June 25, 2018

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket E017/GR-15-1033

Dear Mr. Wolf:

Attached are the *Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Otter Tail Power Company Compliance Filing—Decoupling Report

The Decoupling Report was filed on March 30, 2018 by:

Brian Boss
Regulatory Administration, Pricing Analyst
Otter Tail Power Company
215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496

Based on our review, the Department recommends that the Minnesota Public Utilities Commission (Commission) **accept Otter Tail's Decoupling Report, but not require the Company to implement a revenue decoupling mechanism**.

The Department is available to answer any questions that the Commission may have.

Sincerely,

/s/ CHRISTOPHER T. DAVIS
Analyst Coordinator

CTD/lt
Attachment

COMMERCE DEPARTMENT

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. E017/GR-15-1033

I. BACKGROUND

In Otter Tail Power Company's (Otter Tail or the Company) 2015 rate case, Docket No. E017/GR-15-1033, Fresh Energy witnesses Mark Lowry and Kaja Rebane proposed that Otter Tail implement a revenue decoupling mechanism (RDM) for the Company's residential, farm and general service customers to remove the Company's disincentive to implement distributed generation and demand-side management (DSM) resources.

In its May 1, 2017 *Findings of Fact, Conclusion and Order* the Minnesota Public Utilities Commission (Commission) stated:

> Instead, the Commission will accept Otter Tail's offer to research alternative rate design—and to work with stakeholder groups in this effort—culminating in an alternative rate design proposal. Specifically, by April 1, 2018, Otter Tail must prepare a report analyzing the potential customer impacts of Fresh Energy's proposed revenue-decoupling mechanism for the Residential, Farm, and Small General Service rate classes. The report must include a comparison of actual 2016 and 2017 revenues to 2016 Test Year baseline revenues (with baseline revenue per customer calculated using the final rates, sales, and customer counts of this rate case). And it must include a comparison of actual 2014 and 2015 revenues to 2009 baseline revenues (baseline revenue per customer calculated using the final rates, sales, and customer counts from Otter Tail's 2010 rate case). Interested parties will be invited to file comments on the report to address how any proposed change would affect specific customers or classes, and potential strategies for implementing a decoupling mechanism for Otter Tail, among other matters.

On April 1, 2018, the Company submitted its Decoupling Report Compliance Filing (Decoupling Report).

In its April 25, 2018 *Notice of Comment Period*, (Notice) the Commission stated that the issue for the comment period was what action, if any, should the Commission take regarding possible implementation of a decoupling mechanism for OTP. The Notice further identified the following topics open for comment:

- Does Otter Tail's March 30, 2018 Decoupling Report comply with the Commission's May 1, 2017 Order?
- Has Otter Tail's Decoupling Report provided enough historical analysis to assess ratepayer impact had decoupling been in place?
- Should the Commission order implementation of a decoupling pilot for Otter Tail?
- If the Commission orders implementation, what type of decoupling pilot should be implemented, what customer classes should be included and when should decoupling go into effect?
- Are there other issues or concerns related to this matter?

On June 20, 2018, in response to questions about the Decoupling Report from the Minnesota Department of Commerce, Division of Energy Resources (Department), Otter Tail submitted a Supplemental Compliance Filing.

II. DEPARTMENT ANALYSIS

Minnesota Statutes § 216B.2412 defines decoupling as a regulatory tool designed to separate a utility's revenue from changes in energy sales. The Statute states that the purpose of decoupling is to reduce a utility's disincentive to promote energy efficiency. Subdivision 2 of the Statute establishes criteria for an RDM:

> The commission shall, by order, establish criteria and standards for decoupling. The commission may establish these criteria and standards in a separate proceeding or in a general rate case or other proceeding in which it approves a pilot program, and shall design the criteria and standards to mitigate the impact on public utilities of the energy-savings goals under section 216B.241 without adversely affecting utility ratepayers. In designing the criteria, the commission shall consider energy efficiency, weather, and cost of capital, among other factors.

The Statute requires that an RDM balance the goals of eliminating a utility's throughput incentive[1] with protecting ratepayers.[2] Eliminating the throughput incentive, in a revenue per customer (RPC) decoupling mechanism as proposed by Fresh Energy and implemented by other investor-owned utilities (IOUs) in Minnesota, is achieved by allowing IOUs to true up their revenues on an annual basis so that the IOU receives the RPC authorized in its rate case. If the RDM does not have a cap, the utility recovers the amount of revenues authorized, no more and no less.

The Commission has not approved an RDM without a cap because the Commission has determined that a cap is needed so that ratepayers are not adversely impacted.

If a cap is present, the utility is limited in the size of the surcharge and/or refund implemented. Currently, Minnesota Energy Resources Corporation (MERC) is the only Minnesota IOU with a symmetrical cap. Xcel Electric, Center Point Energy, and Great Plains Natural Gas all have asymmetrical caps (the surcharges allowed are capped, but the refunds are not capped.) Implementing a cap, however, results in an IOU receiving more or less than it needs to for eliminating the throughput incentive. For example, surcharges under an asymmetrical cap could result in a utility under-collecting the revenues needed to make it indifferent to customer implementation of energy savings projects or distributed generation if the actual surcharges needed exceed the cap. Although a symmetrical cap is thought to treat surcharges and refunds more fairly if they are both capped at the same percentage, the Minnesota Department of Commerce, Division of Energy Resources' (Department or DOC) analysis of MERC's implementation of its symmetrical cap during the period 2013-2017 indicates that MERC's decoupled customers were surcharged $1.9 million more than if there had not been a cap.[3] Clearly, this outcome harms ratepayers.

The Department discusses the balance of eliminating the utility's throughput incentive and protecting ratepayers further below.

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[1] Under traditional regulation the Commission sets a utility's rates based on a weather normalized revenue requirement. Once rates are set, the utility's financial performance depends on its levels of sales and its ability to manage its costs. Because of the high fixed costs associated with the natural gas and electric utility industries, a utility's marginal revenue (i.e., price) significantly exceeds its short-run marginal costs. Therefore, a utility has an incentive to increase sales. This phenomenon is referred to as the "throughput incentive." Currently, Otter Tail has a throughput incentive because the Company can increase its profits by selling more electricity.

[2] The Department concludes that a customer can be adversely impacted in two ways. First, the customer could be surcharged an amount significantly higher than it would have been absent an RDM. Second, the customer could encounter increased volatility in its rates.

[3] See May 8, 2018 Direct Testimony of Christopher T. Davis, *In the Matter of the Application of Minnesota Energy Resources Corporation for Authority to Increase Rates for Natural Gas Service in Minnesota,* p. 25-26.

A. DOES OTTER TAIL'S MARCH 30, 2018 DECOUPLING REPORT COMPLY WITH THE COMMISSION'S MAY 1, 2017 ORDER?

The Department addresses each requirement of the Commission's Order in turn.

1. *Otter Tail will work with stakeholder groups in its research of alternative rate designs.*

The Department did not participate in discussions on Otter Tail's Decoupling Report prior to its submittal. The Department is unaware if the Company worked with other stakeholder groups in the preparation of the Decoupling Report.

2. *Otter Tail will submit a report by April 1, 2018.*

Otter Tail submitted its Decoupling Report on March 30, 2018, thus Otter Tail submitted the Decoupling Report in a timely manner.

3. *Otter Tail's report must include a comparison of actual 2016 and 2017 revenues to 2016 Test Year baseline revenues (with baseline revenue per customer calculated using the final rates, sales, and customer counts of this rate case).*

Table 6 of the Decoupling Report, page 24, included a comparison of 2017 Actual Residential Results to the Company's 2017 Test Year. Table 8 (page 31) included a comparison of 2017 General and Small General Service Classes' actual results to the 2016 Test Year. The Report did not include a comparison of actual 2016 revenues to 2016 Test Year baseline revenues. However, the Company included the comparison in its June 20, 2018 Supplemental Compliance Filing.

4. *Otter Tail's report must include a comparison of actual 2014 and 2015 revenues to 2009 baseline revenues (baseline revenue per customer calculated using the final rates, sales and customer counts from Otter Tail's 2010 rate case.)*

Table 7, page 30 of the Decoupling Report included a comparison of 2015 and 2016 Residential and Farm Classes' actual results to the 2009 Test Year. Table 8, page 31 of the Decoupling Report, included a comparison of 2015 and 2016 Residential and Farm Classes' actual results to the 2016 Test Year. The Decoupling Report did not include a comparison of 2014 Actual Results to the 2009 Test Year.

5. Department conclusion

The Department concludes that Otter Tail provided a reasonable level of the data required in the Commission's May 1, 2017 Order.

B. ADEQUACY OF OTTER TAIL'S ANALYSIS

One of the main purposes of the Decoupling Report was to assess how an RDM would have impacted ratepayers had it been in force since 2009. Otter Tail's Decoupling Report and Supplemental Compliance Filing provided an analysis of what the ratepayer impact would have been had an RDM with a three percent cap been implemented historically.

The Department concludes that Otter Tail's Decoupling Report and Supplemental Compliance Filing provided a reasonable analysis of the impact of an RDM over the years 2010-2017.

Table 1 below summarizes the Residential and Farm customer classes', and General Service customer classes' annual surcharges/(refunds) that would have occurred for 2010-2017 had the RDM proposed by Fresh Energy been in place. For each of the two customer classes, Table 1 also shows the annual surcharge/(refund) for an average customer in the customer classes.

Table 1: Otter Tail Surcharges/(Refunds) Assuming Fresh Energy's Proposed RDM had been in Place 2010-2017

	No Cap[4]		Symmetrical 3%		Asymmetrical 3%	
	Surcharges/ (Refunds)	**Annual Cost Per Customer**	**Surcharges/ (Refunds)**	**Annual Cost Per Customer**	**Surcharges/ (Refunds)**	**Annual Cost Per Customer**
	Residential & Farm	Residential & Farm	Residential & Farm	Residential & Farm	Residential & Farm	Residential & Farm
2010	$2,940,028	$59.28	$763,237	$15.36	$763,237	$15.36
2011	($199,068)	($4.08)	($199,068)	($4.08)	($199,068)	($4.08)
2012	$1,631,038	$32.28	$794,303	$15.72	$794,303	$15.72
2013	($76,502)	($1.56)	($76,502)	($3.72)	($76,502)	($3.72)
2014	($522,698)	($10.68)	($522,698)	($10.68)	($522,698)	($10.68)
2015	$1,813,604	$36.36	$822,603	$16.44	$822,603	$16.44
2016	$3,434,054	$68.28	$945,093	$18.72	$945,093	$18.72
2017	$2,233,163	$41.64	$991,583	$18.48	$991,583	$18.48
2010-2017	$11,253,619		$3,518,551		$3,518,551	
	General Service	General Service	General Service	General Service	General Service	General Service
2010	$1,473,642	$143.88	$483,852	$47.28	$483,852	$47.28
2011	$1,234,486	$118.08	$484,811	$46.32	$484,811	$46.32
2012	$1,757,593	$165.12	$484,566	$45.48	$484,566	$45.48
2013	$719,043	$68.16	$513,692	$48.60	$513,692	$48.60
2014	$327,161	$31.32	$327,161	$31.32	$327,161	$31.32
2015	$1,221,199	$114.96	$529,277	$114.96	$529,277	$114.96
2016	$1,341,182	$125.04	$622,022	$125.04	$622,022	$125.04
2017	$541,557	$50.52	$541,557	$50.52	$541,557	$50.52
2010-2017	$10,066,329		$4,469,114		$4,469,114	
Total	$21,319,948		$7,987,665		$7,987,665	

[4] Calculating an RDM without a cap indicates the actual changes in revenues, no more and no less, needed to eliminate the utility's throughput incentive

1. Residential and Farm

Table 1 shows that Otter Tail's implementation of an RDM for the Residential and Farm customer classes would have resulted in a refund for only three years of the period analyzed (2010-2017). Because the refunds never exceeded the three percent cap, the total refunds would have been the same whether the RDM had no cap, a symmetrical three percent cap, or an asymmetrical three percent cap.[5]

Assuming implementation of the three percent symmetrical cap proposed by Fresh Energy, Otter Tail's analysis indicated that the Company would have refunded residential and farm customer a total of $798,268, and surcharged a total of $4,316,819, for a net surcharge of $3,518,551. Residential customers would have received an annual refund as high as $10.68 in 2014 and an annual surcharge of $18.72 in 2016.

Without a cap, Residential and Farm customers would have paid $12,051,887 in surcharges and received $798,268 in refunds, for net surcharges of $11,253,619 over the 2010-2017 period. Residential customers would have received an annual refund as high as $10.68 in 2014 and an annual surcharge of $68.28 in 2016.
Table 2 below shows the Residential and Farm customers' surcharges/(refunds) under an RDM with no cap as a percent of forecasted net revenues.

Table 2: Residential and Farm RDM Surcharges/(Refunds) Assuming No Cap As a Percent of Net Revenues (2010-2017)

	Surcharges/ (Refunds) Assuming No Cap	Forecasted Net Revenues	Surcharge/(Refund) Without Cap as percent of Net Revenues
2010	$2,940,028	$25,441,236	12%
2011	($199,068)	$27,353,905	(1%)
2012	$1,631,038	$26,476,764	6%
2013	($76,502)	$27,969,455	0%
2014	($522,698)	$27,831,460	(2%)
2015	$1,813,604	$27,420,099	7%
2016	$3,434,054	$31,503,106	11%
2017	$2,233,163	$33,052,767	7%

As can be seen, Otter Tail would have surcharged Residential and Farm customers a substantial amount during 2010-2017 for the years 2010, 2012, 2015, 2016, and 2017. The Department

[5] An asymmetrical cap would impose a three percent cap on surcharges, but no cap on refunds.

does not believe that Residential and Farm customer cost increases of 6-12 percent would be reasonable, thus any RDM for Otter Tail would have needed a cap.

Table 3 below shows the percent of throughput incentive that application of an RDM with a three percent symmetrical or asymmetrical cap would have achieved for 2010-2017.

Table 3: Percentage Elimination of Throughput Incentive Under RDM With Symmetrical or Asymmetrical 3% Cap for Residential and Farm Customers

	Surcharges/Refunds 3% Cap	Surcharges/ (Refunds) Without Cap	Throughput Incentive Eliminated
2010	$763,237	$2,940,028	26%
2011	($199,068)	($199,068)	100%
2012	$794,303	$1,631,038	49%
2013	($76,502)	($76,502)	100%
2014	($522,698)	($522,698)	100%
2015	$822,603	$1,813,604	45%
2016	$945,093	$3,434,054	28%
2017	$991,583	$2,233,163	44%
2010-2017	$3,518,551	$11,253,619	31%

A review of Table 3 indicates that implementation of an RDM with a three percent symmetrical or asymmetrical cap would have reduced the Company's Residential and Farm throughput incentive by 31 percent over the period. Although the 31 percent reduction is significant, the Department would be more comfortable with an RDM that eliminated more than 50 percent of the throughput incentive.

2. General Service Customer Class

Table 1 above shows that Otter Tail's implementation of an RDM for the General Service customer classes would have resulted in only surcharges for the period 2010-2017. Assuming implementation of a three percent symmetrical cap, Otter Tail's analysis indicates that the Company would have surcharged the General Service customer classes a total of $4,469,114. The average General Service customer would have been surcharged a low of $31.32 in 2014 and $125.04 in 2016.

Without a cap, General Service customer classes would have paid $10,066,329 in surcharges over the 2010-2017 period. The average General Service customer would have been surcharged a low of $31.32 in 2014 and a high of $165.12 in 2016.

Table 4 below shows the General Service customers' surcharges/(refunds) under an RDM with no cap as a percent of forecasted net revenues.

Table 4: General Service RDM Surcharges/(Refunds) Assuming No Cap As A Percent of Net Revenues (2010-2017)

	Surcharges/ (Refunds)	Forecasted Net Revenues	Surcharge/(Refund) Without Cap as percent of Net Revenues
2010	$1,473,642	$16,128,395	9%
2011	$1,234,486	$16,160,365	8%
2012	$1,757,593	$16,152,198	11%
2013	$719,043	$17,123,073	4%
2014	$327,161	$17,278,472	2%
2015	$1,221,199	$17,642,577	7%
2016	$1,341,182	$20,734,074	6%
2017	$541,557	$21,500,049	3%

As can be seen, Otter Tail would have surcharged General Service customers more than three percent in every year except 2014 and 2017. The Department does not believe that General Service cost increases of 6-11 percent would be reasonable, thus any RDM for Otter Tail General Service customers would have needed a cap.

Table 5 below shows the percent of throughput incentive that application of an RDM for General Service customer classes with a 3 percent symmetrical cap would have achieved for 2010-2017.

Table 5: Percentage Elimination of Throughput Incentive for General Service Customer Classes Under RDM With Symmetrical or Asymmetrical 3% Cap

	Surcharges/(Refunds) 3% Cap	Surcharges/ (Refunds) Without Cap	Throughput Incentive Eliminated
2010	$483,852	$1,473,642	33%
2011	$484,811	$1,234,486	39%
2012	$484,566	$1,757,593	28%
2013	$513,692	$719,043	71%
2014	$327,161	$327,161	100%
2015	$529,277	$1,221,199	43%
2016	$622,022	$1,341,182	46%
2017	$541,557	$541,557	100%
2010-2017	$4,469,114	$10,066,329	44%

Table 5 indicates that an RDM for Otter Tail's General Service customer classes, with a three percent symmetrical or asymmetrical cap, would have reduced the Company's throughput incentive by 44 percent over the period. Although the 44 percent reduction is significant, the Department would be more comfortable with an RDM that eliminated more than 50 percent of the throughput incentive.

C. WHETHER THE COMMISSION SHOULD ORDER IMPLEMENTATION OF A DECOUPLING PILOT FOR OTTER TAIL

In response to DOC IR DOC-331, Otter Tail stated:

> 1. Otter Tail is not currently planning to propose a RDM. However, Otter Tail will continue to evaluate the merits and potential drawbacks of an RDM for Otter Tail and its customers. Otter Tail is reflecting on the fact that it appears that the sales forecasts set in its last two rate cases for these rate classes may have been set higher than reasonable, given what has actually occurred thereafter. Otter Tail is also concerned about the effect of caps that may be considered for such a mechanism, and the effect that such caps may have on the intended purposes of an RDM.
> 2. We do not have an alternative rate design to propose at this time. Otter Tail will continue to consider rate design

> alternatives and dialogue with stakeholders. Otter Tail notes that it continues to demonstrate effective promotion of conservation through consistent achievement of strong CIP results. Otter Tail's filed conservation results for 2017 show Otter Tail achieving 3.02 percent energy savings, over double the 1.5 percent statutory goal. The last five years of conservation efforts have also produced net financial benefits for the customers of $169,871,838 over the lifetime of the energy efficiency investments.

Given that Otter Tail does not presently support implementation of an RDM and the Company is achieving high levels of energy savings for its non-CIP-opt-out customers, the Department does not support requiring the Company to implement a decoupling pilot project. The Department notes that the Company concludes that the sales forecasts set in its last two rate cases for the Residential, Farm, and General Service rate classes may have been set higher than reasonable, given what has actually occurred thereafter. The Department clarifies that Otter Tail's sales forecasts in the past two rate cases were based on a full record and are thus, and were, considered reasonable for ratemaking purposes. The Department does, however, agree that Otter Tail's analysis resulted in unexpected results—rarely achieving the RPC authorized. The Department is willing to work with Otter Tail if the Company decides to pursue an RDM.

D. IF THE COMMISSION ORDERS IMPLEMENTATION OF AN RDM, WHAT TYPE OF DECOUPLING PILOT SHOULD BE IMPLEMENTED?

As stated above, the Department does not support Commission approval of an RDM for Otter Tail at this time. In the event that the Commission is still interested in approving an RDM for the Company, the Department recommends waiting until Otter Tail's next rate case where an RDM can be studied in conjunction with the Company's forecast. The RDM should be extended to all customer classes for non-market rate customers for which an analysis indicates Otter Tail has a throughput incentive.

E. OTHER ISSUES OR CONCERNS

The Department has no other issues or concerns at this point.

III. SUMMARY AND RECOMMENDATIONS

The Department concludes that Otter Tail's Decoupling Report included a reasonable analysis of the impact of an RDM on the Company's Residential and Farm and General Service customer classes. The analysis indicates that the RDM proposed by Fresh Energy with a three-percent symmetrical cap would have eliminated less than 50 percent of the undercollections calculated when comparing the revenue-per-customer authorized in Otter Tail's rate cases with the revenue-per-customer actually realized. While Otter Tail would have benefited from the implementation of Fresh Energy's proposed RDM, the Company indicated that it does not plan to propose RDM implementation at this time.

In response to DOC IR No. 332, Otter Tail concluded that its forecasts for its last two rate cases may have been too high. The Department concludes that Otter Tail's forecast needs to be studied more before an RDM is implemented for the Company; therefore, any RDM pilot proposal should be made at the time of OTP's next rate case to ensure that the RDM pilot can be evaluated in conjunction with the Company's forecast. Given these factors and Otter Tail's commendable high energy savings for its non-CIP-opt out customers, the Department recommends that the Commission decline to order implementation of an RDM for Otter Tail at this time.

/lt

CERTIFICATE OF SERVICE

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

MINNESOTA DEPARTMENT OF COMMERCE – COMMENTS

Docket Nos. **E017/GR-15-1033**

Dated this **25th** day of **June, 2018**.

/s/Linda Chavez

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David G.	Prazak	dprazak@otpco.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-1033_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Rate Case Inbox	Rate Case Inbox	mnratecase@otpco.com	Otter Tail	N/A	Electronic Service	No	OFF_SL_15-1033_Official Service List
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-1033_Official Service List
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-1033_Official Service List
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_15-1033_Official Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_15-1033_Official Service List
William	Taylor	bill.taylor@williamgtaylor.com	Taylor Law Firm	2921 E 57th St PO Box 10 , Sioux Falls SD	Electronic Service	No	OFF_SL_15-1033_Official Service List
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_15-1033_Official Service List
Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-1033_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_15-1033_Official Service List