

July 14, 2014

Burl W. Haar
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. E002/M-14-287

Dear Dr. Haar:

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

Petition of Northern States Power Company d/b/a Xcel Energy for Approval of its 2013 Electric Conservation Improvement Program (CIP) Adjustment, Financial Incentive on 2013 Performance, and 2014/2015 Electric CIP Adjustment Factor.

The petition was filed on April 1, 2014 and an errata was submitted on May 21, 2014. The petitioner is:

Shawn White
Manager, DSM Regulatory Strategy and Planning
Northern States Power Company d/b/a Xcel Energy
414 Nicollet Mall
Minneapolis, MN 55401

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve Xcel's petition**, and is available to answer any questions the Commission may have.

Sincerely,

/s/ CHRISTOPHER T. DAVIS
Rates Analyst

CTD/lt
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE MINNESOTA DEPARTMENT OF COMMERCE DIVISION OF ENERGY RESOURCES

DOCKET NO. E002/M-14-287

I. INTRODUCTION

On April 1, 2014, Northern States Power Company d/b/a Xcel Energy (Xcel or the Company) submitted to the Minnesota Public Utilities Commission (Commission) the Company's *Petition for Approval of its 2013 Electric CIP [Conservation Improvement Program] Tracker Account, Financial Incentive on 2013 Performance, and 2014/2015 Electric Conservation Improvement Program Adjustment Factor* the (Petition). The Petition includes a report of proposed recoveries and expenditures in Xcel's electric CIP tracker account during 2013, a proposed reduction in the currently approved electric CIP Adjustment Factor (CAF), and a proposed incentive for its 2013 CIP achievements.

The Petition contains data relevant to the Company's natural gas utility. The Division of Energy Resources of the Minnesota Department of Commerce (Department) will not comment here on information related to the natural gas utility in this docket; instead see Docket No. G002/M-14-288.

II. DEPARTMENT ANALYSIS

The Department's analysis of Xcel's Petition is provided below in the following sections:

- in Section II.A, Xcel's proposed electric 2013 CIP Tracker Account;
- in Section II.B, Xcel's proposed electric CCRA for 2014-2015;
- in Section II.C, Xcel's proposed electric 2013 Demand Side Management (DSM) financial incentive; and
- in Section II.D, a review of Xcel's electric CIP activity for the period 2008 through 2013.

A. 2013 CONSERVATION COST RECOVERY

Xcel requested Commission approval of its 2013 Electric CIP Tracker activity, resulting in a year-end 2013 balance of \$30,624,948. Table 1 below shows a summary of activity in Xcel Electric's 2011 CIP tracker account.

Table 1: A Summary of Xcel Electric's 2013 CIP Tracker Account

Description	Time Period	Amount
Beginning Balance	31-Dec-12	\$31,925,410
CIP Expenses	January 1 through December 31, 2013	\$79,570,696
Financial Incentive	For 2012 CIP achievements	\$54,085,980
Carrying Charges ¹	January 1 through December 31, 2013	\$298,021
Recovered in Base Rates	January 1 through December 31, 2013	(\$78,318,284)
Recovered in CIP Adjustment Factor	January 1 through December 31, 2013	(\$56,936,876)
Ending Balance	31-Dec-13	\$30,624,948

The Department reviewed Xcel's 2013 CIP tracker account and concludes that it was correctly calculated. The Department recommends that the Commission approve the Xcel Electric 2013 CIP tracker account activity summarized in Table 1.

B. CIP ADJUSTMENT FACTOR REPORT

In its November 25, 2013 Order in Docket No. E002/M-13-247, the Commission approved a 2013/2014 CIP adjustment factor (CAF) of \$0.002935 per kWh for Xcel. Xcel currently projects an unrecovered October 1, 2015 CIP Tracker balance of \$36.4 million without any additional recovery of CIP costs through the CAF as shown in Table 2 below.

Table 2: Xcel Electric's Forecasted End of September 2015 CIP Tracker Account

Description	Amount
Forecasted beginning balance (October 2014)	\$3,782,105
October 2013-September 2014 Budget	\$88,955,403
Forecasted 2013 Incentive	\$30,684,930
Less Forecasted CCRC recovery (Oct 2014-Sept 2015)	(\$86,989,939)
Forecasted September 2015 balance without CAF	\$36,432,499

¹ Xcel's monthly carrying charges are calculated using $[(1 + \text{pre-tax weighted cost of capital})^{(1/12)}] - 1$.

Xcel includes the above calculations so that it can then determine what increase or reduction in needs through its CAF to minimize its under- or over-recovery and thus attempt to minimize its carrying charges.

The Company seeks approval to update its electric CIP Adjustment Factor to \$0.001253 per non-opt-out customer kWh with the first billing cycle of October 2014 and to remain in effect through the September 2015 billing period. Xcel’s proposed CIP Adjustment Factor is a reduction of \$0.001682 per kWh from its currently approved \$0.002935 per kWh.² Xcel’s proposed electric CAF would result in a 57 percent decrease in the Company’s current CAF. The proposed factor would allow Xcel to recover CIP costs, financial incentives, and the projected unrecovered tracker balance. In the past, the Company has included a message on customer bills referencing its changed CIP adjustment rate after the change has been approved; Xcel proposes to do so again in this proceeding.

Table 3 below shows Xcel’s calculation of its proposed CAF.

Table 3: Xcel’s Calculation of Its Revised Electric CIP Adjustment Factor

(1) Forecasted October 1, 2015 Electric CIP Tracker Balance ³	\$36,432,499
(2) Forecasted Electric Sales (MWh) – October 2014 through September 2015	28,511,943
(3) Recalculated Electric CIP Adjustment Rate = (1)/(2)	\$1.278/MWh
	\$0.001278/kWh

Xcel then decreased the adjustment factor to \$0.001253/kWh to account for returning carrying charges on projected over recovery.

With the new proposed CIP Adjustment Factor of \$0.001253 per kWh, Xcel forecasts that it will have a CIP tracker balance of close to \$0 by the end of September 2015. See Xcel’s Attachment A, Page 13 of 27 for more details. Consequently, the Department concludes that Xcel’s proposed CIP cost recovery is responsive to the public policy goal of Xcel minimizing its carrying charges.

The Department recommends that the Commission approve Xcel’s 2014/2015 CCRA of \$0.001253 per kWh.

C. XCEL’S PROPOSED ELECTRIC DSM FINANCIAL INCENTIVE FOR 2013 ACHIEVEMENTS

1. Background and Summary of Xcel’s Proposed Electric 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*

² The Company will continue to apply the current CIP Adjustment of \$0.002935 per kWh up to the first cycle of the first full billing period following Commission approval of a revised factor.

³ Assuming no CIP Adjustment Factor to collect additional CIP revenues.

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:

2. *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.

Further, the Commission approved a net benefits cap of 30 percent for Minnesota Power on November 19, 2013.

The incentive for Xcel is triggered when the Company achieves 50 percent of the utility's average energy savings for the period from 2007 to 2011, removing both the maximum and minimum achievements, or at 0.4 percent of retail sales, whichever is lowest. The incentive is capped at 8.75 cents per first-year kWh.⁴

In Attachment A of its *Petition*, Xcel reported energy savings of 494,686,290 kWh in 2013, or 1.71 percent of the Company's weather-normalized retail sales of 28,987,234,200 kWh. Xcel's 2013 energy savings were seven percent lower than its 2012 energy savings. Compared to 2007, Xcel's 2013 energy savings increased by 91 percent. Xcel reported that the net benefits associated with its 2013 achievements were \$249,969,276.⁵ Xcel calculated that the Company should receive an incentive based on 17.0739 percent of its \$249,969,276 in net benefits, or \$42,679,496.

⁴ Since Xcel's CIP projects have average lifetimes of 13 to 15 years, the cap per lifetime kWh saved is significantly lower than 8.75 cents per kWh.

⁵ See Xcel Attachment A, page 21 of 27.

3. *Department Analysis of Xcel's Proposed 2013 Electric DSM Financial Incentive*

The Department's engineering analysis of the demand and energy savings that underpin Xcel's proposed 2013 DSM financial incentive of \$42,679,496 is ongoing. In all likelihood, it will not be completed before the fall of 2014. 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 2013, the Department compensated for this lag by simply assuming Xcel's claimed energy savings for 2012 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 Xcel's 2013 Status Report, covering 2012 CIP activity, without any adjustments, in Docket No. E,G002/CIP-12-447.06 and thus none need to be made for 2012 activity in this filing.

In the event that the Deputy Commissioner of the Department approves different 2013 CIP energy savings or budget, the Commission can approve any adjustments to the Company's DSM financial incentive for 2013 achievements as part of the Company's 2015 filing.

Xcel's 2013 calculated incentive results in an incentive of 8.65 cents per first year kWh (\$42,679,496/493,769,870 kWh), which is below the 8.75 cents per kWh incentive cap. The Department's review indicates that the Company correctly calculated its DSM financial incentive; therefore the Department recommends that the Commission approve Xcel's 2013 Shared Savings financial incentive of \$42,679,496.

*D. XCEL'S PROPOSED SOLAR*REWARDS FINANCIAL INCENTIVE CALCULATION*

Xcel's Solar*Rewards program provides incentives to Xcel customers that install customer-sited solar energy generating units. Minnesota Statutes section 216B.241, subdivision 5a, permits a utility to "include in its conservation plan programs for the installation of qualifying solar energy projects . . ." The statute goes on to allow that energy savings from qualifying solar energy projects in approved conservation improvement plans may "be eligible for a performance incentive under section 216B.16, subdivision 6c, or 216B.241, subdivision 2c, that is distinct from the incentive for energy conservation and is based on the competitiveness and cost effectiveness of solar projects in relation to other potential solar projects available to the utility." A solar energy project qualifies if it meets certain quality and performance standards, if it has a peak generating capacity of 100 kilowatts or less, and if it is used to generate electricity for use in a residential, commercial, or publicly owned property or facility. Minn. Stat. § 216B.2411, subd. 2.

In Docket No. E002/M-11-1101, Xcel petitioned the Commission to approve a performance incentive under section 216B.241 for its Solar*Rewards program. Solar energy systems installed as part of the program meet the statutory requirements for "qualifying" solar energy projects. Xcel seeks the performance incentive because, although the Solar*Rewards program effectuates a statutory goal of increasing adoption of solar and distributed energy sources, the program also reduces sales of energy and therefore reduces Xcel's revenues.

On March 12, 2012, the Commission approved a financial incentive of \$0.035 for every kWh of solar energy produced during the first year of operation. The Commission's March 12, 2012 Order clarifies that the solar incentive plan applies to solar energy generated after the date of the Order (March 12, 2012).

In Xcel's filing in the instant docket, the Company estimated the first-year generation from systems that received rebates in 2013. Xcel estimated that the solar systems for which it provided rebates in 2013 had first-year generation of 1,440,978 kWh. Xcel proposed a financial incentive of \$50,434 (1,440,978 kWh x \$0.035 per kWh = \$50,434). The Department reviewed Xcel's calculations and concludes that the Company correctly calculated its 2013 incentive for its Solar*Rewards program. The Department recommends that the Commission approve an incentive of \$50,434 for Xcel's 2013 Solar*Rewards achievements.

E. A REVIEW OF XCEL'S ELECTRIC CIP ACTIVITY (2008-2013)

In Table 4 below the Department presents a historical comparison of Xcel's electric CIP activity for the period 2006 through 2012. Table 4 provides an indication of how the Company's DSM financial incentive, carrying charges, year-end tracker balance, CIP expenditures, and reported energy savings changed during the period.

Table 4: History of Xcel's Electric CIP Activity (2008-2013)

	<u>2008</u>	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>
DSM Financial Incentive	\$14,761,751	\$16,398,115	\$40,401,006	\$51,350,104	\$53,911,925	\$42,679,496
Incentive as a % of CIP Expenditures	29.22%	28.33%	56.20%	67.30%	61.92%	53.64%
Carrying Charges	\$125,176	\$613,210	\$1,132,778	(\$618,259)	\$4,231	\$298,021
Carrying Charges as a % of Expenditures	0.25%	1.06%	1.58%	-0.81%	0.00%	0.37%
Year-End Tracker Balance	\$7,794,342	\$24,785,198	\$24,233,452	(\$21,768,428)	\$31,925,410	\$30,624,948
Year-End Tracker Balance as a % of CIP Expenditures	15.43%	42.82%	33.71%	-28.53%	36.67%	38.49%
CIP Expenditures	\$50,516,190	\$57,885,077	\$71,884,335	\$76,302,262	\$87,071,903	\$79,570,696
Achieved Energy Savings (kWh)	331,024,729	342,205,073	409,111,894	462,021,574	533,477,510	462,021,576
Average Cost Per kWh Saved ⁶	\$0.15	\$0.17	\$0.18	\$0.17	\$0.16	\$0.17

An analysis of Table 4 indicates that, between 2008 and 2013, the Company's energy savings grew 49 percent, the Company's expenditures grew 48 percent, and the Company's incentives grew 190 percent. Xcel's tracker balance was \$30.6 million at the end of 2013. Xcel projects that by the end of September 2015 its tracker balance will be close to zero again. Xcel's carrying charges for 2013 climbed close to \$300,000. In the past few years the Department has been working with utilities and the Commission to minimize carrying charges. As can be seen in Table 4 above, Xcel's carrying charges peaked at \$1.1 million in

⁶ Xcel's conservation measures have an average lifetime of 13 to 15 years. Consequently, the average lifetime cost of energy saved is much lower.

2010 and have varied since then, with a negative carrying charge in 2011. As a percent of total CIP expenses, Xcel electric's carrying charges are relatively insignificant, but can still pose a cost to customers.

The Department notes that carrying charges were first approved as part of Minnesota utilities' CIP tracker accounting in the early 1990s. One of the purposes of carrying charges, and allowing recovery through a CIP tracker account, was to provide utilities an incentive to invest in energy conservation by ensuring that they not only recovered all conservation costs incurred in a timely manner, but that they also received a carrying charge on uncollected balances. At that time financial incentives for conservation were de minimis.

Now, however, the Commission provides large financial incentives for utility investments in CIP (Xcel's electric DSM financial incentives totaled \$146.3 million for 2010-2012). Rather than continue to calculate carrying charges on positive or negative monthly tracker account balances, the Department recommends that the Commission eliminate carrying charges. The Department notes that eliminating carrying charges on CIP balances would bring the CIP tracker into line with how the Commission treats other riders for Xcel. For example, Xcel does not compute carrying charges on its Renewable Energy Standard Rider (see Docket E002/M-13-475) or its Transmission Cost Recovery Rider (see Docket No. E002/M-13-1179). The Department concludes that it is reasonable to exclude carrying charges for Xcel beginning with this filing.

In the event that the Commission decides not to discontinue Xcel's CIP carrying charges, then the Department recommends that the Commission disallow carrying charges on Xcel's financial incentive. The Minnesota Chamber of Commerce (the Chamber) made this recommendation for Otter Tail Power Company in the Chamber's May 30, 2014 Comments (see Docket No. E017/M-14-201). The Chamber argued that carrying costs should not be charged "since the utility is not incurring any risk in receiving the incentive nor are dollars being held up to pay for the CIP expenditures." The Department agrees with the Chamber that paying carrying costs on CIP financial incentives is not needed and recommends that Xcel remove its incentive when calculating carrying charges. The Department anticipates that removing Xcel's DSM financial incentive may reduce carrying charges to such an extent as to virtually eliminate carrying charges.

In summary, the Department recommends that the Commission approve Xcel's proposed CAF of \$0.001253 per kWh. The Department also recommends that the Commission eliminate carrying charges on under- or over-recovered CIP balances beginning with the month after the Commission issues its Order in this docket. In the event that the Commission decides not to eliminate carrying charges on the entire CIP balance, the Department recommends that the Commission not allow carrying charges on Xcel's CIP financial incentive.

F. 2013 LEGISLATIVE CHANGES TO HOW LOW-INCOME NET BENEFITS MAY BE COUNTED TOWARDS DSM SHARED SAVINGS INCENTIVE

Minnesota Statutes Section 216B.241, subdivision 7 was amended by the 2013 Minnesota Legislature to state:

(e) The costs and benefits associated with any approved low income gas or electric conservation improvement program that is not cost-effective when considering the costs and benefits to the utility may, at the discretion of the utility, be excluded from the calculation of net economic benefits for purposes of calculating the financial incentive to the utility. The energy and demand savings may, at the discretion of the utility, be applied toward the calculation of overall portfolio energy and demand savings for the purposes of determining progress toward annual goals and in the financial incentive mechanism.

In Attachment A, page 20 of 27 of its filing, Xcel stated that the Company included the net benefits from its low-income segment in both its pre-year inputs and 2013 achievement.

III. DEPARTMENT RECOMMENDATION

The Department recommends that the Commission approve:

1. The 2013 Xcel Electric CIP Tracker Account activity shown in Table 1 above.
2. A DSM financial incentive of \$42,679,496 for Xcel's 2013 electric CIP achievements.
3. A Solar*Rewards financial incentive of \$50,434 for Xcel's 2013 achievements.
4. A CIP Adjustment Factor for 2014/2015 of \$0.001253 per kWh.
5. The discontinuation of CIP carrying charges beginning in the month after the Commission issues its Order in this Docket. In the event that the Commission does not discontinue approving carrying charges for Xcel's CIP tracker, the Department recommends that the Commission not allow Xcel to compute carrying charges on the Company's financial incentive.

/lt

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. E002/M-14-287

Dated this 14th day of July 2014

/s/Sharon Ferguson

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Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_14-287_M-14-287

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Dave	Johnson	N/A	Community Action of Minneapolis	2104 Park Ave S Minneapolis, MN 55404	Paper Service	No	OFF_SL_14-287_M-14-287
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Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_14-287_M-14-287
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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	Yes	OFF_SL_14-287_M-14-287
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Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_14-287_M-14-287
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John	McWilliams	jmm@dairy.net	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_14-287_M-14-287
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David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_14-287_M-14-287

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Gary	Olson		Product Recovery, Inc.	2605 E Cliff Rd Burnsville, MN 55337	Paper Service	No	OFF_SL_14-287_M-14-287
Kim	Pederson	kpederson@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-287_M-14-287
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Bill	Poppert		Technology North	2433 Highwood Ave St. Paul, MN 55119	Paper Service	No	OFF_SL_14-287_M-14-287

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Tom	Smilanich		Passive Concepts	228 6th Ave N South St. Paul, MN 55075	Paper Service	No	OFF_SL_14-287_M-14-287
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John	Steinhoff		Resource Solutions, Inc.	318 Kensington Drive Madison, WI 53704	Paper Service	No	OFF_SL_14-287_M-14-287
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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
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John	Steinhoff		Resource Solutions, Inc.	318 Kensington Drive Madison, WI 53704	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Lisa	Wilson	lisa.wilson@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	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