

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

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

In the Matter of the Application of Minnesota Power for
Authority to Increase Electric Service Rates in Minnesota

Docket No. E-015/GR-19-442

Request for Intervenor Compensation of the Citizens Utility Board of Minnesota

The Citizens Utility Board of Minnesota (“CUB”) is an independent, 501(c)(3) nonprofit organization that advocates for affordable and reliable utility service and clean energy for residential and small business consumers across Minnesota.

In submitting this filing, CUB respectfully requests intervenor compensation in the amount of thirty seven thousand, eight hundred and twenty one dollars (\$37,821) for its intervention in the Minnesota Power rate case that was resolved via the Commission’s order issued on August 7, 2020 (the “Rate Case”). Given the extensive time and expertise required to intervene in a rate case and CUB’s financial situation as a small nonprofit organization, CUB believes this request is reasonable. In addition, this claim is below the statute’s allowable level of \$50,000. We include herein further details regarding our role, and the expenses we incurred, when intervening in the Rate Case to support this intervenor compensation request.

I. Procedural History

On April 23, 2020, Minnesota Power (“the Company”) filed a petition to withdraw its Rate Case. On August 7, 2020, the Commission issued an order approving Minnesota Power’s petition and resolving the Rate Case with conditions.¹ Among the conditions required by the Order is that the Company “provide reasonable intervenor compensation to parties participating in this proceeding with the objective of promoting a public purpose.”²

Pursuant to Minn. Stat. 216B.16 Subd. 10(e), an intervener must file a request for compensation and an affidavit of service within 30 days after the later of (1) the expiration of the period within which a petition for rehearing, amendment, vacation, reconsideration, or reargument must be filed or (2) the date the commission issues an order following rehearing amendment, vacation, reconsideration, or reargument. Minn. Stat. 216B.27 allows an application for rehearing to be filed within 20 days after “service by the commission of any decision constituting an order or determination. Further, Minn. Rule 7829.3000 Subp.1

¹ *In the Matter of the Application of Minnesota Power for Authority to Increase Electric Service Rates in Minnesota*, Docket No. GR-19-442 (Rate Case Docket), Order Approving Petition and Resolving Rate Case with Conditions (Aug. 7, 2020) (Aug. 7 Rate Case Order).

² *Id.* at Order Point 1A.

provides that a party requesting a rehearing, amendment, vacation, reconsideration, or reargument of a Commission decision or order must do so "within 20 days of the date the decision or order is served by the executive secretary." No petition for rehearing, amendment, vacation, reconsideration, or reargument was filed prior to August 27, 2020, the date marking 20 days after the Commission's August 7, 2020 Order. Pursuant to Minn. Stat. 216B.16 Sub 10(e), CUB makes this filing within 30 days following August 27, 2020 in order to request reasonable intervenor compensation from the Company.

II. Legal Standard

Minn. Stat. 216B.16 Subd. 10(b) authorizes the Commission to require the Company to compensate an intervenor if: (1) the intervenor materially assisted the Commission's deliberation, and (2) when lack of compensation would present a financial hardship for the intervenor. Subd. 10(b) provides that, for the purposes of that statute, "materially assisted" means that the intervenor's "participation and presentation was useful and seriously considered, or otherwise substantially contributed to the commission's deliberations in the proceeding." Minn. Stat. 216B.16 Subd. 10(c) further specifies:

In determining whether an intervenor has materially assisted the commission's deliberation, the commission must consider, among other factors, whether:

- I. The intervenor represented an interest that would not otherwise have been adequately represented;
- II. The evidence or arguments presented or the positions taken by the intervenor were an important factor in producing a fair decision;
- III. The intervenor's position promoted a public purpose or policy;
- IV. The evidence presented, arguments made, issues raised, or positions taken by the intervenor would not have been a part of the record without the intervenor's participation; and
- V. The administrative law judge or the commission adopted, in whole or in part, a position advocated by the intervenor.

Minn. Stat. 216B.16 Subd. 10(f) provides additional details on what must be included in an intervenor's compensation request, including certain statements and documents that support the intervenor's assertions about its tax-exempt status and expenditures for which it seeks compensation.

III. Support for Compensation Request

A. Required information

The following information is required by Minn. Stat. 216B.16 Subd. 10(f)(1)-(7):

1) The Citizens Utility Board of Minnesota is the intervenor requesting compensation. CUB's address is:

332 Minnesota St.
Suite W1360
St. Paul, MN 55101

2) Proof of CUB's nonprofit, tax-exempt status is included in Attachment A;

3) CUB requests compensation for its contributions to Docket No. E-015/GR-19-442, titled "In the Matter of the Application of Minnesota Power for Authority to Increase Electric Service Rates in Minnesota."

4) A list of CUB's actual annual revenues and expenses of the organization for year 2019, and projected revenues, revenue sources, and expenses for year 2020, are included in the Statement of Activities (P&L) Document included as Attachment B;

5) CUB's balance sheet for the year 2019 and a current monthly balance sheet (as of July 31, 2020) are included as Attachment C;

6) an itemization of CUB's costs and the total compensation request, along with copies of invoices supporting that itemization, is included as Attachment D; and

7) Subp.10(f)(7) requires an intervenor seeking compensation to provide a narrative explaining why additional organizational funds cannot be devoted to the intervention. CUB responds to this requirement in section C, below.

B. CUB materially assisted the commission's deliberation.

The present rate case was withdrawn before intervenors, including CUB, had the opportunity to submit testimony into the record. Because that makes it difficult for intervenors to demonstrate that they "materially assisted the Commission's deliberation" under the definition included in Minn. Stat. 216B.16 Subd. 10(b), CUB sought, and the PUC provided, clarification that qualifying intervenors may still seek compensation. The Commission's August 7, 2020 Order in this docket stated: "Minnesota Power shall provide reasonable intervenor compensation to parties participating in this proceeding with the objective of promoting a public purpose." CUB's analysis (and testimony, had CUB had the opportunity to present it) met all of the conditions included in Minn. Stat. 216B.16 Subd. 10(c) for requesting intervenor compensation for the reasons set forth below.

1. CUB represented an interest that would not otherwise have been adequately represented.

In this Rate Case, CUB was preparing analysis and testimony on a number of issues that would not have otherwise been represented by an interest representing residential consumers.

CUB witness, Ron Nelson of Strategen Consulting, was preparing a cost of service study intended to more fairly (in our judgment) allocate costs among classes and to better account for how changes in power system technologies and operations must be taken into account when considering costs. Based on this analysis,

Mr. Nelson was preparing recommendations regarding revenue apportionment among classes. In this process, Mr. Nelson examined Minnesota Power's UI Planner model in detail and identified a number of ways in which the model lacked transparency. To our knowledge, no other party representing residential consumers was conducting a cost of service study, developing revenue allocation recommendations, or examining the UI Planner model.

Mr. Nelson was also preparing to address residential rate design and MP's proposed transition from its inverted block rates to a flat rate and, presumably, a future time-of-use rate design. The Energy CENTS Coalition (Energy CENTS), too, was focused on this issue, but unlike Energy CENTS, CUB represents all residential consumers, not only low-income consumers. In particular, we were concerned with the impact that the rate design transitions would likely have on different types of residential consumers, beyond the average consumer, and how to minimize customer confusion through the multiple transitions.

Additionally, Mr. Nelson had begun looking into the application and use of late payment and similar fees by the Company. To our knowledge, no other party addressed this issue.

2. Positions taken by CUB were an important factor in producing a fair decision, and positions taken by CUB would not have been a part of the record without CUB's participation.

As described above, CUB is aware of no other parties who were preparing cost of service studies, cost allocation positions, rate design arguments, and late fees analyses similar to the testimony that our expert witness was preparing to present.

In addition, CUB took unique positions in its comments in response to the Company's petition to move asset-based wholesale credits to the fuel adjustment clause and resolve the rate case. Specifically, CUB identified issues with the Company's cost of service study model that impeded transparency and should be addressed prior to its next rate case and identified the opportunity to consider alternative collection and/or treatment of late payment and similar fees. These positions are discussed further under section 4, below.

3. CUB's position promoted a public purpose or policy.

CUB's mission is to protect the interests of residential and small business customers in affordable, reliable, and clean energy. CUB intervened in this docket because Minnesota Power's application presented a number of issues that would affect those interests, including its preferred cost allocation, rate design, and collection and use of late fees, as outlined above. Though intervenors did not have the opportunity to submit testimony before the rate case was resolved pursuant to the Commission's August 7, 2020 Order, CUB's expert witness was preparing analyses on these issues in order to propose structures that better reflected the interests of ratepayers.

4. The Commission adopted positions advocated by CUB.

CUB positions were approved by the Commission and ordered in its August 7, 2020 Order, which states in part:

- A. Minnesota Power shall provide reasonable intervenor compensation to parties participating in this proceeding with the objective of promoting a public purpose.

- B. Before its next rate case, Minnesota Power shall ensure that parties can modify the Company's class cost-of-service study model inputs and cost allocators to allow parties to receive real-time calculations and outputs. The Company shall also track and report any costs related to complying with this requirement.
- C. In its next rate case, Minnesota Power shall submit information on its process for collecting residential late fees and the costs expended in these collection efforts. Before its next rate case, Minnesota Power shall work with interested parties to discuss alternative methods of allocating late payment and similar fees to residential customers.³

These points (with the exception of intervenor compensation) address issues that CUB identified in its analysis of the Company's Rate Case. CUB discussed the three requests and agreed upon wording with Minnesota Power. They were presented in the joint comments of CUB and Energy CENTS regarding Minnesota Power's petition to move asset-based wholesale credits to the fuel adjustment clause and resolve the rate case (Docket No. E-015/M-20-429).

C. Lack of compensation would present a financial hardship for CUB.

1. The costs presented in CUB's claim reflect reasonable expert witness costs.

CUB's intervenor compensation claim is \$37,821. The request covers only a portion of CUB's costs to intervene in the Rate Case. It includes the costs CUB incurred to engage our expert witness, Mr. Nelson, and support for him from a colleague, Caroline Palmer. CUB is not requesting compensation for our staff's time on the Rate Case, as we are able to cover those costs using other sources of funding.

Mr. Nelson has seven years of experience providing expert testimony in numerous areas. He has testified in seven states, including in the previous Minnesota Power rate case, on behalf of consumer advocates and other parties. Mr. Nelson has provided testimony on embedded and marginal cost studies, rate design, distributed energy resource (DER) compensation and system integration, and revenue decoupling, among other areas. Mr. Nelson's has won contracts through competitive bidding processes in New Hampshire, Massachusetts, Pennsylvania, Utah, and other states, demonstrating that his rates are reasonable.

Though the Rate Case was resolved before parties had the opportunity to present evidence in the record, CUB undertook the majority of our expected expert witness expenditures in preparation to make such a presentation.⁴ Direct testimony was initially due on April 7, 2020.⁵⁶ Mr. Nelson and Ms. Palmer conducted the lion's share of their research and analysis during February and March 2020 in order to meet that deadline. On March 27th, CUB staff had an initial discussion with Minnesota Power representatives about the possibility of resolving the Rate Case. After that discussion, CUB directed Mr. Nelson to pause his work to develop testimony and instead focus on a possible settlement. CUB analyzed Minnesota Power's settlement proposal, worked with the Company to address the three issues described above, and ultimately

³ Aug. 7 Rate Case Order, at Order Point 1.

⁴ The costs incurred by Strategen Consulting and charged to CUB in this case represent more than 75 percent of Strategen's total budget for the rate case, which was not to exceed \$50,000 per its contract with CUB.

⁵ Rate Case Docket, First Prehearing Order (Jan. 16, 2020), at Order Point 11.

supported the resolution of the case in comments filed jointly with the Energy CENTS Coalition on May 11, 2020.⁷

2. The costs presented in CUB's claim represent a significant portion of CUB's unrestricted funds.

The intervenor compensation claim represents 13 percent of CUB's unrestricted balance.⁸ If this claim is not granted, CUB plans to pay the expert witness fees from our board-designated reserve fund. In accordance with best practices for nonprofit management and in order to provide for organizational stability in the case of an unforeseen crisis, CUB is working toward building a board-designated reserve fund to cover at least three months of expenses. In December 2019, CUB's Board of Directors authorized the staff to incur expert witness expenses in order to intervene in this Rate Case with the expectation of applying for intervenor compensation at the conclusion of the case. The Board of Directors authorized covering those expenses from the board-designated reserves in the event that the compensation request is not granted.

Having to use reserve funds for this expense would significantly reduce CUB's reserve fund and harm our ability to weather unexpected events – which is especially important during this time of economic uncertainty. Subtracting the amount of this claim would reduce our reserve balance by more than 20 percent.

III. Conclusion

CUB respectfully requests intervenor compensation in the amount of \$37,821 for its intervention in the Minnesota Power rate case. As outlined above, CUB's intervention meets the requirements of statute and of the Commission's August 7, 2020 Order in this docket.

⁷ See generally, *In the Matter of the Emergency Petition of Minnesota Power for Approval to Move Asset-Based Wholesale Sales Credits to the Fuel Clause Adjustment and Resolve Rate Case*, Docket No. 20-429, Initial Comments of the Citizens Utility Board of Minnesota and the Energy CENTS Coalition (May 11, 2020).

⁸ See Attachment C: July 2020 Balance Sheet – unrestricted liability and equity minus board-designated reserves.

Thank you for your consideration of this request.

Respectfully submitted,

August 28, 2020

/s/ Annie Levenson-Falk

Annie Levenson-Falk

Executive Director

Citizens Utility Board of Minnesota

332 Minnesota Street, Suite W1360

St. Paul, MN 55001

annielf@cubminnesota.org

612-568-5707

/s/ Brian Edstrom

Brian Edstrom

Senior Regulatory Advocate

Citizens Utility Board of Minnesota

332 Minnesota Street, Suite W1360

St. Paul, MN 55001

briane@cubminnesota.org

651-300-4701

INTERNAL REVENUE SERVICE
P. O. BOX 2508
CINCINNATI, OH 45201

DEPARTMENT OF THE TREASURY

Date: **OCT 07 2016**

CITIZENS UTILITY BOARD OF MINNESOTA
332 MINNESOTA ST STE W1360
ST PAUL, MN 55101

Employer Identification Number:
81-2175430
DLN:
17053242312026
Contact Person:
ERIC KAYE ID# 31612
Contact Telephone Number:
(877) 829-5500
Accounting Period Ending:
December 31
Public Charity Status:
170(b)(1)(A)(vi)
Form 990/990-EZ/990-N Required:
Yes
Effective Date of Exemption:
April 11, 2016
Contribution Deductibility:
Yes
Addendum Applies:
no

Dear Applicant:

We're pleased to tell you we determined you're exempt from federal income tax under Internal Revenue Code (IRC) Section 501(c)(3). Donors can deduct contributions they make to you under IRC Section 170. You're also qualified to receive tax deductible bequests, devises, transfers or gifts under Section 2055, 2106, or 2522. This letter could help resolve questions on your exempt status. Please keep it for your records.

Organizations exempt under IRC Section 501(c)(3) are further classified as either public charities or private foundations. We determined you're a public charity under the IRC Section listed at the top of this letter.

If we indicated at the top of this letter that you're required to file Form 990/990-EZ/990-N, our records show you're required to file an annual information return (Form 990 or Form 990-EZ) or electronic notice (Form 990-N, the e-Postcard). If you don't file a required return or notice for three consecutive years, your exempt status will be automatically revoked.

If we indicated at the top of this letter that an addendum applies, the enclosed addendum is an integral part of this letter.

For important information about your responsibilities as a tax-exempt organization, go to www.irs.gov/charities. Enter "4221-PC" in the search bar to view Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, which describes your recordkeeping, reporting, and disclosure requirements.

CITIZENS UTILITY BOARD OF MINNESOTA

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey I. Cooper". The signature is stylized and cursive.

Jeffrey I. Cooper
Director, Exempt Organizations
Rulings and Agreements

Citizens Utility Board
Statement of Activities (P&L) DRAFT
For the twelve months ended December 31, 2019

	Month	Year-to-Date			Annual	
	December	Unrestricted	W Donor Restrictions	December 2019	YTD Budget	Annual Budget
Income						
4000 · Contributions & Support						
4010 · Individual contributions	1,505.00	10,710.15	-	10,710.15	7,000.00	7,000.00
4020 · Foundation Contributions - UR		-	-			
4025 · Foundation Contributions R		149,770.65	50,026.20	199,796.85	425,583.00	425,583.00
4030 · Corp/Organization Contrib. U		4,385.00	-	4,385.00	12,000.00	12,000.00
Released from restriction - prior yr	-	343,834.93	(343,834.93)	-	83,467.00	83,467.00
Total 4000 · Contributions & Support	1,505.00	508,700.73	(293,808.73)	214,892.00	528,050.00	528,050.00
4100 · Government Grants & Contracts						
4120 · State Grants & Contracts	-	3,859.75	-	3,859.75	-	-
Total 4100 · Government Grants & Contracts	-	3,859.75	-	3,859.75	-	-
4200 · Program Income						
4220 · Sponsorships	-	-	-	-	-	-
4230 · Non-Government Grants & Contracts		7,817.41	-	7,817.41	-	-
Total 4200 · Program Income	-	7,817.41	-	7,817.41	-	-
4900 · Other Income						
4910 · Interest Income	153.40	3,106.23	-	3,106.23	1,800.00	1,800.00
4990 · Miscellaneous Income	-	15,105.00	-	15,105.00		
Total 4900 · Other Income	153.40	18,211.23	-	18,211.23	1,800.00	1,800.00
Total Income	1,658.40	538,589.12	(293,808.73)	244,780.39	529,850.00	529,850.00
Expense						
5000 · Personnel Expenses						
5010 · Salaries & Wages	20,598.27	285,282.25	-	285,282.25	305,315.00	305,315.00
5020 · Payroll Taxes	1,515.70	21,476.16	-	21,476.16	23,460.00	23,460.00
5030 · Unemployment Tax	7.27	482.63	-	482.63	400.00	400.00
5040 · Health & Dental Insurance	2,189.11	28,064.13	-	28,064.13	31,500.00	31,500.00
5050 · Retirement	512.46	8,002.72	-	8,002.72	8,786.00	8,786.00
5060 · Workers Compensation	101.91	1,160.26	-	1,160.26	2,500.00	2,500.00
5000 · Personnel Expenses - Other	-	-	-	-	-	-
Total 5000 · Personnel Expenses	24,924.72	344,468.15	-	344,468.15	371,961.00	371,961.00
5100 · Contract & Prof Services						
5105 · Accounting Fees	9,549.00	28,989.00	-	28,989.00	28,000.00	28,000.00
5110 · 403 (b) Management	388.50	2,097.74	-	2,097.74	2,750.00	2,750.00
5115 · Payroll processing fees	83.19	1,047.80	-	1,047.80	1,350.00	1,350.00
5120 · Website	-	-	-	-	500.00	500.00
5130 · Legal Fees	3,228.00	34,853.27	-	34,853.27	-	-
5160 · Professional fees & consulting	6,095.00	36,295.58	-	36,295.58	135,000.00	135,000.00
Total 5100 · Contract & Prof Services	19,343.69	103,283.39	-	103,283.39	167,600.00	167,600.00
5200 · Program Expenses						

	December	Unrestricted	W Donor Restrictions	December 2019	YTD Budget	Annual Budget
5220 · Promotion	(64.54)	25,196.59	-	25,196.59	25,000.00	25,000.00
5290 · Other program expenses	-	99.21	-	99.21	1,000.00	1,000.00
Total 5200 · Program Expenses	(64.54)	25,295.80	-	25,295.80	26,000.00	26,000.00
5300 · Operations						
5305 · Office supplies	-	291.24	-	291.24	600.00	600.00
5310 · Postage, Mailing Service	58.19	578.93	-	578.93	1,000.00	1,000.00
5315 · Printing and Copying	-	1,317.38	-	1,317.38	1,000.00	1,000.00
5320 · Telephone, Telecommunications	120.00	3,173.15	-	3,173.15	2,870.00	2,870.00
5330 · Technology	107.86	3,101.34	-	3,101.34	850.00	850.00
5335 · Books, Subscriptions, Reference	-	-	-	-	-	-
5340 · Dues & Membership	22.93	2,180.53	-	2,180.53	2,500.00	2,500.00
5390 · Miscellaneous Expenses	-	228.75	-	228.75	5,000.00	5,000.00
Total 5300 · Operations	308.98	10,871.32	-	10,871.32	13,820.00	13,820.00
5400 · Facilities, Equip & Insurance						
5410 · Rent, Parking, Utilities	2,633.30	18,667.89	-	18,667.89	18,500.00	18,500.00
5420 · Equip Rental and Maintenance	-	-	-	-	-	-
5425 · Furniture & Equip under \$1k	-	-	-	-	250.00	250.00
5460 · Directors & Officers Liability	-	1,462.00	-	1,462.00	1,750.00	1,750.00
5465 · Insurance - Liabil & ERISA Bond	38.01	455.47	-	455.47	600.00	600.00
Total 5400 · Facilities, Equip & Insurance	2,671.31	20,585.36	-	20,585.36	21,100.00	21,100.00
5500 · Travel and Meetings						
5510 · Meeting, Conference, Convention	265.02	5,582.90	-	5,582.90	5,850.00	5,850.00
5520 · Mileage, Metro Transit, Parking	323.57	4,608.60	-	4,608.60	7,500.00	7,500.00
5525 · Airfare & lodging	-	2,871.90	-	2,871.90	2,500.00	2,500.00
5530 · Travel - board	-	-	-	-	-	-
Total 5500 · Travel and Meetings	588.59	13,063.40	-	13,063.40	15,850.00	15,850.00
5700 · Business Expenses						
5705 · Bank Fees	-	39.95	-	39.95	-	-
5710 · Credit card & online fees	10.20	205.93	-	205.93	350.00	350.00
5720 · Business Registration Fees	-	28.95	-	28.95	125.00	125.00
Total 5700 · Business Expenses	10.20	274.83	-	274.83	475.00	475.00
Total Expense	47,782.95	517,842.25	-	517,842.25	616,806.00	616,806.00
Net Income	(46,124.55)	20,746.87	(293,808.73)	(273,061.86)	(86,956.00)	(86,956.00)
9035 - Reserve		-				
Prior year carryover					113,000.00	113,000.00
Net assets, beginning		92,753.00	398,001.65	490,754.65		
Board reserve				155,000.00		
Net assets, ending		113,499.87	104,192.92	372,692.79		

Citizens Utility Board
Statement of Activities (P&L) DRAFT
For the seven months ended July 31, 2020

	Month	Year-to-Date			Annual	
	July	Unrestricted	W Donor Restrictions	TOTAL Jan- July 2020	YTD Budget	Annual Budget
Income						
4000 · Contributions & Support						
4010 · Individual contributions	70.00	4,741.30	-	4,741.30	9,750.00	13,000.00
4020 · Foundation Contributions - UR	-	331,000.00	-	331,000.00	60,083.38	103,000.08
4025 · Foundation Contributions R	-	66,064.66	108,935.34	175,000.00	534,665.00	603,000.00
4030 · Corp/Organization Contrib. U	-	1,174.38	-	1,174.38	7,500.00	8,000.00
4035 · Corp/Organization Contrib. R	-	25,000.00	4,500.00	29,500.00		
Released from restriction - prior yr	-	29,231.25	(29,231.25)	-		
Total 4000 · Contributions & Support	70.00	457,211.59	84,204.09	541,415.68	611,998.38	727,000.08
4100 · Government Grants & Contracts						
4120 · State Grants & Contracts	-	-	-	-	-	-
Total 4100 · Government Grants & Contracts	-	-	-	-	-	-
4200 · Program Income						
4220 · Sponsorships	-	-	-	-	-	-
4230 · Non-Government Grants & Contracts	-	2,000.00	-	2,000.00	2,000.00	2,000.00
Total 4200 · Program Income	-	2,000.00	-	2,000.00	2,000.00	2,000.00
4900 · Other Income						
4910 · Interest Income	374.79	1,950.62	-	1,950.62	1,312.50	2,250.00
4990 · Miscellaneous Income	-	-	-	-	7,500.00	7,500.00
Total 4900 · Other Income	374.79	1,950.62	-	1,950.62	8,812.50	9,750.00
Total Income	444.79	461,162.21	84,204.09	545,366.30	622,810.88	738,750.08
Expense						
5000 · Personnel Expenses						
5010 · Salaries & Wages	24,347.78	153,201.95	-	153,201.95	205,151.00	378,147.00
5020 · Payroll Taxes	2,049.75	11,168.32	-	11,168.32	15,385.00	28,358.00
5030 · Unemployment Tax	23.48	232.81	-	232.81	514.00	946.00
5040 · Health & Dental Insurance	2,189.91	13,056.76	-	13,056.76	20,854.19	35,750.04
5050 · Retirement	776.34	4,362.83	-	4,362.83	6,270.81	10,749.96
5060 · Workers Compensation	-	1,519.87	-	1,519.87	1,456.00	2,496.00
5000 · Personnel Expenses - Other	-	-	-	-	-	-
Total 5000 · Personnel Expenses	29,387.26	183,542.54	-	183,542.54	249,631.00	456,447.00
5100 · Contract & Prof Services						
5105 · Accounting Fees	3,072.99	9,170.98	-	9,170.98	24,700.00	35,700.00
5110 · 403 (b) Management	390.63	778.21	-	778.21	1,604.19	2,750.04
5115 · Payroll processing fees	-	429.64	-	429.64	882.00	1,512.00
5120 · Website	-	78.68	-	78.68	294.00	504.00
5130 · Legal Fees	416.50	416.50	-	416.50	-	-
5160 · Professional fees & consulting	14,166.54	105,583.70	-	105,583.70	110,441.00	190,756.00
Total 5100 · Contract & Prof Services	18,046.66	116,457.71	-	116,457.71	137,921.19	231,222.04

	July	Unrestricted	W Donor Restrictions	TOTAL Jan-July 2020	YTD Budget	Annual Budget
5200 · Program Expenses						
5220 · Promotion	63.25	891.56	-	891.56	28,612.00	30,002.00
5290 · Other program expenses	-	37.05	-	37.05	1,750.00	3,000.00
Total 5200 · Program Expenses	63.25	928.61	-	928.61	30,362.00	33,002.00
5300 · Operations						
5305 · Office supplies	0.02	59.01	-	59.01	581.00	996.00
5310 · Postage, Mailing Service	-	86.77	-	86.77	581.00	996.00
5315 · Printing and Copying	-	585.40	-	585.40	952.00	2,996.00
5320 · Telephone, Telecommunications	190.00	2,362.13	-	2,362.13	2,254.00	3,864.00
5330 · Technology	199.68	1,854.03	-	1,854.03	3,150.00	3,800.00
5335 · Books, Subscriptions, Reference	-	-	-	-	-	-
5340 · Dues & Membership	49.98	2,662.32	-	2,662.32	1,869.00	3,204.00
5390 · Miscellaneous Expenses	-	-	-	-	-	-
Total 5300 · Operations	439.68	7,609.66	-	7,609.66	9,387.00	15,856.00
5400 · Facilities, Equip & Insurance						
5410 · Rent, Parking, Utilities	1,271.66	7,969.93	-	7,969.93	16,331.00	27,996.00
5420 · Equip Rental and Maintenance	-	-	-	-	-	-
5425 · Furniture & Equip under \$1k	-	-	-	-	1,000.00	1,000.00
5460 · Directors & Officers Liability	-	1,753.00	-	1,753.00	1,022.00	1,752.00
5465 · Insurance - Liabil & ERISA Bond	38.02	387.98	-	387.98	581.00	996.00
Total 5400 · Facilities, Equip & Insurance	1,309.68	10,110.91	-	10,110.91	18,934.00	31,744.00
5500 · Travel and Meetings						
5510 · Meeting, Conference, Convention	(20.55)	396.04	-	396.04	5,169.00	6,004.00
5520 · Mileage, Metro Transit, Parking	-	430.67	-	430.67	4,375.00	7,500.00
5525 · Airfare & lodging	-	-	-	-	2,919.00	5,004.00
5530 · Travel - board	-	-	-	-	-	-
Total 5500 · Travel and Meetings	(20.55)	826.71	-	826.71	12,463.00	18,508.00
5700 · Business Expenses						
5705 · Bank Fees	6.50	46.50	-	46.50	-	-
5710 · Credit card & online fees	3.64	92.36	-	92.36	266.00	456.00
5720 · Business Registration Fees	-	53.95	-	53.95	70.00	120.00
Total 5700 · Business Expenses	10.14	192.81	-	192.81	336.00	576.00
Total Expense	49,236.12	319,668.95	-	319,668.95	459,034.19	787,355.04
Net Income	(48,791.33)	141,493.26	84,204.09	225,697.35	163,776.69	(48,604.96)
9035 - Reserve					23,919.00	
Prior year carryover						103,000.00
Net assets, beginning		144,901.90	50,025.20	194,927.10		
Board reserve				178,916.69		
Net assets, ending		286,395.16	134,229.29	599,541.14		

Citizens Utility Board

Comparative Statement of Financial Position (Balance Sheet) DRAFT

As of December 2019 & 2018

	Unrestricted	W Donor Restrictions	TOTAL 12/31/19	Prior Yr. 12/31/18
ASSETS				
Current Assets				
Checking/Savings				
1000 · UPB Impact Money Manager	-	-	-	-
1100 · Checking - Spire Bank	35,570.76	-	35,570.76	140,278.92
1120 · Spire Savings Account	10.00	-	10.00	10.00
1130 · Spire Money Market	247,424.98	104,192.92	351,617.90	512,911.67
1150 · Pay Pal	623.07	-	623.07	687.91
Total Checking/Savings	283,628.81	104,192.92	387,821.73	653,888.50
Accounts Receivable				
1200 · Accounts Receivable	-	-	-	-
1225 · Grants receivable	-	-	-	-
Total Accounts Receivable	-	-	-	-
Other Current Assets				
1300 · Prepaid Expenses	3,317.12	-	3,317.12	4,046.03
1800 · Other Assets	-	-	-	-
Total Other Current Assets	3,317.12	-	3,317.12	4,046.03
Total Current Assets	286,945.93	104,192.92	391,138.85	657,934.53
TOTAL ASSETS	286,945.93	104,192.92	391,138.85	657,934.53
LIABILITIES & EQUITY				
Liabilities				
Current Liabilities				
Accounts Payable				
2000 · Accounts Payable	12,711.88	-	12,711.88	8,161.42
Total Accounts Payable	12,711.88	-	12,711.88	8,161.42
Other Current Liabilities				
2110 · 403b Payable	-	-	-	-
2115 · Accrued payroll & taxes	-	-	-	-
2120 · EE Reimbursement Payable	630.57	-	630.57	456.76
2200 · Accrued Vacation	5,103.61	-	5,103.61	3,561.70
2210 · Deferred Income	-	-	-	-
Total Other Current Liabilities	5,734.18	-	5,734.18	4,018.46
Total Current Liabilities	18,446.06	-	18,446.06	12,179.88
Total Liabilities	18,446.06	-	18,446.06	12,179.88
Equity				
3200 · Unrestricted Net Assets	92,753.00	-	92,753.00	88,069.22
3210 · Board designated reserves	155,000.00	-	155,000.00	128,999.96
3300 · With Donor Restrictions Net Assets	-	398,001.65	398,001.65	51,086.92
Net Income	20,746.87	(293,808.73)	(273,061.86)	377,598.55
Total Equity	268,499.87	104,192.92	372,692.79	645,754.65
TOTAL LIABILITIES & EQUITY	286,945.93	104,192.92	391,138.85	657,934.53

Citizens Utility Board

Comparative Statement of Financial Position (Balance Sheet) DRAFT

As of July 2020 & 2019

	Unrestricted	W Donor Restrictions	TOTAL 7/31/20	Prior Yr. 7/31/19
ASSETS				
Current Assets				
Checking/Savings				
1000 · UPB Impact Money Manager	-	-	-	-
1100 · Checking - Spire Bank	25,623.92	-	25,623.92	15,165.32
1120 · Spire Savings Account	10.00	-	10.00	10.00
1130 · Spire Money Market	443,339.23	134,229.29	577,568.52	495,724.89
1150 · Pay Pal	237.77	-	237.77	526.00
Total Checking/Savings	469,210.92	134,229.29	603,440.21	511,426.21
Accounts Receivable				
1200 · Accounts Receivable	-	-	-	75,500.00
1225 · Grants receivable	-	-	-	-
Total Accounts Receivable	-	-	-	75,500.00
Other Current Assets				
1300 · Prepaid Expenses	3,815.57	-	3,815.57	4,059.23
1800 · Other Assets	-	-	-	-
Total Other Current Assets	3,815.57	-	3,815.57	4,059.23
Total Current Assets	473,026.49	134,229.29	607,255.78	590,985.44
TOTAL ASSETS	473,026.49	134,229.29	607,255.78	590,985.44
LIABILITIES & EQUITY				
Liabilities				
Current Liabilities				
Accounts Payable				
2000 · Accounts Payable	-	-	-	-
Total Accounts Payable	-	-	-	-
Other Current Liabilities				
2110 · 403b Payable	-	-	-	-
2115 · Accrued payroll & taxes	-	-	-	-
2120 · EE Reimbursement Payable	-	-	-	1,193.32
2200 · Accrued Vacation	7,714.64	-	7,714.64	6,035.30
2210 · Deffered Income	-	-	-	-
Total Other Current Liabilities	7,714.64	-	7,714.64	7,228.62
Total Current Liabilities	7,714.64	-	7,714.64	7,228.62
Total Liabilities	7,714.64	-	7,714.64	7,228.62
Equity				
3200 · Unrestricted Net Assets	144,901.90	-	144,901.90	103,586.35
3210 · Board designated reserves	178,916.69	-	178,916.69	144,166.65
3300 · With Donor Restrictions Net Assets	-	50,025.20	50,025.20	398,001.65
Net Income	141,493.26	84,204.09	225,697.35	(61,997.83)
Total Equity	465,311.85	134,229.29	599,541.14	583,756.82
TOTAL LIABILITIES & EQUITY	473,026.49	134,229.29	607,255.78	590,985.44

Citizens Utility Board of Minnesota

Summary of expenses, MN Power Rate Case (Docket No. E-015/GR-19-442)

Date	Description	Amount
1/31/2020	Strategen Consulting invoice	\$1,916.00
2/29/2020	Strategen Consulting invoice	\$11,929.00
3/31/2020	Strategen Consulting invoice	\$18,736.00
4/30/2020	Strategen Consulting invoice	\$1,922.00
5/31/2020	Strategen Consulting invoice	\$2,923.00
6/30/2020	Strategen Consulting invoice	\$869.00
6/30/2020	Strategen Consulting invoice	-\$474.00
Total		\$37,821.00



STRATEGEN CONSULTING LLC

2150 Allston Way, Suite 400
Berkeley, CA 94704

INVOICE

BILL TO

Citizens Utility Board of
Minnesota-Minnesota Power
332 Mnesota St Ste W1360
Saint Paul, MN 55101
United States

INVOICE # MAV202002334

DATE 01/31/2020

DUE DATE 03/16/2020

TERMS Net 45

BILLED THRU

01/31/2020

DESCRIPTION	RATE	QTY	AMOUNT
Jan 31, 2020; * Director; Discovery; task development; Ron Nelson	316.00	1	316.00
Jan 31, 2020; * Consultant; CCOSS and rate design testimony; Caroline Palmer	200.00	3.50	700.00
Jan 30, 2020; * Consultant; CCOSS testimony & workpapers; Caroline Palmer	200.00	1	200.00
Jan 29, 2020; * Consultant; CCOSS testimony; Caroline Palmer	200.00	3.50	700.00

BALANCE DUE

USD 1,916.00

Tax ID: [REDACTED]

Bank Name: [REDACTED]

Bank Address: [REDACTED]

Account: [REDACTED]

Account Name: Strategen Consulting LLC

Account Type: Checking

SWIFT Code: [REDACTED]

ABA/Wire Transit Number: [REDACTED]



STRATEGEN CONSULTING LLC

2150 Allston Way, Suite 400
Berkeley, CA 94704

INVOICE

BILL TO

Citizens Utility Board of
Minnesota-Minnesota Power
332 Mnesota St Ste W1360
Saint Paul, MN 55101
United States

INVOICE # MAV202002379

DATE 02/29/2020

DUE DATE 03/30/2020

TERMS Net 30

BILLED THRU

02/29/2020

DESCRIPTION	RATE	QTY	AMOUNT
Feb 28, 2020; * Consultant; Late fee research; ROE research; CCOSS analysis; Caroline Palmer	200.00	6	1,200.00
Feb 28, 2020; * Director; Discovery and CCOSS; Ron Nelson	316.00	0.75	237.00
Feb 27, 2020; * Consultant; Discovery sorting and analysis; CCOSS research; Caroline Palmer	200.00	4.50	900.00
Feb 27, 2020; * Director; Discovery and CCOSS analysis; Ron Nelson	316.00	5	1,580.00
Feb 21, 2020; * Consultant; CCOSS methodology; Caroline Palmer	200.00	1.50	300.00
Feb 20, 2020; * Director; Internal meeting; Ron Nelson	316.00	0.50	158.00
Feb 20, 2020; * Consultant; MP Discovery; Caroline Palmer	200.00	5	1,000.00
Feb 19, 2020; * Director; Reviewing testimony and discovery; Ron Nelson	316.00	1.50	474.00
Feb 19, 2020; * Consultant; Large power / Sales forecast discovery; Caroline Palmer	200.00	5	1,000.00
Feb 18, 2020; * Consultant; Large power discovery; Caroline Palmer	200.00	6.50	1,300.00
Feb 14, 2020; * Director; Take creation; Ron Nelson	316.00	0.25	79.00
Feb 13, 2020; * Consultant; Discovery and large power testimony; Caroline Palmer	200.00	3	600.00
Feb 12, 2020; * Director; Reviewing Shimmin; call with Annie; Ron Nelson	316.00	1	316.00
Feb 12, 2020; * Consultant; Large power testimony; Caroline Palmer	200.00	2	400.00
Feb 05, 2020; * Director; Kickoff call; internal meeting; reviewing docket; Ron Nelson	316.00	2.50	790.00
Feb 04, 2020; * Director; Reviewing docket; Ron Nelson	316.00	1	316.00
Feb 03, 2020; * Director; Internal meeting; task development; Ron Nelson	316.00	0.25	79.00
Feb 03, 2020; * Consultant; Familiarize with MP testimony; Caroline Palmer	200.00	6	1,200.00

BALANCE DUE

USD 11,929.00

Tax ID: [REDACTED]

Bank Name: [REDACTED]

Bank Address: [REDACTED]

Account: [REDACTED]

Account Name: Strategen Consulting LLC

Account Type: Checking

SWIFT Code: [REDACTED]

ABA/Wire Transit Number: [REDACTED]



STRATEGEN CONSULTING LLC

2150 Allston Way, Suite 400
Berkeley, CA 94704

INVOICE

BILL TO

Citizens Utility Board of
Minnesota-Minnesota Power
332 Mnesota St Ste W1360
Saint Paul, MN 55101
United States

INVOICE # MAV202002398

DATE 03/31/2020

DUE DATE 04/30/2020

TERMS Net 30

BILLED THRU

03/31/2020

DESCRIPTION	RATE	QTY	AMOUNT
Mar 27, 2020; * Director; Rate case logistics and discovery; Ron Nelson	316.00	0.50	158.00
Mar 23, 2020; * Director; Direct; Ron Nelson	316.00	3.25	1,027.00
Mar 20, 2020; * Director; Direct; Ron Nelson	316.00	0.50	158.00
Mar 20, 2020; * Consultant; Draft direct testimony; Caroline Palmer	200.00	5	1,000.00
Mar 16, 2020; * Director; Internal meeting; Ron Nelson	316.00	0.50	158.00
Mar 13, 2020; * Consultant; Draft CCOSS/jurisdiction testimony; Caroline Palmer	200.00	7.50	1,500.00
Mar 12, 2020; * Director; Outline and discovery; Ron Nelson	316.00	1.50	474.00
Mar 12, 2020; * Consultant; Draft IRs; late fee follow-up; prepare testimony; Caroline Palmer	200.00	8	1,600.00
Mar 11, 2020; * Director; Internal meeting; direct outline and discovery; Ron Nelson	316.00	5	1,580.00
Mar 11, 2020; * Consultant; Review MP discovery; prepare testimony; Caroline Palmer	200.00	6	1,200.00
Mar 10, 2020; * Consultant; Client call; internal call; draft discovery; CCOSS research; Caroline Palmer	200.00	4.50	900.00
Mar 10, 2020; * Director; Meeting with Annie; internal meeting; Ron Nelson	316.00	1.25	395.00
Mar 09, 2020; * Consultant; Testimony outline and CCOSS research; Caroline Palmer	200.00	3	600.00
Mar 06, 2020; * Consultant; Draft outline; Caroline Palmer	200.00	3.50	700.00
Mar 05, 2020; * Director; Discovery and outline; Ron Nelson	316.00	3.50	1,106.00
Mar 05, 2020; * Consultant; CCOSS workpapers; draft discovery; Caroline Palmer	200.00	7	1,400.00
Mar 04, 2020; * Director; CCOSS analysis and discovery; Ron Nelson	316.00	3	948.00
Mar 04, 2020; * Consultant; CCOSS workpapers, and discovery; Caroline Palmer	200.00	7	1,400.00
Mar 03, 2020; * Director; CCOSS analysis and discovery; Ron Nelson	316.00	1.50	474.00
Mar 03, 2020; * Consultant; Draft discovery questions; Caroline Palmer	200.00	6	1,200.00
Mar 02, 2020; * Director; Internal meeting; call with Annie; Ron Nelson	316.00	0.50	158.00

Tax ID: [REDACTED]

Bank Name: [REDACTED]

Bank Address: [REDACTED]

Account: [REDACTED]

Account Name: Strategen Consulting LLC

Account Type: Checking

SWIFT Code: [REDACTED]

ABA/Wire Transit Number: [REDACTED]

DESCRIPTION

RATE

QTY

AMOUNT

Mar 02, 2020; * Consultant; CCOSS RAP review and discovery; Caroline Palmer

200.00

3

600.00

BALANCE DUE

USD 18,736.00

Tax ID: [REDACTED]

Bank Name: [REDACTED]

Bank Address: [REDACTED]

Account: [REDACTED]

Account Name: Strategen Consulting LLC

Account Type: Checking

SWIFT Code: [REDACTED]

ABA/Wire Transit Number: [REDACTED]



STRATEGEN CONSULTING LLC

2150 Allston Way, Suite 400
Berkeley, CA 94704

INVOICE

BILL TO

Citizens Utility Board of
Minnesota-Minnesota Power
332 Mnesota St Ste W1360
Saint Paul, MN 55101
United States

INVOICE # MAV202002418

DATE 04/30/2020

DUE DATE 05/30/2020

TERMS Net 30

BILLED THRU

04/30/2020

DESCRIPTION	RATE	QTY	AMOUNT
Apr 30, 2020; Director; MP COVID filing review; Ron Nelson	316.00	0.75	237.00
Apr 22, 2020; Director; Reveiw of settlement and emails; Ron Nelson	316.00	0.75	237.00
Apr 19, 2020; Director; Settlement call; Ron Nelson	316.00	0.50	158.00
Apr 15, 2020; Director; Settlement review; call with Annie; Ron Nelson	316.00	1	316.00
Apr 14, 2020; Director; Settlement review; Ron Nelson	316.00	0.75	237.00
Apr 10, 2020; Consultant; Intervenor funding research; Caroline Palmer	200.00	1.50	300.00
Apr 09, 2020; Consultant; Intervenor funding research; Caroline Palmer	200.00	1	200.00
Apr 08, 2020; Director; Emails to Annie on settlement and CA cost recovery; Ron Nelson	316.00	0.50	158.00
Apr 02, 2020; Director; Settlement discussions; Ron Nelson	316.00	0.25	79.00

BALANCE DUE

USD 1,922.00

Tax ID: [REDACTED]

Bank Name: [REDACTED]

Bank Address: [REDACTED]

Account: [REDACTED]

Account Name: Strategen Consulting LLC

Account Type: Checking

SWIFT Code: [REDACTED]

ABA/Wire Transit Number: [REDACTED]



STRATEGEN CONSULTING LLC

2150 Allston Way, Suite 400
Berkeley, CA 94704

INVOICE

BILL TO

Citizens Utility Board of
Minnesota-Minnesota Power
332 Mnesota St Ste W1360
Saint Paul, MN 55101
United States

INVOICE # MAV202002457

DATE 05/31/2020

DUE DATE 06/30/2020

TERMS Net 30

BILLED THRU

05/31/2020

DESCRIPTION	RATE	QTY	AMOUNT
May 22, 2020; Director; Review of deferral filing and email; Ron Nelson	316.00	0.50	158.00
May 15, 2020; Director; Analysis of reply comments; Ron Nelson	316.00	0.50	158.00
May 14, 2020; Director; Analysis of reply comments; Ron Nelson	316.00	2.25	711.00
May 13, 2020; Director; Analysis on reply comments; Ron Nelson	316.00	1.25	395.00
May 08, 2020; Director; Response on MP filing; Ron Nelson	316.00	0.25	79.00
May 07, 2020; Director; MP filing; Ron Nelson	316.00	0.50	158.00
May 06, 2020; Director; Review MP settlement filing; CUB comments; Ron Nelson	316.00	1	316.00
May 06, 2020; Director; Settlement letter review + disclaimer language; Matthew McDonnell	316.00	1.50	474.00
May 04, 2020; Director; Covid deferred accounting; Ron Nelson	316.00	1	316.00
May 01, 2020; Director; Call with Annie; Ron Nelson	316.00	0.50	158.00

BALANCE DUE

USD 2,923.00

Tax ID: [REDACTED]

Bank Name: [REDACTED]

Bank Address: [REDACTED]

Account: [REDACTED]

Account Name: Strategen Consulting LLC

Account Type: Checking

SWIFT Code: [REDACTED]

ABA/Wire Transit Number: [REDACTED]



STRATEGEN CONSULTING LLC

2150 Allston Way, Suite 400
Berkeley, CA 94704

INVOICE

BILL TO

Citizens Utility Board of
Minnesota-Minnesota Power
332 Mnesota St Ste W1360
Saint Paul, MN 55101
United States

INVOICE # MAV202002482

DATE 06/30/2020

DUE DATE 07/30/2020

TERMS Net 30

BILLED THRU

06/30/2020

DESCRIPTION	RATE	QTY	AMOUNT
Jun 12, 2020; Director; Call and email with Annie; review of report; Ron Nelson	316.00	1	316.00
Jun 03, 2020; Director; Hearing task; Ron Nelson	316.00	1.25	395.00
Jun 02, 2020; Director; Email; hearing task; Ron Nelson	316.00	0.50	158.00

Thank you for your business. Our office is closed due to COVID 19. If possible, please pay either via bank transfer, ACH, or through the Quickbooks online portal. Thank you!

BALANCE DUE

USD 869.00

Tax ID: [REDACTED]

Bank Name: [REDACTED]

Bank Address: [REDACTED]

Account: [REDACTED]

Account Name: Strategen Consulting LLC

Account Type: Checking

SWIFT Code: [REDACTED]

ABA/Wire Transit Number: [REDACTED]



STRATEGEN CONSULTING LLC

2150 Allston Way, Suite 400
Berkeley, CA 94704

Credit Memo

CREDIT TO

Citizens Utility Board of
Minnesota-Minnesota Power
332 Mnnesota St Ste W1360
Saint Paul, MN 55101
United States

CREDIT # MAV202002489

DATE 06/30/2020

DATE	DESCRIPTION	RATE	QTY	AMOUNT
05/22/2020	May 22, 2020 Ron Nelson Review of deferral file	158.00	1	158.00
05/04/2020	May 4, 2020 Ron Nelson Covid Referral Accounting	316.00	1	316.00

Thank you for your business! Credit memo for invoice MAV20202457
May 2020.

TOTAL CREDIT

USD 474.00

Tax ID: [REDACTED]

Bank Name: [REDACTED]

Bank Address: [REDACTED]

Account: [REDACTED]

Account Name: Strategen Consulting LLC

Account Type: Checking

SWIFT Code: [REDACTED]

ABA/Wire Transit Number: [REDACTED]

CERTIFICATE OF SERVICE

I, Brian Edstrom, hereby certify that I have this day served a true and correct copy of the following document(s) to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

Request for Intervenor Compensation of the Citizens Utility Board of Minnesota

In the Matter of the Application of Minnesota Power
For Authority to Increase Electric Service Rates in Minnesota
Docket No. E015/GR-19-442

Dated this 28th day of August, 2020.

/s/ Brian Edstrom

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Lori	Andresen	info@sosbluewaters.org	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, Minnesota 55803	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Peter	Beithon	pbeithon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kristin	Berkland	kristin.berkland@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
David F.	Boehm	dboehm@bkllawfirm.com	Boehm, Kurtz & Lowry	36 E 7th St Ste 1510 Cincinnati, OH 45202	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-442_Official CC Service List
David	Cartella	David.Cartella@cliffsnr.com	Cliffs Natural Resources Inc.	200 Public Square Ste 3300 Cleveland, OH 44114-2315	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper	115 SW First St Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ron	Elwood	relwood@mnsap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_19-442_Official CC Service List
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_19-442_Official CC Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-442_Official CC Service List
John R.	Gasele	ygasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA	700 Lonsdale Building 302 W Superior St Ste 700 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
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_19-442_Official CC Service List
Barbara	Gervais	toftemn@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_19-442_Official CC Service List
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417 Mountain Iron, MN 55768	Paper Service	No	OFF_SL_19-442_Official CC Service List
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kelsey	Johnson	info@taconite.org	Iron Mining Association	324 West Superior St Ste 502 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Travis	Kolari	N/A	Keetac	PO Box 217 Keewatin, MN 55753	Paper Service	No	OFF_SL_19-442_Official CC Service List
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora	16 W 2nd Ave N PO Box 160 Aurora, MN 55705	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
David	Langmo	david.langmo@sappi.com	Sappi North America	P O Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Emily	Larson	eLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-442_Official CC Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association	P.O. Box 101 Two Harbors, MN 55616	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Patrick	Loupin	PatrickLoupin@Packaging Corp.com	Packaging Corporation of America	PO Box 990050 Boise, ID 83799-0050	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American	255 State Street Floor 4 Boston, MA 02109-2617	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Tony	Mancuso	mancusot@stlouiscounnymn.gov	Saint Louis County Property Mgmt Dept	Duluth Courthouse 100 N 5th Ave W Rm 515 Duluth, MN 55802-1209	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Keith	Matzdorf	keith.matzdorf@sappi.com	Sappi Fine Paper North America	PO Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4 Canada	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Matthew	McClincy	MMcClincy@usg.com	USG	35 Arch Street Clouget, MN 55720	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 Saint Paul, MN 55104-1850	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_19-442_Official CC Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings	PO BOX 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_19-442_Official CC Service List
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher J.	Oppitz	N/A	-	110 1/2 1ST ST E Park Rapids, MN 56470-1695	Paper Service	No	OFF_SL_19-442_Official CC Service List
Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave Cohasset, MN 55721	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Santi	Romani	N/A	United Taconite	PO Box 180 Eveleth, MN 55734	Paper Service	No	OFF_SL_19-442_Official CC Service List
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC 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_19-442_Official CC Service List
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_19-442_Official CC 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_19-442_Official CC Service List
Robert H.	Schulte	rhs@schultheassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America	1405 Lawrence Road Cloquet, Minnesota 55720	Electronic Service	No	OFF_SL_19-442_Official CC Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Karen	Turnboom	karen.turnboom@versocom.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710 St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_19-442_Official CC Service List