



414 Nicollet Mall  
Minneapolis, MN 55401

June 2, 2017

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

—Via Electronic Filing—

RE: REPLY TO DEPARTMENT OF COMMERCE  
2017 GAS UTILITY INFRASTRUCTURE COST RIDER  
DOCKET NO. G002/M-16-891

Dear Mr. Wolf:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission the enclosed Reply to the Response Comments of the Minnesota Department of Commerce, Division of Energy Resources filed on May 18, 2017.

We have electronically filed this document with the Commission, and copies have been served on the parties on the attached service list. If you have any questions regarding this filing, please contact Lisa Peterson at [lisa.r.peterson@xcelenergy.com](mailto:lisa.r.peterson@xcelenergy.com) or (612) 330-7681 or me at [amy.a.liberkowski@xcelenergy.com](mailto:amy.a.liberkowski@xcelenergy.com) or (612) 330-6613.

SINCERELY,

/s/

AMY A. LIBERKOWSKI  
DIRECTOR, REGULATORY PRICING AND ANALYSIS

Enclosures  
c: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
Katie J. Sieben	Commissioner
John A. Tuma	Commissioner

IN THE MATTER OF THE PETITION OF  
NORTHERN STATES POWER COMPANY  
FOR APPROVAL OF A GAS UTILITY  
INFRASTRUCTURE COST RIDER  
TRUE-UP REPORT FOR 2016,  
REVENUE REQUIREMENTS FOR 2017,  
AND REVISED ADJUSTMENT FACTORS

DOCKET No. G002/M-16-891

**REPLY TO  
DEPARTMENT OF COMMERCE  
RESPONSE COMMENTS**

### INTRODUCTION

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this Reply to the May 18, 2017 Response Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the above-referenced docket.

We appreciate the Department's additional review of our Petition and related Reply Comments requesting approval of our 2017 Gas Utility Infrastructure Cost (GUIC) Rider Petition. In this Reply, we respond to issues the Department raised regarding the use of contractors to perform sewer inspections, the assignment of software costs associated with the Pipeline Data Project (PDP), the inclusion of a demand-side management (DSM) adjustment and monthly allocation adjustment in the Company's sales forecast, recovery of distribution valve replacement costs, and reporting on industry use of risk-ranking metrics.

As discussed in this proceeding, the Company's Transmission Integrity Management Program (TIMP) and Distribution Integrity Management Program (DIMP) are safety-related initiatives implemented in response to state and federal regulations. Recovery of associated costs through the GUIC Rider is in the public interest, as it provides for frequent regulatory review as the Company pursues safety improvements.

## REPLY

### A. Sewer Inspection

In its Response comments, the Department raised concerns with the Company's use of outside contractors to perform its Sewer Conflict Inspection program work. As detailed in the Company's Reply Comments, when the need for a sewer conflict inspection program first arose, the Company was responding swiftly and comprehensively to a serious safety incident where intersecting gas and sewer lines caused an explosion in St. Paul. This event resulted in personal injury and property damage.

Inspecting sewers is well outside of the core business operation of a utility company, and in 2010, the Company did not possess the expertise, staff, equipment, or other resources required to perform inspections on these non-Company assets. Additionally, at the time the program was developed, we anticipated that the sewer conflict inspection work would be completed as early as 2012. As is typical of Company processes, where work falls well outside of our core business, we engage third-party professionals via competitive bidding to perform the work on the Company's behalf.

As requested by the Department, the Company provides with this Reply a cost comparison analysis comparing the use of a contractor to perform the inspection work to the combined cost associated with developing a new workforce and purchasing, maintaining, and replacing equipment to perform the sewer inspection work. Attachment A to this filing demonstrates that the Company would have incurred \$1,914,405 in additional costs had it developed the workforce and acquired the equipment needed to perform this work in-house versus outsourcing the work. We do not understand the performance of a detailed cost comparison analysis to have been a prior requirement, and we believe it would be inequitable to apply such a requirement retroactively.

### B. Software Costs

#### 1. *PDP Work Attributable Exclusively to Minnesota*

The Company maintains that Pipeline Data Project (PDP) costs were incurred for updating GIS records exclusively within the state of Minnesota. The Company has provided significant evidence to support this claim, including the following:

- *Vendor Contract.* A copy of the contract with the PDP vendor, Cyient. This contract displays the independently assigned Minnesota-specific Work

Order and Agreement Number that correlates directly to the assigned GUIC Parent Project Number.

- *Vendor Invoices.* Copies of the individual invoices for work performed by Cyient in 2015 and 2016 under this contract. These invoices display the assigned GUIC project name and include itemized charges of the work performed. This work included the processing of “batches” of asset records attributable to the updating of data points in the GIS system specifically for assets located within Minnesota.
- *Map.* A map showing the totality of GIS records updated as a result of the itemized and invoiced work performed by the PDP vendor. This map shows the work performed by Cyient under the GUIC contract was exclusively for Minnesota records and no other Xcel Energy gas jurisdiction.

In conjunction with the Department’s review in this matter, the Company identified that an incorrect contract number was included on seven of the invoices referenced above.<sup>1</sup> The Company notified the vendor of the error and validated that the Company appropriately recorded the charges as Minnesota PDP work. An emailed confirmation from the vendor is included as Attachment B.

## 2. *Quality Assurance Services are not Duplicative of Other Functions*

We agree with the Department that quality control is an industry standard, and we maintain that QA/QC costs are appropriate for GUIC recovery, non-duplicative of any other work performed, and in fact an efficiency gain that benefits customers. The two services at issue — data entry and quality assurance — were imperative to ensure data integrity within the system and verify accurate system records for safety planning. These efficient vendor services resulted in a low per-unit cost. The Company maintains that the PDP Software costs are reasonable in the context of the GUIC statute and respectfully requests the Commission allow recovery of PDP project capital expenditures totaling \$2,023,225.

## C. Sales Forecast

In its March 1, 2017 Reply Comments, the Department concluded the Company’s sales forecasting models are generally appropriate, but recommended that the GUIC recovery rates be based on the Company’s regression model results before monthly sales and DSM adjustments. While we believe the rates proposed in the Company’s request appropriately include the adjustments for reasons discussed here, we do not

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<sup>1</sup> Despite the error on the contract number, the project name is correctly identified on all seven invoices as “GUIDE-MN 2015.”

oppose the Department's recommendation to exclude the adjustments from the sales forecast for purposes of our 2017 GUIC Rider proposal.

1. *DSM Adjustment*

In Response Comments, the Department characterized as misleading the Company's statement that no evidence has been presented in a regulatory record that a DSM adjustment double-counts DSM.<sup>2</sup> We wish to clarify that the Company stated that "...no evidence has been presented in this proceeding or any other proceeding that the inclusion of a **gas** DSM adjustment double-counts DSM."<sup>3</sup> [*emphasis added*] The Department, however repeatedly cites to *electric* rate cases, rather than gas proceedings. No such analysis of historical gas DSM achievements has been conducted, reviewed, litigated, or ruled on, and the Company stands by its statement.

2. *Monthly Allocation Adjustment*

The Company proposed its monthly allocation adjustment because it better aligns forecasted sales with historical actual sales on a calendar-month basis, and it ensures that the annual sales for a given calendar year remain unchanged. Given that both the Company and the Department acknowledge that the impact of these adjustments in this proceeding is only 0.17 percent, however, we do not oppose the Department's recommendation for purposes of this Rider.

**D. Valve Replacement Costs**

Distribution valves provide the ability to shut down portions of the gas system in the event of an emergency, minimizing response time and limiting the number of customers impacted in these events. The Department highlighted the comments of the Office of Attorney General (OAG) and questioned the sufficiency of the Company's cost recovery support for distribution valve replacements under the GUIC. We clarify that the costs for which the Company seeks GUIC recovery arise only after the replacement program was initiated in response to changing federal standards in 2011.<sup>4</sup> These costs are incremental to the much smaller scale of valve-related work performed previously and included in base rates established under the 2010 Test Year.

In Docket No. G002/GR-09-1153, the Company was authorized to collect in base rates a total of \$1,023,768 in the 2010 Test Year for its Main-Renewal blanket expenditures, which is inclusive of amounts that would have funded potential valve

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<sup>2</sup> Department's Response Comments Page 6.

<sup>3</sup> Xcel's Reply Comments Page 10.

<sup>4</sup> See CFR Part 192, Subpart P, Gas Distribution Integrity Management.

replacement activities.<sup>5</sup> Table 1 below displays the overall costs incurred under the main renewal program<sup>6</sup> between 2009 and 2016. Also shown are costs incurred as part of the Distribution Valve Replacement Program since its inception.

<b>Table 1</b>				
<b>Actual Capital Expenditures (CWIP/RWIP) - In Dollars (\$)</b>				
<b>Year</b>	<b>Main Renewal Blanket</b>		<b>GUIC Valve Replacement Program</b>	
	<b>Main Renewal</b>	<b>Valve-Related Work</b>		
2009	\$ 957,621	\$ 8,846	\$ -	
2010	\$ 646,421	\$ 13,734	\$ -	
2011	\$ 1,886,763	\$ (9,866)	\$ -	
2012	\$ 3,317,787	\$ 5,160	\$ 133,392	
2013	\$ 2,295,998	\$ 1,821	\$ 601,887	
2014	\$ 2,833,187	\$ (4,926)	\$ 395,461	
2015	\$ 996,468	\$ -	\$ 586,157	
2016	\$ 1,041,605	\$ -	\$ 533,029	
<b>Total</b>	<b>\$ 13,975,850</b>	<b>\$ 14,769</b>	<b>\$ 2,249,926</b>	

\* Approximately 50% of "GUIC Valve Replacement Program" is recoverable through the GUIC Rider, with the remainder being internal labor, which is not recoverable through the Rider.

\* Excludes Cast Iron Replacement Program, TIMP and DIMP-related costs, and costs incurred in the North Dakota jurisdiction.

\* Excludes valves installed as part of a new business extension or road relocations.

\* Excludes safety valves at Gas Storage (LNG/LPG) facilities.

The Distribution Valve Replacement Program is aligned with federal standards to ensure the integrity of the gas distribution system, is incremental to costs recovered through base rates, and is appropriately recoverable under the GUIC mechanism.

## **E. Risk-Ranking Metrics**

### *1. Standard Deviation*

The Company appreciates the Department's review and continued conversation regarding performance metrics. In the Department's Response Comments, the

<sup>5</sup> The Company submits Attachment C reflecting the total capital costs, by Grand Parent and Description, included in the 2010 Test Year.

<sup>6</sup> The Company also submits Attachment D showing the Company's 2009-2012 actual costs for the Main-Renewal blanket. This attachment includes the all actual costs incurred by NSP-Minnesota Gas by Parent and Child work order.

Department highlights its concern that the Company's data may not be normally distributed. To alleviate this concern, the Company offers to modify its metrics proposal to include the performance of a normality test on the unit cost data. If the normality test shows that the data is abnormally distributed, the Company will provide additional information for 15.8 percent of the projects whose unit cost is the highest; this percentage is the same as would be reported for a normal distribution.

## 2. *American Gas Association SOS Survey*

The Department also referenced the status of the AGA Survey, whereby the Company has sought input from other gas utilities on the development or implementation of performance metrics for integrity management programs. The Department recommended that "the Commission, at a minimum, withhold its decision on the reasonableness of reporting metrics until the Company receives responses from the American Gas Association SOS forum." The Company has received the results from the AGA Survey and is submitting them as Attachment E. The AGA was helpful in facilitating this request on behalf of the Company and its stakeholders. While the process did not produce significant insights, it revealed that respondents have a limited amount of experience with developing performance metrics for integrity management programs.

## **CONCLUSION**

Xcel Energy respectfully requests that the Commission approve the Company's requested recovery of gas utility infrastructure costs through a GUIC Rider and approve the proposed 2017 GUIC Rider factors. The Company has made and continues to make reasonable and prudent investments in pipeline safety for which we seek cost recovery approval, consistent with state statute and previous Commission orders. Among these reasonable and prudent investments are the Company's use of contractors to perform safety inspections on sewer lines, the use of contractors to facilitate the development and retention of high-quality records of the gas system, and the replacement of distribution valves on our system. Additionally, the Company has proposed metrics for assessing the relative priority of safety investments, and we believe the proposed metrics are effective tools to enable Company project prioritization and regulatory review.

Dated: June 2, 2017

Northern States Power Company

**Analysis Assumptions: Cost Comparison of Using Contractor vs. In-House Workforce/Equipment for Sewer Inspection**

1. Estimated annual O&M expense levels for sewer conflict inspections are pulled from the most recent filed petition (16-0891).
2. Assume 5 mainline trucks at \$300K, 5 premise out trucks/vans at \$25K, 2 Emergency trucks/vans at \$25K.
3. Assumed cost to replace specific equipment and vehicles associated with this work. Based the estimates on conversations with our current vendor performing this work and our assumed costs of ownership.
4. Maintenance of equipment, including specific mechanic personnel for unique equipment or equivalent outsourcing.
5. Assumed insurance costs of 12 dedicated vehicles and equipment to perform this work with Company-owned fleet.
6. Wash stations - assumed costs of \$6,000 per station at 14 gas Service Centers, \$1,000 annual maintenance and upkeep of each.
7. Purchase and updates of software system for tracking, monthly fees for electronic storage. Initial and ongoing hardware costs for dispatching and completing work.
8. Assume 2 operator employees per truck at \$60 per hour rate for qualified labor (fully loaded). Also assume 2% annual wage increase. Emergency Inspection - Assume 2 (fully loaded) after hours premise out crews. Premise out 5 fully loaded employees.
9. Overtime and out of town costs are assumed at 10% of labor costs.
10. Assumed 2 (fully loaded) oversight positions to replicate vendor Management and Supervision.
11. Scheduling - In 2010 through 2012, we had a single contractor staff augmentation resource. Once the program expanded and became long-term, we needed to restructure to dispatch, complete and provide QA/QC assistance based on internal auditing results.
13. Plumber costs are assumed for a licensed plumber or an equivalent outsourcing.
14. WACC Assumptions are pulled from 2015 MN Gas Jurisdictional Filing.

Debt	4,349,580
Cost of Debt	5.78%
Equity	4,856,662
Cost of Equity	10.09%
Tax Rate	35.00%
<b>WACC</b>	<b>7.10%</b>



**Cost Comparison of Using Contractor vs. In-House Workforce/Equipment for Sewer Inspection**

Ln.		Actuals						Forecast			
		2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
<b><u>Current State</u></b>											
1	Annual O&M Expenses (est beyond 2016)	\$4,175,186	\$3,639,148	\$3,462,587	\$3,464,732	\$3,447,300	\$3,381,101	\$3,519,807	3,500,000	3,500,000	3,500,000
2	Estimated Discount Factor using 2015 WACC	1	0.93	0.87	0.81	0.76	0.71	0.66	0.62	0.58	0.54
3	PV of Costs	4,175,186	3,397,964	3,018,830	2,820,503	2,620,324	2,399,679	2,332,560	2,165,714	2,022,181	1,888,161
4	Cumulative PV of Costs	4,175,186	7,573,150	10,591,980	13,412,483	16,032,808	18,432,487	20,765,047	22,930,760	24,952,941	26,841,102
<b><u>Owning the Equipment Comparison</u></b>											
5	Trucks/Specialized equipment	1,675,000	-	-	-	-	-	-	-	-	-
6	Equipment/Vehicle Replacement	50,000	100,000	150,000	350,000	350,000	350,000	350,000	350,000	350,000	350,000
7	Vehicle Maintenance	100,000	125,000	150,000	200,000	200,000	200,000	200,000	200,000	200,000	200,000
8	Insurance	28,800	28,800	28,800	28,800	28,800	28,800	28,800	28,800	28,800	28,800
9	Vehicle Fuel	131,000	131,000	131,000	131,000	131,000	131,000	131,000	131,000	131,000	131,000
10	Wash Stations (1 per Gas Service Center, incl maint)	84,000	14,000	14,000	14,000	14,000	14,000	14,000	14,000	14,000	14,000
11	Software - MDTs and Korterra	120,000	40,000	40,000	40,000	40,000	40,000	40,000	40,000	40,000	40,000
12	Employees - fully loaded (17)	2,121,600	2,164,032	2,207,313	2,251,459	2,296,488	2,342,418	2,389,266	2,437,052	2,485,793	2,535,508
13	Overtime and Out of Town Costs (Per Diem, etc.)	212,160	216,403	220,731	225,146	229,649	234,242	238,927	243,705	248,579	253,551
14	Employee Training/Certification	100,000	25,000	25,000	50,000	25,000	25,000	50,000	25,000	25,000	50,000
15	Permits	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000	5,000
16	Management and Supervision (2) fully loaded	200,000	200,000	200,000	200,000	200,000	200,000	200,000	200,000	200,000	200,000
17	Scheduling (1 in '10-12, 2 from 2013-2019) fully loaded	35,000	35,000	35,000	70,000	70,000	70,000	70,000	70,000	70,000	70,000
18	Plumber costs	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000	25,000
19	Dig up, inspection and repair (DRR)	150,000	150,000	125,000	100,000	80,000	80,000	65,000	65,000	60,000	60,000
20	Total Costs	5,037,560	3,259,235	3,356,844	3,690,405	3,694,937	3,745,460	3,806,993	3,834,557	3,883,172	3,962,859
21	Estimated Discount Factor using 2015 WACC	1	0.93	0.87	0.81	0.76	0.71	0.66	0.62	0.58	0.54
22	PV of Costs	5,037,560	3,043,229	2,926,639	3,004,215	2,808,556	2,658,276	2,522,877	2,372,729	2,243,565	2,137,862
23	Cumulative PV of Costs	5,037,560	8,080,789	11,007,428	14,011,643	16,820,199	19,478,475	22,001,352	24,374,081	26,617,646	28,755,507
24	<b>In-house vs Contractor Favorable / (Unfavorable)</b>	<b>(862,374)</b>	<b>(507,640)</b>	<b>(415,449)</b>	<b>(599,160)</b>	<b>(787,391)</b>	<b>(1,045,988)</b>	<b>(1,236,305)</b>	<b>(1,443,321)</b>	<b>(1,664,704)</b>	<b>(1,914,405)</b>

**From:**  
**Sent:** Wednesday, May 31, 2017 4:11 PM  
**To:** Elder, Darius  
**Cc:** Sudbury, Andrew T  
**Subject:** RE: MN Pipeline Data Project

Darius,

After reviewing the invoices listed below, we did in fact list the wrong Contract Number for the Minnesota Pipeline Data Project. We have the correct project name but included the PSCO agreement number in the Title block (see below). This was an error on our part and the work performed and invoiced was for the Minnesota Pipeline Data Project and should have shown agreement number 370563.

Please reach out if you have any further questions.

P.O. No	Xcel Energy Agreement Number: 363185
Project	H7_073-14-C007
Project Name	GUIDE-MN 2015

Sr. Account Manager | Utilities  
Cyient | [www.cyient.com](http://www.cyient.com)  
Seattle, WA

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**From:** Elder, Darius [<mailto:Darius.Elder@xcelenergy.com>]  
**Sent:** Wednesday, May 31, 2017 11:35 AM  
**To:**  
**Cc:** Sudbury, Andrew T <[Andrew.T.Sudbury@xcelenergy.com](mailto:Andrew.T.Sudbury@xcelenergy.com)>  
**Subject:** [EXTERNAL] MN Pipeline Data Project

Through research related to the Minnesota Pipeline Data Project that Cyient completed for Xcel Energy in 2015 we uncovered what we believe to be an error related to the contract number listed on seven invoices. The following invoices appear to have the incorrect contract, number 363185, from an earlier Colorado pipeline data project when they should in fact have been submitted listing invoice number 370563. Can you please review and confirm whether the invoice numbers listed below were in fact related to the Minnesota Pipeline Data project and apply to contract #370563 rather than the contract listed within each invoice?

US02-975192065	61,030.40
US02-975190866	2,484.41
US02-975187662	132,349.92
US02-975200443	63,842.46

US02-975200444	123,031.16
US02-975200445	80,973.18
US02-975200442	60,859.26

Thank you,

**Darius Elder**

**Xcel Energy | Responsible By Nature**

Director Geospatial Asset Data

1123 West 3rd Ave, Denver, CO 80223

P: 303.571.3980 C: 806.420.0707

[darius.elder@xcelenergy.com](mailto:darius.elder@xcelenergy.com)

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**XCELENERGY.COM**

<b>Functional Class Description</b>	<b>Grand Parent</b>	<b>Description</b>	<b>2010 Test Year</b>
Gas Transmission	MN0002905	R-Gas Trans Main-MN	\$165,000
Gas Transmission	MN0002906	R-Gas Trans Reg/Mtr Stat Install-MN	\$1,432,000
Gas Transmission	MNS002905	Gas Trans Main Spec-MN	\$189,400
Gas Distribution	MN0002910	R-Mains New-MN	\$2,440,000
Gas Distribution	MN0002911	R-Main Reinforcement-MN	\$294,000
Gas Distribution	MN0002912	R-Main Relocation-MN	\$6,840,424
Gas Distribution	MN0002913	R-Main Renewal-MN	\$1,023,768
Gas Distribution	MN0002921	R-Services New-Gas-MN	\$4,575,000
Gas Distribution	MN0002924	R-Services Renwl/Cutoff-Gas-MN	\$1,833,840
Gas Distribution	MN0002931	R-Purch Meters-Gas-MN	\$4,199,910
Gas Distribution	MN0002934	R-Non-Trans Reg/Mtr Stat Install-MN	\$368,000
Gas Distribution	MN0002999	R-CIAC-Gas-MN	(\$1,525,000)
Gas Distribution	MNS002912	Main Relocation Spec-MN	\$2,076,800
Gas Distribution	S11095319	Cast Iron Main Reinforcement-MN	\$3,374,000
Gas Intangible	MG5000SFT	Specific < \$5 mm	\$401,444
Gas General	MN0000014	R-Transportation Gas-Fleet-MN	\$1,202,000
Gas General	MN0002935	R-Gas Tools and Equip-MN	\$233,000
Gas General	S10923783	Spec-MN-G-Comm Eq-Cellnet Modules	\$58,740
Gas Other Storage	MN0002903	R-Gas Storage-MN	\$707,409
			\$29,889,735

### **Attachment D**

Company's 2009-2012 actual costs for the Main-Renewal blanket expenditures. Includes all actual costs incurred by NSP-Minnesota Gas by Parent and Child work order.

Note: This attachment has been uploaded to eDockets as a separate file in live Excel spreadsheet format.

## **Attachment E**

### American Gas Association SOS Survey Results

Note: This attachment has been uploaded to eDockets  
as a separate file in live Excel spreadsheet format.

## CERTIFICATE OF SERVICE

I, Carl Cronin, hereby certify that I have this day served copies or summaries of the foregoing documents on the attached list(s) of persons.

xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States Mail at Minneapolis, Minnesota

xx electronic filing

**Docket No. G002/M-16-891**

Dated this 2nd day of June 2017

/s/

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Carl Cronin  
Regulatory Administrator

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_16-891_M-16-891
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Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-891_M-16-891
William A.	Blazar	bblazar@mnychamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-891_M-16-891
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_16-891_M-16-891
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Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-891_M-16-891
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_16-891_M-16-891
Rebecca	Eilers	rebecca.d.eilers@xcelenergy.com	Xcel Energy	414 Nicollet Mall - 401 7th Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-891_M-16-891



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-891_M-16-891
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_16-891_M-16-891
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-891_M-16-891
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_16-891_M-16-891
Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_16-891_M-16-891
Sandra	Hofstetter	sHofstetter@mnchamber.com	MN Chamber of Commerce	7261 County Road H  Fremont, WI 54940-9317	Electronic Service	No	OFF_SL_16-891_M-16-891
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue  St. Paul, MN 55130	Electronic Service	No	OFF_SL_16-891_M-16-891
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-891_M-16-891
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