



IN THE MATTER OF THE
APPLICATION OF PUBLIC SERVICE
COMPANY OF COLORADO FOR A
CERTIFICATE OF PUBLIC
CONVENIENCE AND NECESSITY
FOR THE PAWNEE – SMOKY HILL
345KV TRANSMISSION PROJECT

DOCKET NO: 07A-_____E

DIRECT TESTIMONY
AND EXHIBITS

October 31, 2007



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DIRECT TESTIMONY
AND EXHIBITS
OF

DOUG W. JAEGER

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO**

**IN THE MATTER OF THE APPLICATION OF)
PUBLIC SERVICE COMPANY OF)
COLORADO FOR A CERTIFICATE OF)
PUBLIC CONVENIENCE AND NECESSITY) DOCKET NO.
FOR THE PAWNEE – SMOKY HILL 345KV)
TRANSMISSION PROJECT)**

DIRECT TESTIMONY OF DOUG W. JAEGER

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Doug Jaeger. My business address is 414 Nicollet Mall, MP8,
4 Minneapolis, Minnesota 55401.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

6 A. I am employed by Xcel Energy Services Inc., the service company subsidiary of
7 Xcel Energy Inc., the registered public utility holding company parent of Public
8 Service Company of Colorado. My title is Vice President of Transmission.

9 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS DOCKET?**

10 A. I am testifying on behalf of Public Service Company of Colorado (“Public
11 Service” or the “Company”).

12 **Q. HAVE YOU PREPARED A STATEMENT OF YOUR EXPERIENCE AND
13 QUALIFICATIONS?**

14 A. Yes. That statement is included as Attachment A.

1 **Q. WHAT IS PUBLIC SERVICE SEEKING IN THIS APPLICATION?**

2 A. Public Service is seeking the Commission's approval to construct the Pawnee
3 – Smoky Hill 345kV Transmission Project, ("Pawnee – Smoky Hill Project" or
4 "Project"), a proposed 345kV transmission circuit running from Pawnee
5 Substation, near Brush Colorado, to the Smoky Hill Substation, located
6 southeast of the Denver metro area. The Company also seeks specific
7 findings from the Commission that the projected Electromagnetic Fields
8 ("EMF") and projected noise from the Pawnee – Smoky Hill Project are
9 reasonable.

10 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

11 A. The purpose of my testimony and the testimony of the other four Company
12 witnesses is to show that the Pawnee – Smoky Hill Project is consistent with
13 the public interest and should be approved by the Commission. I introduce
14 the other witnesses who are providing direct testimony on behalf of Public
15 Service on this Project and describe the Pawnee – Smoky Hill Project. I
16 address the effect of new legislation – including Senate Bill 07-100 ("SB 07-
17 100"), codified in relevant part at § 40-2-126, C.R.S., and House Bill 07-1281,
18 codified at § 40-2-124, C.R.S., – on this CPCN application. I explain
19 generally how the Pawnee – Smoky Hill Project will serve the twin goals set
20 forth at C.R.S. § 40-2-126(3)(a) of ensuring reliable delivery of electricity to
21 Colorado customers and helping Public Service to meet the new renewable
22 energy standard set forth in C.R.S. § 40-2-124

23 **Q. WHO HAS FILED DIRECT TESTIMONY AS PART OF THIS APPLICATION?**

1 A. Public Service is sponsoring the direct testimony of four additional witnesses.
2 Joseph Taylor, Manager, Transmission Access with Public Service, describes
3 the Energy Resource Zones the Company has designated as part of the
4 transmission plan it has filed contemporaneously with this Application under
5 C.R.S. § 40-2-126. He also presents testimony addressing the differences
6 between the timing of resource development verses new transmission for the
7 delivery of electricity to the Denver metro area.

8 Gerry Stellern, Manager of Transmission Reliability and Assessment
9 for Public Service, describes the Pawnee-Smoky Hill Project in detail,
10 explains the need for the Project, discusses the criteria used to evaluate
11 system alternatives, and presents Public Service's analysis and evaluation of
12 the system alternatives considered.

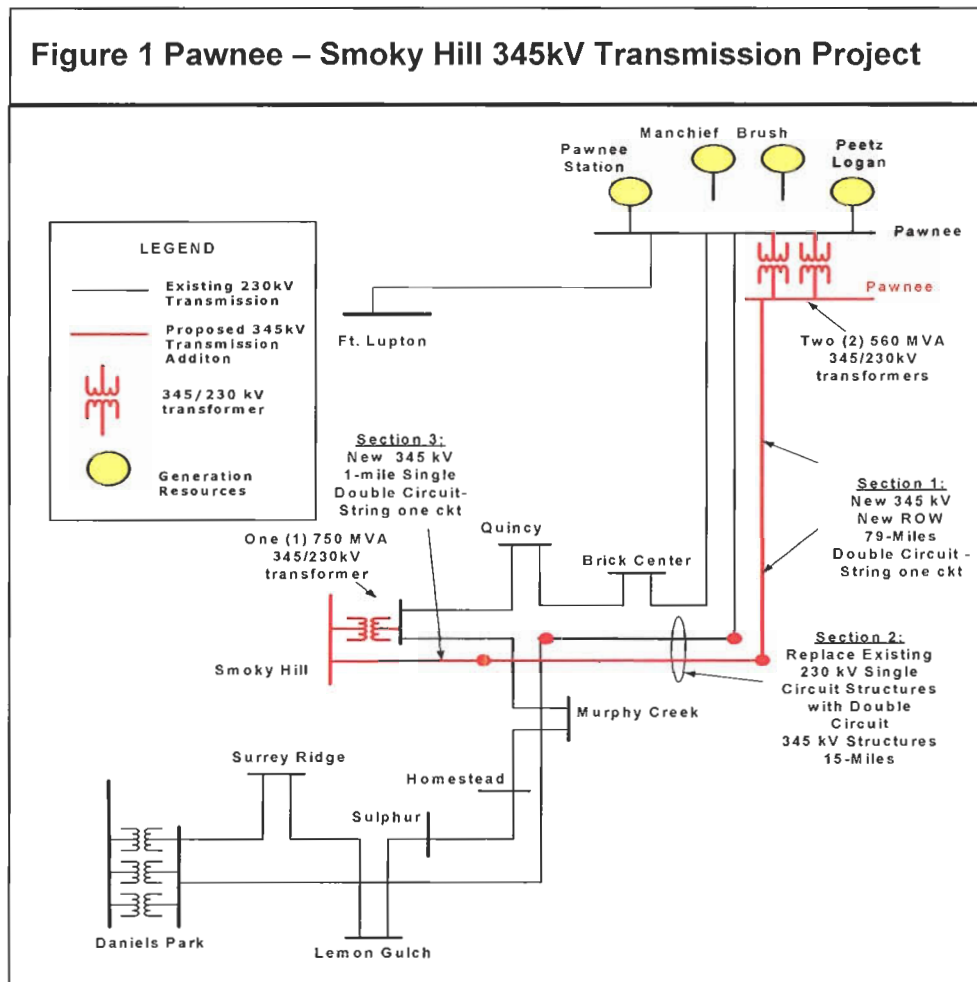
13 Danny Pearson, Principal Transmission Design Engineer with Public
14 Service, describes the construction techniques that will be used for the
15 Project. Mr. Pearson also discusses the prudent avoidance measures that
16 the Company proposes to mitigate projected EMF and presents analysis of
17 the projected noise impacts of the Pawnee – Smoky Hill Project and the
18 prudent measures the Company proposes to minimize noise levels. In
19 addition, Mr. Pearson explains the proposed configuration of the Pawnee –
20 Smoky Hill Project.

1 Rick Thompson, Supervisor, Siting and Permitting with Public Service,
2 describes the processes that the Company will employ to obtain the land
3 rights and local permits necessary to construct the Project.

4 II. PROJECT DESCRIPTION

5 Q. PLEASE DESCRIBE THE PAWNEE – SMOKY HILL PROJECT?

6 A. The Pawnee – Smoky Hill Project will result in approximately 95 miles of
7 345kV transmission circuit from the Pawnee Substation, near Brush, to the
8 Smoky Hill Substation located southwest of the Denver metro area. The
9 entire project is depicted in Figure No. 1 below:



1 The Project consists of three sections. The first section consists of
2 approximately 79 miles of new transmission running south from Pawnee
3 Substation and will require the acquisition of new right-of-way ("ROW"). The
4 second section is approximately 15 miles long and will be built in an existing
5 Public Service transmission corridor. For this section, an existing 230kV line
6 will be replaced with double-circuit 345kV capable transmission facilities.
7 One circuit will be used to complete the new Pawnee – Smoky Hill 345kV
8 circuit. The other circuit will be used to carry the existing 230kV circuit and
9 will continue to be operated at 230kV. The third section is the last mile into
10 Smoky Hill Substation and consists of new double circuit 345kV capable
11 transmission facilities. Although the Last Mile Section requires new
12 construction, the Company will use its ROW adjacent to existing 230kV lines
13 for this Section of the Project. In addition to these three sections, the Project
14 will require new 345kV switchyards at Pawnee and at Smoky Hill.

15 **Q. DO YOU HAVE ADDITIONAL EXHIBITS THAT SHOW THE PAWNEE–**
16 **SMOKY HILL PROJECT?**

17 A. Yes. Exhibit No. DWJ-1 is a map of the Colorado transmission network and
18 provides perspective of the Project in relation to the overall bulk power
19 transmission system. Exhibit No. DWJ-2 is a map of the Denver metro
20 transmission system and shows where the Pawnee – Smoky Hill Project will
21 terminate in the south Denver metro area.

1 **Q. WHAT IS THE GENESIS OF THE PAWNEE – SMOKY HILL PROJECT?**

2 A. The Pawnee – Smoky Hill Project is being proposed under the recently
3 enacted SB 07-100, codified at § 40-2-126, C.R.S. The Project is a critical
4 component of a comprehensive long-term transmission plan for relieving
5 transmission constraints that hinder the development of new generation
6 resources in northeastern Colorado and southern Wyoming, particularly
7 renewable resources.

8 In enacting SB 07-100, the Colorado General Assembly recognized
9 that the demand and reliance on electricity is growing in Colorado, not just for
10 Public Service but also for our neighboring utilities. SB 07-100 therefore
11 directed us and other rate-regulated electric utilities, to turn our attention to
12 the transmission infrastructure needed to meet this growing demand and to
13 do so in a way that also meets Colorado's desire to expand our reliance on
14 renewable generation resources. Public Service is dedicated to investing in
15 transmission for Colorado in a way that supports the development of
16 beneficial environmentally-friendly resources, is cost-effective and, where
17 appropriate, is regional in scope. We view SB 07-100 as providing the
18 legislative and regulatory framework to encourage us to move forward with
19 plans to invest in such transmission expansion.

20 **Q WHAT DOES SB 07-100 REQUIRE?**

21 A. Under SB 07-100, on or before October 31, 2007, and every two years
22 thereafter, the Company is required to:

23 (a) Designate Energy Resource Zones,

- 1 (b) Develop plans for the construction or expansion of
2 Transmission facilities necessary to deliver electric power
3 consistent with the timing of the development of
4 beneficial energy resources located in or near such
5 zones;
6
7 (c) Consider how transmission can be provided to
8 encourage local ownership of renewable energy facilities,
9 whether through renewable energy cooperatives as
10 provided in section 7-56-210, C.R.S., or otherwise; and
11
12 (d) Submit proposed plans, designations, and applications
13 for certificates of public convenience and necessity to the
14 commission for simultaneous review pursuant to
15 subsection (3) of this section.
16

17 Accordingly, consistent with this legislation, contemporaneously with this filing,
18 the Company is making a companion filing to the Commission designating
19 four geographic areas as Energy Resource Zones (“ERZs” or “Zones”) and
20 describing the Company’s short-term and long-term plans for relieving
21 transmission constraints that either hinder the delivery of electricity to
22 Colorado consumers, the development of new electric generation resources
23 to serve Colorado consumers, or both, as required by the statute.

24 In our companion filing, the large geographic area encompassing
25 northeastern Colorado has been designated as Energy Resource Zone 1
26 (Zone 1). As shown in that filing, the Pawnee – Smoky Hill Project is part of
27 the Company’s longer-term plan to relieve transmission constraints in Zone 1
28 so as to allow for development of new electric generation resources,
29 particularly wind resources in that area. The Project is expected to require
30 approximately five years to construct, so the earliest time when the Project
31 could be ready for service would be 2013.

1 **Q. HOW DID PUBLIC SERVICE DESIGNATE THE FOUR ENERGY**
2 **RESOURCE ZONES THAT ARE DISCUSSED IN YOUR COMPANION**
3 **FILING?**

4 A. As Mr. Taylor describes in greater detail in his testimony, in order to identify
5 Energy Resource Zones, the Company took many factors into account.
6 These included the existing transmission constraints of each geographic area
7 and the results of studies performed by the Company in response to
8 generation interconnections requests received over the last few years as part
9 of the large-generator interconnection process we follow to comply with FERC
10 regulations. In addition, at the request of various stakeholders who
11 participated in workshops conducted by Public Service to facilitate the
12 development of its October 31, 2007 SB 07-100 filings, the Company
13 considered, 1) information compiled by the National Renewable Energy Lab
14 (NREL) regarding the potential for renewable resource development in
15 Colorado; 2) the results of a study conducted by WindLogic focusing
16 particularly on the potential for wind-resource development in Colorado; and 3)
17 specific information regarding the location of potential new renewable energy
18 resources that was provided to the Company by the stakeholders during the
19 workshop process.

20 **Q. HOW DID THE COMPANY ASSESS THE TRANSMISSION NEEDS FOR**
21 **EACH OF THE DESIGNATED ZONES?**

22 A. Public Service identified both short-term and long-term transmission
23 expansion plans that will alleviate transmission congestion in all four zones.

1 Under Rule 3206 of the Commission's Rules Regulating Electric Utilities the
2 Company is permitted to make certain types of modifications to expand the
3 capacity of existing transmission facilities without the need to file an
4 application for CPCN because such modifications are deemed to be in the
5 ordinary course of business. The short-term projects that are part of our
6 overall transmission expansion plan all fall within the scope of Rule 3206's
7 exemption from the CPCN requirement. Our short-term transmission plans
8 will increase the overall level of Pawnee area generation that can be
9 delivered to the Denver metro load center. However, because over the long-
10 term we expect that there will continue to be new generation resources
11 constructed in Zone 1, the Company has also identified longer-term
12 transmission plans that will accommodate a higher level of Pawnee area
13 generation.

14 **Q. HOW DOES THE PAWNEE – SMOKY HILL PROJECT FIT IN WITH**
15 **PUBLIC SERVICE'S VISION?**

16 A. The Pawnee – Smoky Hill Project is consistent with our vision of creating a
17 transmission highway for delivering cost-effective and environmentally-
18 friendly energy resources to Colorado consumers. Eventually, we see the
19 Pawnee – Smoky Hill Project as being one component of what will likely be a
20 345kV transmission backbone extending from Pawnee Substation south to
21 Comanche Substation. Zone 1 has been identified as one of the Zones with
22 significant potential for the development of wind resources in particular. Any
23 significant development of new electric generation capacity in Zone 1 will

1 either be developed near Pawnee, or require that transmission be built to
2 Pawnee Substation. In order to facilitate the development of resources at or
3 delivered to Pawnee, upgrades must be made to allow those resources to be
4 delivered to customer loads. We are recommending new transmission
5 facilities be built between Pawnee Substation and the Denver metro area.

6 **Q. DOES PUBLIC SERVICE ALSO EXPECT TO PURSUE TRANSMISSION**
7 **EXPANSION PLANS IN ZONES 2, 3 AND 4?**

8 A. Yes. As I have already stated, Public Service has plans for transmission
9 development for each of the designated Energy Resource Zones. As a
10 Company policy and practice, Public Service considers various alternatives in
11 developing transmission plans and tries to determine the most cost effective
12 and efficient way of addressing its needs, as we have done in this CPCN. In
13 order to develop greater transmission access to ERZs 2 and 3, Public Service
14 is studying the feasibility of participating in the Eastern Plains Transmission
15 Project ("EPTP") currently being developed by Tri-State Generation and
16 Transmission Association, Inc. ("TSGT") and Western Area Power
17 Administration. Public Service has recently executed a Memorandum Of
18 Understanding with TSGT to begin this assessment.

19 Depending upon the results of these feasibility studies, Public Service
20 expects to join in the EPTP to expand transmission into Zones 2 and 3.
21 Although the Company has not had sufficient time since the enactment of SB
22 07-100 to complete the feasibility and other studies required to make a formal
23 proposal for the expansion of transmission to Zones 2 and 3 at this time, we

1 expect to join in an application for CPCN that TSGT expects to file relating to
2 the EPTP. We believe it is in the best interests of Colorado consumers to
3 pursue opportunities for joint transmission development and not pursue
4 duplicative transmission facilities in and around these zones.

5 In order to expand transmission capacity to Zone 4 in Southern
6 Colorado, we will pursue a single short-term project that should facilitate the
7 development of new solar generation from that area in the fairly near term.

8 **III. THE EFFECT OF RECENT LEGISLATION ON THIS CPCN APPLICATION**

9 **Q. HOW DOES SB 07-100 AFFECT THIS CPCN APPLICATION AND OTHER** 10 **TRANSMISSION-RELATED APPLICATIONS GOING FORWARD?**

11 A. Colorado Revised Statutes § 40-2-126(3) sets forth a new standard for
12 approval of a CPCN for the construction or expansion of transmission
13 facilities necessary to deliver electric power consistent with the timing of the
14 development of beneficial energy resources located in or near designated
15 Energy Resource Zones. As I allude to above, under C.R.S., § 40-2-126, the
16 Commission shall approve a CPCN filed pursuant to C.R.S. § 40-2-126(2)(b)
17 if it finds that:

18 (a) The construction or expansion is required to ensure the reliable
19 delivery of electricity to Colorado consumers or to enable the
20 utility to meet the renewable energy standards set forth in
21 section 40-2-124; and

22
23 (b) That the present or future public convenience and necessity
24 require such construction or expansion.

1 **Q. IN PUBLIC SERVICE’S VIEW HOW DOES THE STANDARD SET FORTH**
2 **IN C.R.S. § 40-2-126(3) DIFFER FROM THE STANDARD SET FORTH IN**
3 **C.R.S. § 40-5-101(1).**

4 A. Public Service believes that SB 07-100 encourages utilities to plan, develop
5 and build transmission facilities to serve not only the “present” public need,
6 but also the “future” need. Further, the new legislation expressly directs the
7 Commission to consider the extent to which new transmission will be required
8 to allow the Company to meet the renewable energy portfolio standards set
9 forth in C.R.S. § 40-2-124. Taken together these provisions reflect the
10 Colorado legislature’s recognition of the need for transmission planning to
11 move out in front of the development of generation resources in order to
12 ensure successful development of new renewable generation in Colorado.
13 The new legislation affords our Company greater flexibility to seek CPCN
14 approval for transmission projects that must be commenced now to serve
15 expected generation capacity in the future.

16 Public Service believes that the Colorado Legislature passed SB 07-
17 100 in part to address the fact that the timeline from CPCN to in-service date
18 for a transmission line project can be five years or longer, whereas certain
19 generation facilities can be placed in service in less than two years. This is
20 why the legislation calls for utilities to (1) designate geographic areas in which
21 transmission constraints hinder the delivery of electricity to Colorado
22 consumers, the development of new electric generation facilities to serve
23 Colorado consumers, or both, (2) develop plans to construct the transmission

1 facilities necessary to deliver electric power consistent with the timing of the
2 development of beneficial energy resources located in or near such zones,
3 and (3) the submittal of CPCN for the construction or expansion of
4 transmission to reliably deliver electricity or to meet the Renewable Energy
5 Standard.

6 **Q. DOES THIS MEAN PUBLIC SERVICE IS FREE TO BUILD TRANSMISSION**
7 **REGARDLESS OF NEED OR GENERATION RESOURCE PLANNING?**

8 A. No. As SB 07-100 states, Public Service must demonstrate a present or
9 future need for the subject transmission facilities, and that the facilities are
10 required to ensure either electric delivery reliability or to meet the statutory
11 renewable energy standard. The Company believes that any CPCN
12 application must be grounded in reality in terms of expected generation
13 resources that will deliver power over the transmission facilities, forecasted
14 electric demand, and reasonable cost. As I've stated previously, in regions
15 where there other utilities are pursuing plans to expand transmission capacity,
16 Public Service believes the correct approach, for the benefit of Colorado
17 consumers, is to explore partnering with such other utilities as opposed to
18 planning, developing and constructing duplicative transmission facilities.

19 **Q. HOW DOES HOUSE BILL 07-1281 AFFECT THIS CPCN APPLICATION?**

20 A. House Bill 07-1281 doubles the renewable energy standard that the voters
21 passed with Amendment 37. Pursuant to C.R.S. § 40-2-124, investor-owned
22 utilities must generate, or cause to be generated, the following minimum
23 amounts of electricity:

- 1 • Five percent of its retail electricity sales in Colorado for the
- 2 years 2008 through 2010;
- 3 • Ten percent of its retail electricity sales in Colorado for the
- 4 years 2011 through 2014;
- 5 • Fifteen percent of its retail electricity sales in Colorado for
- 6 the years 2015 through 2019; and
- 7 • Twenty percent of its retail electricity sales in Colorado for
- 8 the years 2020 and thereafter.

9
10 Currently, Public Service is contracting for the 400 megawatt Peetz Logan
11 Energy Center (“Energy Center”) that is now being built in Logan County as a
12 result of the 2003 LCP and follow-on all-source RFP, and it is expected to be
13 completed by the end of 2007. In addition, Public Service has received
14 several interconnection requests for wind-related facilities proposed to be built
15 in Zone 1. Generation from the Energy Center and other wind facilities will
16 help the Company meet the doubled renewable energy standard. And new
17 wind resources would benefit from the capability of the Pawnee – Smoky Hill
18 Project for delivery.

19 **Q. ARE THERE ANY OTHER IMPACTS OF HOUSE BILL 07-1281?**

20 A. Yes. House Bill 07-1281 obligates cooperative utilities and well as municipal
21 utilities of a certain size to comply with acquiring certain levels of renewable
22 energy. Public Service has the obligation of offering to our wholesale
23 customers their load ratio share of the renewable energy we acquire if the
24 wholesale customer is willing to pay the full costs of those renewable
25 resources. We expect all our wholesale customers will elect to subscribe to
26 the non-solar renewable resources that Public Service acquires. This
27 requires Public Service to acquire additional renewable resources for
28 purposes of meeting the Renewable Energy Standard (“RES”) called for

1 under HB 07-1281. As I have already stated, it is highly likely that additional
2 renewable resources will be located in or near Zone 1.

3 **Q. HOW DOES THE TIMING OF THIS PROJECT COMPARE TO THE**
4 **COMPANY'S EXPECTED RESOURCE ACQUISITIONS UNDER THE**
5 **COLORADO RESOURCE PLAN?**

6 A. As the Company expects to explain in its Colorado Resource Plan filing that
7 will be made within the next few weeks, the Company has already acquired
8 sufficient renewable resources to meet it's the new standard through 2020.
9 However, beginning in 2021 the Company will require the addition of
10 significant amounts of new renewable resources in order to remain in
11 compliance with the new RES. In order to prudently respond to that future
12 need for new renewable generation resources, the Company will propose to
13 begin to add incremental amounts of renewable resources to its portfolio
14 commencing as early as 2010. Public Service believes that integrating new
15 renewable resources gradually verses all at once in 2021 is better for system
16 reliability. The timing of this Project will be consistent with the timing for
17 acquiring renewable energy generation as set forth in the Company's
18 preferred resource acquisition plan. It takes approximately 60 months to
19 construct a new transmission line once the CPCN is granted. Therefore, it is
20 necessary for us to obtain approval of this Project now if we are to be in a
21 position to deliver electricity from expected new renewable or other
22 generation in Zone 1 beyond the short term expansion capacity to Colorado
23 consumers beginning in 2013 and beyond.

1 **Q. WHY DOES PUBLIC SERVICE BELIEVE THAT THE PAWNEE – SMOKY**
2 **HILL PROJECT SERVES THE PUBLIC CONVENIENCE AND NECESSITY?**

3 A. The Pawnee Substation is now and will continue to be a major gathering point
4 for funneling electricity from Zone 1 into the Denver metro area. As Mr.
5 Stellern discusses, there are constraints in the transmission network out of
6 the Pawnee area that limit the transfer of electric power into the Denver metro
7 area from this Pawnee gathering point. Therefore, in order to accommodate
8 new resources in the Pawnee area new transmission upgrades must be made.

9 As Mr. Taylor testifies and as shown in the Company's companion
10 filing filed contemporaneously under C.R.S. § 40-2-126, the Company has
11 identified significant potential for new generation resources, including
12 significant wind resource potential in Zone 1. As we approach future
13 acquisitions of new wind generation resources as proposed in our 2007
14 Colorado Resource Plan to be filed later in November, it is reasonable to
15 expect that a significant amount of those resources will be located in Zone 1.
16 However, the only way the Company can accommodate the injection of new
17 wind generation after 2013 into the Pawnee Substation, would be to begin
18 construction of this Project in 2008.

19 With the passage of SB 07- 100, Public Service was encouraged to
20 seek a CPCN so it can begin the multi-year process of evaluating corridor
21 alternatives, project design, project siting and routing, public notification,
22 obtaining local government approval and right of way rights, if necessary, and
23 construction of the Project. Again, Public Service believes that SB 07-100

1 encourages utilities to plan, develop and build transmission facilities to serve
2 not only the present public need, but also the future need.

3 **Q. WILL THE PAWNEE - SMOKY HILL PROJECT ALSO ENHANCE THE**
4 **RELIABILITY OF PUBLIC SERVICE'S EXISTING TRANSMISSION SYSTEM?**

5 A. Yes. As Mr. Stellern testifies in greater detail the Project provides system
6 benefits beyond the future needed capacity for new resources in or near Zone
7 1. In particular, it will reduce the stresses on the existing lower voltage
8 transmission facilities and will increase flexibility for system maintenance of
9 transmission lines in the area of the Pawnee Substation and will provide an
10 alternative transmission pathway to accommodate outages due to equipment
11 failure or weather in this area.

12 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

13 A. Yes.

Attachment A

Statement Of Qualifications

Douglas W. Jaeger

I have an undergraduate degree from St. John's University in Collegeville, Minnesota, and a Masters in Business Administration from the University of St. Thomas in St. Paul, Minnesota. I've held my current position at Xcel Energy since 2004. Prior to managing the Transmission area, I was Vice President of Business Operations where I managed several areas, including gas transmission, appliance services, outdoor lighting and damage prevention. Prior to that, I served as Vice President of Business Marketing and Sales for Xcel Energy, managing relationships with business customers for the four Xcel Energy operating companies. Before joining Xcel Energy in 2000 I was Director of Market Development for Exelon Corporation in Chicago, Illinois. I've also held positions with Honeywell, Inc., and Chubb Group of Insurance Companies. I serve on the board of the Midwest Reliability Organization, headquartered in St. Paul, Minnesota.