

May 1, 2017

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E017/M-17-246

Dear Mr. Wolf:

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

A Request by Otter Tail Power Company (OTP) of the Company's Annual Filing of the Demand Side Management Financial Incentive Project and Annual Filing to Update the Conservation Improvement Project Rider (*Petition*).

The *Petition* was filed on March 31, 2017 by:

Jason Grenier
Manager, Market Planning
Otter Tail Power Company
P.O. Box 496
215 South Cascade Street
Fergus Falls, MN 56538-0496

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve** OTP's *Petition* with one adjustment to the billing variances requested as discussed in the attached *Comments*. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ DANIELLE WINNER
Rates Analyst

DW/ja
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET No. E017/M-17-246

I. SUMMARY OF THE UTILITY'S PROPOSAL

On March 31, 2017, Otter Tail Power Company (Otter Tail, OTP or the Company) submitted its annual Conservation Improvement Program (CIP) filing (*Petition*) for 2016 with the Minnesota Public Utilities Commission (Commission) in Docket No. E017/M-17-246. The *Petition* contains the following sections:

- a request for approval of a Demand Side Management (DSM) financial incentive of \$5,031,678;
- proposed recoveries and expenditures in the Company's CIP tracker account during 2016 resulting in a year-end 2016 balance of \$4,835,852;
- a 2017/2018 Conservation Cost Recovery Adjustment (CCRA) of \$0.00754 per kWh for bills rendered on and after October 1, 2017; and
- a request for a variance to Minnesota Rule 7820.3500 to allow Otter Tail to continue to combine the Fuel Clause Adjustment (FCA) with the Conservation Improvement Adjustment on customer bills.

The filing also contains the Company's 2016 CIP Status Report (*Status Report*). The *Status Report* is intended to fulfill the requirements of the Minnesota Department of Commerce, Division of Energy Resources' (Department) annual CIP reporting rules contained in Minnesota Rules part 7690.0550. Since the Company's *Status Report* does not require Commission approval, this portion of the *Petition* has been assigned to a separate docket.¹

¹ See Docket No. E017/CIP-13-277.03.

II. COMMISSION'S 2016 ORDER

On July 19, 2016, in Docket No. E017/M-16-278, the Commission approved Otter Tail's 2015 CCRA and 2015 DSM Financial Incentive. The Commission's Order:

1. Approved OTP's 2015 CIP tracker account, resulting in a December 31, 2015 tracker balance of \$4,333,061.
2. Approved an incentive of \$4,257,105 for OTP's 2015 CIP achievements.
3. Approved a CCRA of \$0.00275/kWh with an effective date of October 1, 2016.
4. Granted OTP a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 for one year after the issue date of that Order.
5. Required OTP to submit a compliance filing, within 10 days of the issue date of that Order, with revised tariff sheets reflecting the Commission's determinations in this matter.

The Company submitted a compliance filing on July 28, 2016 to fulfill the Commission's Order.

III. DEPARTMENT ANALYSIS

The Department provides its analysis of Otter Tail's *Petition* below in the following sections:

- in Section III.A, Otter Tail's proposed 2016 DSM financial incentive;
- in Section III.B, Otter Tail's proposed reconciliation for the 2016 CIP Tracker Account;
- in Section III.C, Otter Tail's proposed CCRA for 2017/2018;
- in Section III.D, OTP's request for a waiver from Minnesota Rules part 7820.3500 (E) and (K) ; and
- in Section III.E, Otter Tail's historical CIP achievements and incentives.

A. OTTER TAIL'S PROPOSED FINANCIAL INCENTIVE FOR 2016

1. *Background and Summary of Otter Tail's Proposed 2016 DSM Incentive*

The Shared Savings DSM financial incentive plan was approved by the Commission in Docket No. E,G999/CI-08-133 on January 27, 2010. On December 20, 2012 the Commission issued its *Order Adopting Modifications to Shared Savings Demand Side Management Financial Incentives* (Modification Order). The Shared Savings approach emphasizes a 1.5 percent energy savings goal, and ties the incentive earned by the utility to pursuit of the 1.5 percent savings goal. The incentive mechanism sets a specific dollar

amount per unit of energy saved that each utility will earn at energy savings equal to 1.5 percent of annual non-CIP-exempt retail sales. That dollar amount is referred to as the incentive calibration. The higher the calibration, the higher the incentive will be at all energy savings levels after the threshold. Specifically, each electric utility's incentive is calibrated so that when the utility achieves energy savings equal to 1.5 percent of retail sales, electric utilities will earn an incentive equal to \$0.07 per kWh saved and gas utilities will earn \$9 per thousand cubic feet (Mcf) saved. The Commission's Modification Order stated, in part:

The Commission hereby adopts the Department's proposal for the continuation of the new shared savings financial incentive with the following:

- A. A threshold set at half of the utility's average achievements from 2007 to 2011 for utilities with triennial CIPs beginning in 2013, removing both the maximum and minimum achievements, or at 0.4 percent of retail sales, whichever is lowest. For utilities with triennial Conservation Improvement Programs beginning in 2014, the threshold shall be set at half of the utility's average achievements from 2008 to 2012, removing both the maximum and minimum achievements, or at 0.4 percent of retail sales, whichever is lowest.
- B. The calibration at 1.5 percent of retail sales for each utility set as follows: (1) \$9.00 per Mcf for natural gas utilities, and (2) \$0.07 per kWh for electric utilities.
- C. A utility may not modify its incentive to correct for non-linear benefits.
- D. The incentive shall be capped at 20 percent of net benefits for all utilities except for Minnesota Power. The Commission will defer a decision on the application of the 20 percent cap of net benefits for Minnesota Power until 2013 to allow for the consideration of updated avoided cost information for this utility.
- E. The existing cap of 125 percent of a utility's 1.5 percent calibration level for the electric utilities (\$0.0875 per kWh) and a cap of 125 percent of the 1.0 percent target calibration for gas utilities (\$6.875) per Mcf are continued.
- F. The percentage of net benefits to be awarded to each utility at different energy savings levels will be set at the beginning of each year.
- G. The CIP-Exempt Class shall not be allocated costs for the new shared savings incentive. Sales to the CIP-Exempt Class shall not be included in the calculation of utility energy savings goals.

- H. If a utility elects not to include a third-party CIP project, the utility cannot change its election until the beginning of subsequent years.
- I. If a utility elects to include a third-party project, the project's net benefits and savings will be included in calculation of the percentage of net benefits awarded at specific energy savings levels (calculated before the CIP year begins) and in the post CIP year calculations of net benefits and energy savings achieved and incentive awarded. In any case, the energy savings will count toward the 1.5 percent savings goal.
- J. The energy savings, costs, and benefits of modifications to non-third-party projects will be included in the calculation of a utility's DSM incentive, but will not change the percent of net benefits awarded at different energy savings levels.
- K. The costs of any mandated, non-third-party projects (e.g., Next Generation Energy Act assessment, University of Minnesota Institute for Renewable Energy and the Environment costs) shall be excluded from the calculation of net benefits awarded at specific energy savings levels (calculated before the CIP year begins) and in the post-CIP year calculations of net benefits and energy savings achieved and incentive awarded.
- L. Costs, energy savings, and energy production from Electric Utility Infrastructure Projects (EUIC), solar installation and biomethane purchases shall not be included in energy savings for DSM financial incentive purposes.
- M. The Department shall file a recommendation with the Commission on the application of a net benefits cap for Minnesota Power's incentive by October 1, 2013. The recommendation should be filed in Docket No. E,G-999/CI-08-133.
- N. No adjustment will be made at this time to the calibration of the incentive mechanism for utilities that have Commission-approved decoupling mechanisms.
- O. The new shared savings DSM incentive shall be in operation for the length of each utility's triennial CIP plan.

Otter Tail estimated that its 2016 achievements resulted in \$49,918,210 of net benefits.² Otter Tail also stated in its *Petition* that its CIP activities achieved energy savings in 2016 of 57,504,891 kWh, which is approximately 2.75 percent of Otter Tail's 3-year average weather

² Net benefits amount excludes Next Generation Energy Act assessments and OTP's Publicly-Owned Property Solar Program.

normalized, non-CIP-exempt retail sales of 2,091,441,263 kWh.³ Based on the terms and conditions of its approved DSM incentive plan, Otter Tail requested recovery of a DSM financial incentive of \$5,031,678 for 2016, which is approximately 65 percent (\$5,031,678/\$7,770,781) of the Company's 2016 CIP actual expenditures.

2. *The Department's Review of Otter Tail's Proposed 2016 DSM Incentive*

Otter Tail calculated that its 2016 performance results in a Shared Savings DSM financial incentive of \$5,031,678.

The Department's engineering-oriented analysis of the demand and energy savings that underpin Otter Tail's proposed 2016 DSM financial incentive is ongoing. This analysis will not be completed before the instant *Comments* are due. The existence of this lag between the Company's request for recovery of the incentive and the completion of the DOC's engineering review is a recurring phenomenon.

In 2016, as in previous years, the Department compensated for this lag by simply assuming OTP's claimed energy savings for 2015 were correct as filed and planned to make in the instant filing any adjustments approved by the Deputy Commissioner of the Department. However, the Deputy Commissioner approved Otter Tail's 2016 Status Report, covering 2015 CIP activity, without any adjustments in Docket No. E017/CIP-13-277.02, and thus none need to be made this year.⁴

In the event that the Deputy Commissioner of the Department approves a different 2016 CIP energy savings or budget, the Commission can approve any adjustments to the Company's DSM financial incentive for 2016 achievements as part of the Company's 2017 filing, which will be made April 2, 2018.

B. *OTTER TAIL'S PROPOSED 2016 CIP TRACKER ACCOUNT*

In its *Petition*, Otter Tail requested approval of its report on recoveries and expenditures included in the Company's CIP tracker account balance during 2016. Activity in Otter Tail's CIP tracker account during 2016 is summarized below in Table 1.

³ Savings amount excludes Made in Minnesota Program and allocated savings from OTP's Publicly-Owned Property Solar Program.

⁴ Department Staff initially recommended reducing the Company's 2015 savings from the Made in Minnesota Program by 4,175 kWh, but the Deputy Commissioner's final Decision allowed those savings, noting that Department Staff had incorrectly assumed that savings should be counted at the generator rather than at the meter.

Table 1: A Summary of OTP's 2016 CIP Tracker Account

Description	Time Period	Amount
Beginning Balance	December 31, 2015	\$4,333,061
CIP Expenses	January 1 through December 31, 2016	\$ 7,770,781
DSM Financial Incentive	Approved in 2016 for 2015	\$4,257,105
Carrying Charges	January 1 through December 31, 2016	\$26,368
CCRC Recovery (in base rates)	January 1 through December 31, 2016	(\$4,327,443)
CCRA Recovery	January 1 through December 31, 2016	(\$7,224,020)
Ending Balance	December 31, 2016	\$4,835,852

The Department reviewed Otter Tail's CIP Tracker account and concludes that the Company correctly calculated its CIP tracker account for 2016. The Department recommends that the Commission approve Otter Tail's 2016 CIP Tracker account as summarized in Table 1.

C. OTTER TAIL'S PROPOSED UPDATED CIP RIDER AND CCRA

OTP's approved CCRA (CIP adjustment rate) is \$0.00275 per kWh, as approved by the Commission on July 19, 2016 in Docket No. E017/M-16-278. For October 2017 through September 2018, Otter Tail proposed an increase in the surcharge to \$0.00754/kWh or an increase of approximately 174 percent from the Company's current surcharge.

Otter Tail's proposal is projected to reduce the Company's projected under-recovered CIP tracker balance from \$7,932,748 on October 1, 2017 to (\$4,845) by September 30, 2018. OTP estimated that this rate increase will increase an average residential customer's bill by \$3.85/month. The Company estimated that the carrying costs associated with this proposal for the October 1, 2017 through September 30, 2018 time period would be equal to \$29,446. Table 2 below delineates the Company's estimate.

Table 2: OTP's Forecasted 2017-2018 CIP Tracker Account

Line No.	Description	Time Period	Amount
1.	Beginning Balance	October 1, 2017	\$7,932,748
2.	CIP Program Expenses	October 1, 2017 - September 30, 2018	\$7,537,653
3.	CIP Incentive	Forecasted 2017 incentive that would be approved in 2018 ⁵	\$1,955,200
4.	Carrying Charges	October 1, 2017 - September 30, 2018	\$29,446
5.	CIP Expenses Subtotal (Line 1 + Line 2 + Line 3 + Line 4)	As of September 30, 2017	\$17,455,047
6.	Conservation Cost Recovery Charge -Included in Base Rates	October 1, 2017 - September 30, 2018	(\$3,985,216)
7.	CCRA	October 1, 2017 - September 30, 2018	(\$13,474,676)
8.	CIP Revenues Subtotal (Line 6 + Line 7)	As of September 30, 2018	(\$17,459,892)
9.	Ending Balance (Line 8 - Line 5)	As of September 30, 2018	(\$4,845)

The Company noted that the significant increase from the current CCRA to the proposed CCRA is due largely to the fact that two of the Company's large customers, Enbridge Energy, LP and Denco II, LLC, recently became CIP-exempt. Their exemptions became effective for retail revenues attributable to their facilities beginning January 1, 2017. Therefore, the CIP revenues received for the January 2017 – October 2017 period are expected to be much lower than what were originally projected by the Company in last year's CCRA filing. As a result, the projected September 30, 2017 tracker balance is much higher, and therefore Otter Tail requires a larger CCRA to bring the tracker balance back to close to zero. The Company projected that this higher rate will be temporary, and, assuming the proposed CCRA of \$0.00754/kWh is implemented, expects to propose a lower CCRA of \$0.00307/kWh in next year's filing.⁶

The Department has verified with the Company that CIP-exemption requests of this magnitude and impact are unlikely to happen again; this is because customers who could potentially qualify for CIP exemptions in the future comprise a much smaller percentage of the Company's retail sales. Additionally, the Company is unaware of any customers planning to apply for CIP-exempt status at this time. Therefore, the Department notes that this type of large increase in the CCRA due to CIP exemptions is unlikely to be commonplace, and so can reasonably be considered a one-time occurrence.

⁵ This forecasted incentive for 2017 CIP achievements represents the first year in which the revised financial incentive mechanism will be in place, as approved in the Commission's August 5, 2016 Order in Docket No. E.G999/CI-08-133. This financial incentive for 2017 CIP achievements should not be confused with OTP's proposed incentive of \$5,031,678 for 2016 CIP achievements that Otter Tail proposed in its *Petition*.

⁶ This estimate was provided to the Department in an email from the Company.

The Department notes that, in terms of recovery through the proposed CCRA, the high projected tracker balance is somewhat offset by the Company's projected 2018 Financial Incentive for CIP activities in 2017. In Docket No. E,G999/CI-08-133, the Commission approved a new Financial Incentive mechanism to become effective for 2017 CIP activities. Using the new methodology, the Company projected its financial incentive to be around \$2 million, or less than half of the currently proposed incentive for CIP activities in 2016. Based on the Company assumptions of the energy savings, expenditures, and net benefits resulting from OTP's 2017 CIP achievements, Otter Tail's projected 2017 Shared Savings incentive award appears reasonable.

However, the Department also notes that the Company's estimated carrying charges for the October 1, 2017-September 30, 2018 period are too low. This is because, per the Commission's Order on last year's CIP Tracker Filing, the Company has continued to set carrying charges equal to the 0.79 percent short term cost of debt approved in the Company's 2010 rate case, Docket No. E017/GR-10-239. However, the Commission will now likely approve a new short term cost of debt rate of 2.55% in the Company's 2016 Rate Case, Docket No. E017/GR-15-1033. Therefore, it is appropriate for Otter Tail to set the carrying charge rate at the Company's new short term cost of debt, beginning in the month that the Commission's final Order on the current rate case is issued.⁷ This change will have the effect of increasing the projected unrecovered tracker balance, and thus, will likely result in an even greater increase in the CCRA. Therefore, the Department concludes that the proposed CCRA may be slightly too low.

Therefore, the Department recommends that the Company update the carrying charge rate applied in its tracker to the new short term cost of debt rate in the month the Commission issues the rate case Order, and submit a filing in the instant docket with the updated carrying charge, projected tracker balance, and CCRA.

D. OTP'S ANNUAL REQUEST FOR VARIANCES FROM COMMISSION RULES

Otter Tail requested two rule variances:

- a variance from Minnesota Rules part 7820.3500 (E), which requires bill itemization of all charges incurred at each level of customer usage ; and
- a variance from Minnesota Rules part 7820.3500 (K), which requires the fuel clause adjustment to be listed on customers' bills as a separate line item.

⁷ The Department notes that the currently approved short term cost of debt of 0.79 percent should be applied to all of the months before the Commission's Final Order in the 2015 Rate Case is issued. This practice was affirmed in Docket No. G008/M-16-366, in which the Commission ordered CenterPoint Energy to use its approved short term cost of debt throughout the interim rate period, and only implement the newly approved short term cost of debt rate beginning with the effective date of final rates.

OTP requested a variance of these two rules so that the Company may combine the FCA and CIP adjustment rate on one bill line-item called a “Resource Adjustment.”

OTP stated that “as in prior years, Otter Tail is requesting a variance to Minnesota Rule 7820.3500 (E & K), which require that the Fuel Clause Adjustment (“FCA”) be stated as a separate line item on customer bills. The requested variance would allow the Company to continue to combine the FCA with the CCRA on customer bills.”⁸

The Department notes that in prior Orders for Otter Tail’s CCRA and DSM Financial Incentive filings,⁹ OTP has requested and the Commission has granted variances to Minnesota Rules 7820.3500 (K) and 7825.2600, but not Minnesota Rules 7820.3500 (E), which requires “a complete itemization of all charges incurred at each level of customer usage.” Given that the prior Orders have been sufficient to combine the FCA and CIP adjustment as a “Resource Adjustment” on the billing form, the Department recommends that the Commission instead approve the following variances:

- a variance from Minnesota Rules part 7820.3500 (K), which requires the fuel clause adjustment to be listed on customers’ bills as a separate line item; and
- a variance from Minnesota Rules part 7825.2600, which states that the FCA should be stated on a per-kWh basis on customer bills.

Minnesota Rules part 7829.3200 authorizes the Commission to grant a variance to its rules when:

- enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- granting the variance would not adversely affect the public interest; and
- granting the variance would not conflict with standards imposed by law.

With respect to the first rule requirement, Otter Tail stated that the Company has been combining its FCA and CIP Rider as a Resource Adjustment line item on customers’ bills since July 1995, and that customers have become familiar with the single-line item on their bills. With respect to the second rule requirement, Otter Tail stated that continuation of the variances would not adversely affect the public interest and may avoid customer confusion if the presentation of customers’ bills were altered at this time. With respect to the third rule requirement, Otter Tail stated that there are no statutory provisions that would prohibit the Commission from granting the variance.

⁸ *Petition* pg. 4.

⁹ E017/M-14-201, E017/M-15-279, E017/M-16-278.

Based on its review of the Company's rationale for the proposed variances, the Department concludes that Otter Tail has met the conditions set forth in Minnesota Rules part 7829.3200 for the Commission to grant the requested variances. Thus, the Department recommends that the Commission grant Otter Tail's proposed variances to Minnesota Rules part 7820.3500 (K) and Minnesota Rules part 7825.2600 for one year after issue date of the Commission's *Order* in the present docket.

E. HISTORY OF OTTER TAIL'S CIP ACHIEVEMENTS AND FINANCIAL INCENTIVES

The Department has included a summary of historical and forecasted CIP-related information for Otter Tail in Attachment A. The information in Attachment A provides summary information for the period from 2007 through 2016. In addition, the Department developed Table 3 below, reproduced from OTP's Petition that summarizes the Company's DSM financial incentives, CIP expenditures, reported energy savings, and first year average cost per kWh saved between 2012 and 2016.

As indicated in Table 3, Otter Tail's 2016 energy savings have risen significantly since 2015. Otter Tail's 2016 average cost per kWh saved has risen slightly since 2015, but is lower than the Company's average cost per kWh in 2012.

Table 3: Selected Summary Statistics for OTP's CIP Program (2012-2016)

Description	2012	2013	2014	2015	2016
DSM Financial Incentive	\$2,681,575	\$4,026,600	\$2,957,972	\$4,257,105	\$5,031,678
CIP Expenditures	\$4,816,994	\$5,259,625	\$5,188,931	\$6,105,445	\$7,770,781
Achieved Energy Savings (kWh)	30,793,654	35,792,002	33,805,392	48,652,628	57,504,891
Average Cost per kWh Saved	\$0.16	\$0.15	\$0.15	\$0.13	\$0.14

The information included in Attachment A and Table 3 demonstrate that Otter Tail's CIP efforts have been very successful to date.

IV. THE DEPARTMENT'S RECOMMENDATIONS

The Department recommends that the Company update its carrying charge rate applied in its CIP tracker to the new approved short term cost of debt rate beginning the month of the Commission's final Order in Docket No. E017/GR-15-1033, and submit a compliance filing in the instant docket with the updated carrying charge, projected tracker balance, and CCRA

within 20 days of the Commission's rate case Order. The Department will provide comments at that time should the change in the short term cost of debt rate appear to warrant a revised CCRA.

At this time, and based on the analysis provided above, the Department recommends that the Commission:

1. approve Otter Tail's 2016 CIP tracker account, as summarized in Table 1 above, resulting in a December 31, 2016 tracker balance of \$4,835,852;
2. approve an incentive of \$5,031,678 for Otter Tail's 2016 CIP achievements;
3. approve a CCRA of \$0.00754 per kWh, to be effective October 1, 2017;
4. grant Otter Tail a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 for one year after the issue date of the Commission's *Order* in the present docket; and
5. require Otter Tail to submit a compliance filing, within 10 days of the issue date of the *Order* in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

/ja

Otter Tail Power's Historical CIP Achievements, Incentives, and Tracker Balance

2007-2016

Line No.		2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
1.	Achieved Energy Savings (kWh)	11,468,831	15,994,719	35,706,319	31,792,750	27,957,635	30,793,654	35,792,002	33,805,392	48,652,628	57,504,891
2.	CIP Expenditures	\$1,862,697	\$2,345,874	\$4,093,050	\$5,030,119	\$4,344,581	\$4,816,994	\$5,253,935	\$5,188,931	\$6,105,445	\$7,770,781
3.	Net Benefits	\$6,860,618	\$9,891,448	\$35,624,398	\$28,444,292	\$19,307,820	\$21,167,988	\$32,764,856	\$26,035,459	\$38,079,065	\$49,691,112
4.	DSM Financial Incentive	\$25,066	\$273,798	\$1,101,060	\$3,531,538	\$2,608,098	\$2,681,575	\$4,026,600	\$2,957,972	\$4,257,105	\$5,031,678
5.	Carrying Charges	\$53,025	-\$4,830	\$26,437	\$146,441	\$221,862	\$222,097	\$237,859	\$219,788	\$31,473	\$26,368
6.	Year-End Tracker Balance	\$490,713	\$265,056	\$1,927,314	\$3,721,665	\$5,188,129	\$3,572,621	\$4,835,558	\$5,731,183	\$4,333,061	\$4,835,852
7.	Average Cost per first year kWh Saved	\$0.162	\$0.147	\$0.115	\$0.158	\$0.155	\$0.156	\$0.147	\$0.153	\$0.125	\$0.135
8.	Average cost per kWh Saved (including incentives)	\$0.165	\$0.164	\$0.145	\$0.269	\$0.249	\$0.244	\$0.259	\$0.241	\$0.213	\$0.223
9.	Incentive as a % of CIP Expenditures	1%	12%	27%	70%	60%	56%	77%	57%	70%	65%
10.	Incentive as a % of Net Benefits	0%	3%	3%	12%	14%	13%	12%	11%	11%	10%
11.	Incentive per first year kWh saved	\$0.002	\$0.017	\$0.031	\$0.111	\$0.093	\$0.087	\$0.112	\$0.088	\$0.088	\$0.088
12.	Carrying Charges as a % of Expenditures	3%	0%	1%	3%	5%	5%	5%	4%	1%	0.3%
13.	Year-End Tracker Balance as a % of Expenditures	26%	11%	47%	74%	119%	74%	92%	111%	71%	62%

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, 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 No. E017/M-17-246

Dated this 1st day of May 2017

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_17-246_M-17-246
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_17-246_M-17-246
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_17-246_M-17-246
John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance	1313 5th St SE Ste 303 Minneapolis, MN 55414	Electronic Service	No	OFF_SL_17-246_M-17-246
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_17-246_M-17-246
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_17-246_M-17-246
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	OFF_SL_17-246_M-17-246
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-246_M-17-246
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_17-246_M-17-246
Charlie	Buck	charlie.buck@oracle.com	Oracle	760 Market St FL 4 San Francisco, CA 94102	Electronic Service	No	OFF_SL_17-246_M-17-246

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_17-246_M-17-246
Gary	Connett	gconnett@grenergy.com	Great River Energy	12300 Elm Creek Blvd N Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_17-246_M-17-246
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_17-246_M-17-246
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_17-246_M-17-246
Jill	Curran	jcurran@mnchamber.com	Minnesota Waste Wise	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_17-246_M-17-246
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_17-246_M-17-246
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-246_M-17-246
Ian	Dobson	Residential.Utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_17-246_M-17-246
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_17-246_M-17-246

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	OFF_SL_17-246_M-17-246
Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	OFF_SL_17-246_M-17-246
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_17-246_M-17-246
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	OFF_SL_17-246_M-17-246
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-246_M-17-246
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_17-246_M-17-246
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_17-246_M-17-246
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_17-246_M-17-246
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_17-246_M-17-246
Angela E.	Gordon	angela.e.gordon@lmco.com	Lockheed Martin	1000 Clark Ave. St. Louis, MO 63102	Electronic Service	No	OFF_SL_17-246_M-17-246

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	OFF_SL_17-246_M-17-246
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_17-246_M-17-246
Stephan	Gunn	sgunn@appliedenergygroup.com	Applied Energy Group	1941 Pike Ln De Pere, WI 54115	Electronic Service	No	OFF_SL_17-246_M-17-246
Jeffrey	Haase	jhaase@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_17-246_M-17-246
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_17-246_M-17-246
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_17-246_M-17-246
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	OFF_SL_17-246_M-17-246
Norm	Harold	N/A	NKS Consulting	5591 E 180th St Prior Lake, MN 55372	Paper Service	No	OFF_SL_17-246_M-17-246
Jared	Hendricks	hendricksj@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_17-246_M-17-246
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_17-246_M-17-246

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-246_M-17-246
Karolanne	Hoffman	kmh@dairynet.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_17-246_M-17-246
Randy	Hoffman	rhoffman@eastriver.coop	East River Electric Power Coop	121 SE 1st St PO Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_17-246_M-17-246
Jim	Horan	Jim@MREA.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_17-246_M-17-246
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	OFF_SL_17-246_M-17-246
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_17-246_M-17-246
Joel W.	Kanvik	joel.kanvik@enbridge.com	Enbridge Energy LLC	4628 Mike Colalillo Dr Duluth, MN 55807	Electronic Service	No	OFF_SL_17-246_M-17-246
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_17-246_M-17-246
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_17-246_M-17-246
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE Austin, MN 55912	Electronic Service	No	OFF_SL_17-246_M-17-246

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Erica	Larson	erica.larson@centerpointenergy.com	CenterPoint Energy	505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038	Electronic Service	No	OFF_SL_17-246_M-17-246
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-246_M-17-246
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_17-246_M-17-246
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	OFF_SL_17-246_M-17-246
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_17-246_M-17-246
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-246_M-17-246
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_17-246_M-17-246
Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	OFF_SL_17-246_M-17-246
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	OFF_SL_17-246_M-17-246
John	McWilliams	jmm@dairy.net	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_17-246_M-17-246

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-246_M-17-246
Craig	Metz	N/A	EnSave Energy Performance	65 Millet St, Suite 105 Richmond, VT 05477	Paper Service	No	OFF_SL_17-246_M-17-246
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_17-246_M-17-246
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_17-246_M-17-246
Gary	Myers	garym@hpuc.com	Hibbing Public Utilities	PO Box 249 Hibbing, MN 55746	Electronic Service	No	OFF_SL_17-246_M-17-246
Susan K	Nathan	snathan@appliedenergygroup.com	Applied Energy Group	2215 NE 107th Ter Kansas City, MO 64155-8513	Electronic Service	No	OFF_SL_17-246_M-17-246
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_17-246_M-17-246
Jed	Norgaarden	J.Norgaarden@src-mn.org	Sustainable Resources Center	1081 10th Ave SE Minneapolis, MN 55414	Electronic Service	No	OFF_SL_17-246_M-17-246
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_17-246_M-17-246
Paul	Ohlson	N/A	EnSave Energy Performance	65 Millet Street, Suite 105 Richmond, VT 05477	Paper Service	No	OFF_SL_17-246_M-17-246

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Matt	Okeefe	Matt.okeefe@oracle.com	Oracle	760 Market St FL 4 San Francisco, CA 94102	Electronic Service	No	OFF_SL_17-246_M-17-246
Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_17-246_M-17-246
Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	OFF_SL_17-246_M-17-246
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	OFF_SL_17-246_M-17-246
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_17-246_M-17-246
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_17-246_M-17-246
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-246_M-17-246
Bruce	Sayler	bruces@connexusenergy.com	Connexus Energy	14601 Ramsey Boulevard Ransey, MN 55303	Electronic Service	No	OFF_SL_17-246_M-17-246
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-246_M-17-246

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_17-246_M-17-246
Cindy	Schweitzer Rott	cindy.schweitzer@clearesult.com	CLEAResult's	S12637A Merrilee Rd. Spring Green, WI 53588	Electronic Service	No	OFF_SL_17-246_M-17-246
Anna	Sherman	anna.sherman@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55459	Electronic Service	No	OFF_SL_17-246_M-17-246
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_17-246_M-17-246
Anna	Sommer	anna@sommerenergy.com	Sommer Energy LLC	PO Box 766 Grand Canyon, AZ 86023	Electronic Service	No	OFF_SL_17-246_M-17-246
Grey	Staples	gstaples@mendotagroup.com	The Mendota Group LLC	1830 Fargo Lane Mendota Heights, MN 55118	Electronic Service	No	OFF_SL_17-246_M-17-246
Leo	Steidel	lsteidel@energyplatforms.com	Energy Platforms	8170 Old Carriage Court N Ste 200 Shakopee, MN 55379	Paper Service	No	OFF_SL_17-246_M-17-246
Richard	Szydlowski	rszydlowski@mncee.org	Center for Energy & Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401-1459	Electronic Service	No	OFF_SL_17-246_M-17-246
Steve	Tomac	stomac@becp.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	OFF_SL_17-246_M-17-246
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_17-246_M-17-246

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_17-246_M-17-246
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	OFF_SL_17-246_M-17-246
Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_17-246_M-17-246
Cam	Winton	cwinton@mnychamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_17-246_M-17-246
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_17-246_M-17-246
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_17-246_M-17-246

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Mathias	Bell	mathias.bell@opower.com	Opower	1515 N Courthouse Rd Arlington, VA 22201	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Gary	Connett	gconnett@grenergy.com	Great River Energy	12300 Elm Creek Blvd N Maple Grove, MN 553694718	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jill	Curran	jcurran@mncchamber.com	Minnesota Waste Wise	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206 St. Paul, Minnesota 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Chris	Duffrin	chrisd@thenec.org	Neighborhood Energy Connection	624 Selby Avenue St. Paul, MN 55104	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

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Angela E.	Gordon	angela.e.gordon@lmco.com	Lockheed Martin	1000 Clark Ave. St. Louis, MO 63102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Stephan	Gunn	sgunn@appliedenergygroup.com	Applied Energy Group	1941 Pike Ln De Pere, WI 54115	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700 Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Norm	Harold	N/A	NKS Consulting	5591 E 180th St Prior Lake, MN 55372	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Jared	Hendricks	hendricksj@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Karolanne	Hoffman	kmh@dairynet.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Randy	Hoffman	rhoffman@eastriver.coop	East River Electric Power Coop	121 SE 1st St PO Box 227 Madison, SD 57042	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

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Tom	Holt	tholt@eastriver.coop	East River Electric Power Coop., Inc.	PO Box 227 Madison, SD 57042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jim	Horan	Jim@MREA.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Joel W.	Kanvik	joel.kanvik@enbridge.com	Enbridge Energy LLC	4628 Mike Colalillo Dr Duluth, MN 55807	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE Austin, MN 55912	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Scott	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
John	McWilliams	jmm@dairy.net	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Gary	Myers	garym@hpuc.com	Hibbing Public Utilities	PO Box 249 Hibbing, MN 55746	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Susan K	Nathan	snathan@appliedenergygroup.com	Applied Energy Group	2215 NE 107th Ter Kansas City, MO 64155-8513	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Gary	Oetken	goetken@agp.com	Ag Processing, Inc.	12700 West Dodge Road P.O. Box 2047 Omaha, NE 681032047	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Bill	Poppert	info@technologycos.com	Technology North	2433 Highwood Ave St. Paul, MN 55119	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Cindy	Schweitzer Rott	cindy.schweitzer@clearesult.com	CLEARResult's	S12637A Merrilee Rd. Spring Green, WI 53588	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Anna	Sherman	anna.sherman@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55459	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Leo	Steidel	N/A	The Weidt Group	5800 Baker Rd Minnetonka, MN 55345	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Richard	Szydlowski	rszydlowski@mncee.org	Center for Energy & Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401-1459	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
SaGonna	Thompson	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Steve	Tomac	stomac@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL__CIP SPECIAL 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	No	SPL_SL__CIP SPECIAL SERVICE LIST