



Minnesota Energy Resources Corporation
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June 28, 2021

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

VIA ELECTRONIC FILING

Re: In the Matter of Minnesota Energy Resources Corporation's Gas Affordability Program 2020 Annual Report, Docket No. G011/M-21-224

Reply Comments of Minnesota Energy Resources Corporation

Dear Mr. Seuffert:

On June 4, 2021, the Minnesota Department of Commerce, Division of Energy Resources (the "Department") filed Comments in the above-referenced docket recommending that the Minnesota Public Utilities Commission ("Commission") accept Minnesota Energy Resources Corporation's ("MERC" or the "Company's") 2020 Gas Affordability Program ("GAP") Annual Report. The Department further requests that MERC provide, in reply comments, initial thoughts on how to address its large tracker balance, as well as additional information that fully explains the high negative arrearage balance per participant and how this phenomenon is consistent with the arrearage forgiveness terms as set forth in paragraph 2.2 of MERC's GAP tariff.

On June 14, 2021, the Energy CENTS Coalition ("ECC") filed Comments in the above-referenced docket recommending, with respect to MERC's GAP, that the Commission:

- 1) Require the Company to lower its GAP affordability credit percentage from 6% to 3%.
- 2) If the affordability credit percentage is lowered, approve the Company's proposal to suspend the annual program spending cap.
- 3) Require the Company to explain why the average arrearage balance for GAP customers is negative \$1,050.
- 4) Require the Company to provide the current total number of GAP customers and the current number of GAP customers with credit balances.
- 5) Require the Company to explain if a Low Income Home Energy Assistance Program ("LIHEAP") grant is fully applied (one-time) to a GAP customer's past-due balance. If this is not the Company's practice, ECC recommends the Commission require the Company to apply the total GAP customer LIHEAP grant to any past-due balance and to calculate the level of arrearage co-payment and matching Company payment on any remaining past-due balance.
- 6) Require the Company to explain how, if GAP payments are set at 6% of household income, GAP benefits cover 68% of an average annual gas bill.
 - a) Require the Company to provide the average annual income for GAP customers.

- b) Require the Company to explain if, and how, the current average affordability credit contributes to the average negative GAP customer credit balance.

MERC thanks the Department and ECC for their analyses and review and provides the following Reply Comments responding to the Department's and ECC's requests and recommendations.

Tracker Balance

As discussed in MERC's annual report and the Department's Comments, MERC's GAP tracker balance at the end of 2020 was a positive balance of \$2,280,485. In its March 31, 2021 Report, MERC proposed to address this positive balance and the possible need to adjust the surcharge rate in its next GAP Evaluation Report due May 31, 2022. As discussed later in these Reply Comments, MERC proposes some alternatives that, if approved by the Commission, would leverage use of the existing GAP tracker balance to provide relief to certain LIHEAP-eligible customers.

As discussed in the Company's Report, during 2020, participation in MERC's GAP was down due, at least in part, to the COVID-19 pandemic and suspension of disconnection and other collection activities. As MERC transitions to resume collection and disconnection activities in the coming months, the Company anticipates there will be an increased interest in and customer need for the GAP Program, particularly with respect to arrearage forgiveness. As reported in MERC's monthly report in Docket No. G999/CI-20-375, as of the end of April 2021, 30,134 of MERC's 214,382 Residential customers (approximately 14 percent) were past due on their utility bills. As reflected in that same monthly report, the total amount past due for Residential customers as of the end of April 2021 was \$8,268,378.

While the terms of MERC's approved transition plan in Docket No. E,G999/CI-20-375, the extension of the energy assistance application period, and the availability of increased energy assistance funds will help provide support for customers struggling to pay their utility bills, the availability of GAP and available dollars in the program will also provide an important resource to ensure customers struggling to pay their utility bills can do so. If additional customers with current arrears do apply for and enroll in GAP in 2021, having the available tracker balance funds will be valuable to ensure MERC can enroll those customers. To ensure all eligible customers are able to enroll in GAP in 2021, and given the available tracker balance, MERC has proposed to remove the annual cap on spending for 2021 and to utilize the available tracker balance to fund participation in the Program.

Under the Commission's May 26, 2021 Order Adopting Broad Transition Plan Proposal, Suspending Negative Reporting, and Establishing Notice and Communication Requirements in Docket No. E,G999/CI-20-375, the Minnesota utilities were authorized to begin initial outreach to customers regarding the resumption of collections and, if warranted, disconnection activities and to advise customers of the availability of energy assistance and other programs to help them pay for their utility service, beginning May 3, 2021. MERC has begun its outreach to customers with arrears regarding assistance programs, available

payment plan options, collection activities, payment requirements, and service disconnection. The objective of this outreach is to encourage customers to contact the Company to establish a payment plan, and, for those customers who qualify, to enroll in energy assistance and GAP. Because initial outreach is still underway, the extent to which MERC will see a significant increase in GAP applications and enrollments remains unclear. Additionally, it is likely that customers who enroll in GAP after the disconnection suspension will have greater arrears balances than experienced in recent years, which will mean greater arrearage forgiveness credits under the Company's existing GAP program. As disconnection notices begin to be issued in the coming weeks and disconnection activity starts to resume in August 2021, MERC will have a better picture of how GAP enrollment may be impacted.

As noted in the Department's comments, it is possible that in the second half of this year, there may be increased interest in and customer need for GAP, for at least three reasons: 1) increased funding and eligibility for LIHEAP; 2) the resumption of disconnections; 3) higher arrearages for some customers. MERC agrees to report in its 2021 GAP Annual Report to be filed in March 2022 regarding any unusual enrollment trends due to pandemic-related factors, consistent with the Department's recommendation.¹

The Company is also open to exploring program modifications that could use the available GAP program tracker balance to further assist qualifying customers who are struggling to pay their utility bills. In MERC's October 30, 2020 Comments in Docket No. E,G999/CI-20-375, the Company stated it was open to modifying its GAP program parameters to apply a lower percent of income threshold but that such modification would also require transition planning and a transition period to implement such a change. In its annual report, MERC proposed to address that change in its next GAP evaluation to be filed May 31, 2022 in order to allow time to develop a proposed plan for implementation. However, the Company would be open to modifying the program affordability credit from the currently approved 6 percent of income threshold to a 3 percent of income threshold before its next evaluation report.

In order to implement this change however, the Company would require assistance from external sources to obtain current income information for all approximately 1,100 GAP participants. Once the required information is gathered, the Company estimates that it would take approximately 6-9 months to process the information for all of the GAP participants. MERC has attached to these Reply Comments redline tariff revisions for the Commission's consideration reflecting this program modification.

Another program modification that could help LIHEAP customers with current arrears would be utilizing a portion of the GAP tracker balance to pay down LIHEAP customers' arrearage balances on a one-time basis. MERC proposes to include customers who have qualified for LIHEAP in one of the past two years (2019 and 2020) or have currently been approved for LIHEAP and have arrearage balances greater than \$100. Under this proposal, the Company would utilize the tracker balance to eliminate these customers' arrearage

¹ Department Comments at 18.

balances completely. MERC estimates that this proposal would reduce the tracker balance by approximately \$1.1 million, and proposes to implement this one-time arrearage forgiveness credit for qualifying LIHEAP customers by the end of the first quarter of 2022.

MERC requests approval to use the tracker balance to eliminate LIHEAP customer arrearage balances as a one-time program change. MERC has included redline tariff revisions for the Commission's consideration reflecting this request. As shown in the redline tariff revisions, this proposal would require the Commission to temporarily suspend MERC's GAP program annual spending cap and authorize the use of the tracker balance for this purpose.

Negative Arrearage Balance Per Participant

The Department and ECC request that MERC explain the reported high negative arrearage balance per participant of *negative* \$1,050. In particular, the Department questions whether a negative arrearage balance is consistent with paragraph 2.2 of MERC's GAP tariff, since the arrearage forgiveness payments should end once a customer is no longer in arrears. ECC asks the Company to explain if, and how, the current average affordability credit contributes to the average negative GAP customer credit balance.

MERC clarifies that the reported *negative* \$1,050 reflects the average arrearage (account balance) across *all* of MERC's current GAP enrollees, not only those enrollees with arrears. Looking only at newly enrolled 2020 GAP participants with arrears who qualified for and participated in the arrearage forgiveness component of MERC's GAP, the average arrears per customer in 2020 was \$213.86. In 2020, MERC had 16 customers enroll in GAP with arrears, with a total arrears balance of \$3,421.²

The credit balances on GAP customer accounts that leads to an average account balance of negative \$1,050 is due to the monthly affordability credits applied to customer accounts and energy assistance payments ("EAPs"). With respect to the arrearage forgiveness component of MERC's GAP, the Company confirms that once a customer's arrears are paid off through a combination of arrearage forgiveness credits and customer payments, the arrearage forgiveness benefit terminates.³ However, a customer who qualifies for and receives LIHEAP can remain enrolled in GAP after paying down their account arrears. Such customers will continue to receive affordability bill credits, which are one-twelfth of the difference between MERC's estimate of the customer's annual gas bill and 6 percent of the

² See Attachment B to MERC's 2020 GAP Annual Report, Dollar Amount of Arrears, GAP Participant Cohort.

³ MERC's arrearage-forgiveness component consists of a monthly credit that will be applied each month after receipt of the qualified customer's payment. The credit is designed to retire pre-program arrears over a period of up to 24 months, with the Company matching the qualifying customer's contribution to retiring pre-program arrears. The credit is determined by taking the pre-program arrears divided by the number of months to retire the arrears divided by two and then subtracting any EAPs received by the Company on behalf of the customer divided by the number of months remaining to retire the arrears divided by two.

customer's household income, as provided by the customer to MERC.⁴ Additionally, customers enrolled in GAP also will receive EAPs. In the event that the EAPs plus the affordability credit exceeds a customer's monthly utility bill, that customer will accumulate a credit balance on their account.

As a second alternative proposal to help non-GAP LIHEAP customers with current arrears, MERC proposes to reallocate the negative arrears balances (i.e., credit balances) of GAP participants to pay down non-GAP, LIHEAP customers' arrearage balances. There are currently 475 GAP accounts that have credit balances over \$500, totaling approximately \$1.2 million. As stated above, the arrearage balances of customers who currently qualified for LIHEAP, or have qualified in one of the past two years, and have arrearage balances greater than \$100, amounts to approximately \$1.1 million.

The Company notes that both this proposal of applying the account credit balances of GAP participants to pay down other non-GAP LIHEAP customers' arrearage balances and the proposal to utilize a portion of the GAP tracker balance to pay down non-GAP LIHEAP customers' arrearage balances have the same goal of reducing LIHEAP customers' arrears balances. Therefore the Commission would only need to approve one of these proposals.

MERC requests that the proposed reallocation of GAP credit balances to eliminate LIHEAP customer arrearage balances be a one-time program change. MERC has included as an attachment to these Reply Comments redline tariff revisions for the Commission's consideration reflecting this request.

Additional Requested Information

As requested by ECC, the current total number of GAP customers is approximately 1,100, and as stated above, the current number of GAP customers with a credit balance over \$500 is 475. ECC additionally requested that the Company provide the average annual income for GAP customers, but MERC does not maintain annual income for GAP customers. Under the Company's tariffs, GAP participants must agree to notify MERC of any changes in address, income level, or household size. However, MERC does not require customers to reenroll in the program each year.

ECC also requested that the Company explain if a LIHEAP grant is fully applied (one-time) to a GAP customer's past-due balance. MERC's GAP requires that the customer receive their EAP prior to being enrolled, and MERC fully applies EAP(s) to the GAP customer's arrearage balance, applying it to the oldest arrears after the current bill is paid. Therefore the Company is currently calculating the level of arrearage co-payment and matching Company payment on any remaining past-due balance after EAP is applied. However, the Company notes that the EAP is allowed to pay the customer installment payments, rather than a one-time payment. If a customer receives the EAP in installment payments, this can impact the timing of the application of the EAPs to customers' arrearage balances.

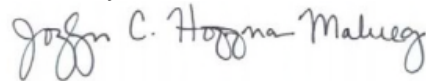
⁴ MERC Tariff Sheet No. 7.09, Section 2.1.

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ECC also requested that the Company to explain how, if GAP payments are set at 6% of household income, GAP benefits cover 68% of an average annual gas bill. ECC notes in its comments that although MERC has a lower annual customer bill (\$655 compared to \$708 - \$1,096 for the other gas utilities), their affordability credit is higher compared to the other gas utilities (\$443 compared to \$175 - \$317). MERC responds that there are GAP customers who are receiving a percent of income credit (i.e. affordability credit) that exceeds what their monthly bills continue to be each month. This typically occurs due to the cost of gas being higher at the time of the customer's GAP application. Due to this situation occurring with the affordability credits, along with the continued receipt of annual EAP payments, the effect is that the customers' credits are higher than their annual cost.

Please contact me at (414) 221-4208 if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely,



Joylyn C. Hoffman Malueg
Project Specialist 3
Minnesota Energy Resources Corporation

Enclosures
cc: Service List

Redlined Tariff Sheets

GAS AFFORDABILITY PROGRAM (GAP)

~~5th~~ Revised Sheet No. 7.09

1. Availability:

GAP is available to residential customers in the MERC Minnesota service area who have been qualified and receive assistance from the Low Income Home Energy Assistance Program (“LIHEAP”) during the federal fiscal year (“Program Year”).

2. Program Description and Rate Impact for Qualifying Customers:

This Program shall meet the conditions of Minnesota Statutes, Chapter 216B.16, Subd. 15 on low income programs. The Program has two components: 1) Affordability, and 2) Arrearage Forgiveness. MERC or an agent of MERC, will review current billing and consumption information, approved LIHEAP benefits and household income information as submitted to MERC to determine a Qualified Customer’s affordability bill credit and arrearage forgiveness. A Qualified Customer’s payment each month shall include both payment of the customer’s current month’s bill -after inclusion of the affordability bill credit, and payment of a portion of the Qualified Customer’s pre-program arrears.

2.1. *Affordability Component:*

The Affordability component consists of a bill credit determined as one-twelfth of the difference between MERC’s estimate of the Qualified Customer’s annual gas bill and ~~36~~% of the Qualified Customer’s household income as provided by the Qualified Customer to MERC. This bill credit is a Program cost that will be included in the Tracker. Any energy assistance sums not applied to arrears will be applied to a Qualified Customer’s current bill. In instances where a Qualified Customer accrues a credit balance on their account, the credit balance may be removed from the customer account and utilized for other purposes deemed reasonable by the Commission.

2.2. *Arrearage Forgiveness Component:*

The Arrearage Forgiveness component consists of a monthly credit that will be applied each month after receipt of the Qualified Customer’s payment. The credit will be designed to retire pre-program arrears over a period of up to 24 months, with the Company matching the Qualifying Customer’s contribution to retiring pre-program arrears. The credit is determined by taking the pre-program arrears divided by the number of months to retire the arrears divided by two and then subtracting any energy assistance sums received by the Company on behalf of the customer divided by the number of months remaining to retire the arrears divided by two. This arrearage forgiveness credit is a Program cost that will be included in the Tracker. MERC may also utilize the Tracker balance to eliminate LIHEAP customer arrears as authorized by the Commission.

GAS AFFORDABILITY PROGRAM (GAP)
(Continued)

~~5th~~ Revised Sheet No. 7.10

3. Conditions of Service:

- 3.1. Enrollment participation is limited to a first come first served basis until the estimated Program dollar cap is reached. This limitation is suspended for calendar year 2021 and calendar year 2022.
- 3.2. Before the start of an enrollment period, MERC will mail information on the Program and an application to participate in the Program to targeted current LIHEAP customers in arrears. The application for participation must be completed in full and returned to MERC before the close of the enrollment period.
- 3.3. Regardless of arrears balances, MERC agrees to maintain service and suspend collection activities to Qualified Customers if they maintain their payment schedule.
- 3.4. Qualified Customers must maintain an active MERC account in said customer's name at their permanent primary residence only to be eligible for this Program.
- 3.5. Qualified Customers agree to notify MERC of any changes in address, income level, or household size. Such changes may result in removal from the Program. Additionally, Qualified Customers who do not continue to qualify under the provisions of Section 1 above can be removed from the Program.
- 3.6. If a Qualified Customer fails to pay two consecutive monthly payments in full under the Program, they will be terminated from the Program and will be subject to MERC's regular collection practices including the possibility of disconnection.

4. Funding:

- 4.1. Total Program costs, which include start-up costs, Affordability component, Arrearage Forgiveness component and incremental administration costs incurred collectively by MERC shall not exceed \$750,000 per year plus the estimated tracker balance as of December 31, 2011. This annual spending cap is suspended for calendar year 2021 and calendar year 2022. MERC shall limit administrative costs included in the Tracker (except start-up related costs) to 5% of total Program costs. Administrative costs will include, but are not limited to, the costs to inform customers of the Program and costs to process and implement enrollments.
- 4.2. MERC shall recover Program costs in the Delivery Charge applicable to all firm service customers receiving service under Rate Schedules GS-NNG General Service and GS-Consolidated General Service.
- 4.3. A tracking mechanism ("Tracker") will be established to provide for recovery of actual Program costs as compared to the recovery of Program costs through rates. MERC will track and defer Program costs with regulatory approval. The prudence of the Program costs are subject to regulatory review.

Clean Tariff Sheets

GAS AFFORDABILITY PROGRAM (GAP)

5th Revised Sheet No. 7.09

1. Availability:

GAP is available to residential customers in the MERC Minnesota service area who have been qualified and receive assistance from the Low Income Home Energy Assistance Program (“LIHEAP”) during the federal fiscal year (“Program Year”).

2. Program Description and Rate Impact for Qualifying Customers:

This Program shall meet the conditions of Minnesota Statutes, Chapter 216B.16, Subd. 15 on low income programs. The Program has two components: 1) Affordability, and 2) Arrearage Forgiveness. MERC or an agent of MERC, will review current billing and consumption information, approved LIHEAP benefits and household income information as submitted to MERC to determine a Qualified Customer’s affordability bill credit and arrearage forgiveness. A Qualified Customer’s payment each month shall include both payment of the customer’s current month’s bill after inclusion of the affordability bill credit, and payment of a portion of the Qualified Customer’s pre-program arrears.

2.1. *Affordability Component:*

The Affordability component consists of a bill credit determined as one-twelfth of the difference between MERC’s estimate of the Qualified Customer’s annual gas bill and 3% of the Qualified Customer’s household income as provided by the Qualified Customer to MERC. This bill credit is a Program cost that will be included in the Tracker. Any energy assistance sums not applied to arrears will be applied to a Qualified Customer’s current bill. In instances where a Qualified Customer accrues a credit balance on their account, the credit balance may be removed from the customer account and utilized for other purposes deemed reasonable by the Commission.

2.2. *Arrearage Forgiveness Component:*

The Arrearage Forgiveness component consists of a monthly credit that will be applied each month after receipt of the Qualified Customer’s payment. The credit will be designed to retire pre-program arrears over a period of up to 24 months, with the Company matching the Qualifying Customer’s contribution to retiring pre-program arrears. The credit is determined by taking the pre-program arrears divided by the number of months to retire the arrears divided by two and then subtracting any energy assistance sums received by the Company on behalf of the customer divided by the number of months remaining to retire the arrears divided by two. This arrearage forgiveness credit is a Program cost that will be included in the Tracker. MERC may also utilize the Tracker balance to eliminate LIHEAP customer arrears as authorized by the Commission.

GAS AFFORDABILITY PROGRAM (GAP)
(Continued)

5th Revised Sheet No. 7.10

3. Conditions of Service:

- 3.1. Enrollment participation is limited to a first come first served basis until the estimated Program dollar cap is reached. This limitation is suspended for calendar year 2021 and calendar year 2022.
- 3.2. Before the start of an enrollment period, MERC will mail information on the Program and an application to participate in the Program to targeted current LIHEAP customers in arrears. The application for participation must be completed in full and returned to MERC before the close of the enrollment period.
- 3.3. Regardless of arrears balances, MERC agrees to maintain service and suspend collection activities to Qualified Customers if they maintain their payment schedule.
- 3.4. Qualified Customers must maintain an active MERC account in said customer's name at their permanent primary residence only to be eligible for this Program.
- 3.5. Qualified Customers agree to notify MERC of any changes in address, income level, or household size. Such changes may result in removal from the Program. Additionally, Qualified Customers who do not continue to qualify under the provisions of Section 1 above can be removed from the Program.
- 3.6. If a Qualified Customer fails to pay two consecutive monthly payments in full under the Program, they will be terminated from the Program and will be subject to MERC's regular collection practices including the possibility of disconnection.

4. Funding:

- 4.1. Total Program costs, which include start-up costs, Affordability component, Arrearage Forgiveness component and incremental administration costs incurred collectively by MERC shall not exceed \$750,000 per year plus the estimated tracker balance as of December 31, 2011. This annual spending cap is suspended for calendar year 2021 and calendar year 2022. MERC shall limit administrative costs included in the Tracker (except start-up related costs) to 5% of total Program costs. Administrative costs will include, but are not limited to, the costs to inform customers of the Program and costs to process and implement enrollments.
- 4.2. MERC shall recover Program costs in the Delivery Charge applicable to all firm service customers receiving service under Rate Schedules GS-NNG General Service and GS-Consolidated General Service.
- 4.3. A tracking mechanism ("Tracker") will be established to provide for recovery of actual Program costs as compared to the recovery of Program costs through rates. MERC will track and defer Program costs with regulatory approval. The prudence of the Program costs are subject to regulatory review.

CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 28th day of June, 2021, on behalf of Minnesota Energy Resources Corporation (MERC) I electronically filed a true and correct copy of the enclosed Reply Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 28th day of June, 2021.

/s/ Kristin M. Stastny

Kristin M. Stastny

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_21-224_M-21-224
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_21-224_M-21-224
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_21-224_M-21-224
Daryll	Fuentes	energy@usg.com	USG Corporation	550 W Adams St Chicago, IL 60661	Electronic Service	No	OFF_SL_21-224_M-21-224
Joylyn C	Hoffman Malueg	Joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources	2685 145th St W Rosemount, MN 55068	Electronic Service	Yes	OFF_SL_21-224_M-21-224
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-224_M-21-224
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-224_M-21-224
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_21-224_M-21-224
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_21-224_M-21-224
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-224_M-21-224

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_21-224_M-21-224
Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	Yes	OFF_SL_21-224_M-21-224
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_21-224_M-21-224
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-224_M-21-224
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-224_M-21-224