnesota PUC staff. We extend the same offer to the PUC staff that we have already extended to the OAG. WeatherWise will permit the PUC to examine any relevant information we have, contact any employee, and ask us any questions regarding models, data and methods. Moreover, we are willing to travel at our own expense and answer questions in a one or two day advanced modeling seminar.

The protection we seek is the PUC's assurances that the PUC would protect all information discussed as trade secret non-public data under the Minnesota Data Practices Act. We cannot permit this information to be introduced into the public investigation, nor would we permit it to be made available to our clients, Energy Cents Coalition or any other party. In this matter, your staff would be free to share its opinion publicly on our modeling, provided the opinion does not divulge proprietary method details or give indication of the methods through abstract insinuation.

When asked in a June 2007 PUC proceeding, our counsel indicated that he believed we may be willing to work with a third party expert who could review our models and methods for biases or inappropriate padding of the consumer offers. We would welcome this evaluation, and we would be willing to pay the expert's fees. Our conditions for the use of this third party expert are: 1) The expert cannot be a Minnesota resident; 2) WeatherWise must consent to the expert's qualifications; 3) The expert must state an opinion only as to whether there is any inappropriate "padding" of offers, either by model flaws or by intentional effort, and cannot reveal any modeling, methodology or technology; and 4) the expert must sign a 10-year WeatherWise confidentiality and non-compete agreement.

Please feel free to contact me at any time to discuss this matter. I can be reached at 412.320.4060 or rwarsaw@weatherwiseusa.com.

Sincerely,



Rand A Warsaw
President

cc: All Parties of Record

In the Matter of a Commission Investigation into Xcel Energy's Fixed
Monthly Payment Pilot Program
Docket No. G-002/CI-07-541

In the Matter of a Commission Investigation into CenterPoint Energy's No
Surprise Bill Program
Docket No. G-008/CI-07-542

In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for
Approval of a Fixed Bill Option Tariff and Rule Variance
Docket No. G-002/M-05-393

In the Matter of the Petition of CenterPoint Energy for Approval to Continue the No Surprise Bill and Revise the
No Surprise Bill Tariff to Allow the Inclusion of Planned Rate Increases in the Bill
Docket No. G-008/M-05-602

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