85 7th Place East, Suite 500, St. Paul, MN 55101-2198
main: 651.296.4026
tty: 651.296.2860
fax: 651.297.7891
www.energy.mn.gov

August 1, 2012

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. G011/M-11-1083, G011/M-11-1084 and G007/M-11-1088

Dear Dr. Haar:

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

> Requests *(Petitions)* by Minnesota Energy Resources Corporation (MERC or the Company) for approval by the Minnesota Public Utilities Commission (Commission) of changes in demand entitlements for its Viking Gas Transmission Company (Viking) PGA system (11-1083), Northern Natural Gas (Northern or NNG) Transmission System (11-1084) Purchased Gas Adjustment (PGA) and Northern Minnesota Utilities (NMU) System (11-1088) PGA effective November 1, 2011.

The filings were submitted on November 1, 2011. The petitioner is:

> Gregory J. Walters
> Minnesota Energy Resources Corporation
> 3460 Technology Drive NW
> Rochester, MN 55901

The Department filed its *Comments* regarding MERC's Northern PGA system and NMU PGA system on March 12, 2012. In each of these filings, the Department accepted the Company's peak day analysis and withheld approval of the Company's proposed level of demand entitlements until the Company provided clarification in its *Reply Comments*. Based on the further analysis within, the DOC recommends that the Commission **approve** MERC's demand entitlement changes, with a revision to MERC's rate design.

Given similar recommendations in each filing, the DOC files a single set of *Response Comments* for these dockets.

Sincerely,

/s/ SACHIN SHAH
Rates Analyst

SS/ja
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

RESPONSE COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NOS. G011/M-11-1083, G011/M-11-1084 AND G007/M-11-1088

I. BACKGROUND

The following rounds of Comments have been submitted to the Minnesota Public Utilities Commission (Commission) in Minnesota Energy Resources Corporation-PNG's (MERC-PNG) and Minnesota Energy Resources Corporation-NMU's (MERC-NMU), (together, MERC or the Company) demand entitlement petitions for its Northern Natural Gas (Northern or NNG) Purchased Gas Adjustment (PGA) system (Docket No. G011/M-11-1084), NMU PGA system (Docket No. G011/M-11-1088), and the Viking Gas Transmission Company (Viking) PGA system (Docket No. G007/M-11-1083).

- November 1, 2011, MERC's initial *Petition* in each PGA system demand entitlement filing;
- January 10, 2012, Minnesota Department of Commerce, Division of Energy Resources (DOC or Department) *Comments* in the Viking PGA system demand entitlement filing (Docket No. G011/M-11-1083);
- January 13, 2012, MERC's Reply Comments in Viking PGA system demand entitlement filing;
- March 12, 2012, DOC *Comments* in the Northern and NMU PGA system demand entitlement filings; and
- August 1, 2012 DOC *Response Comments* in the Northern, Viking and NMU PGA system demand entitlement filings.

The Department notes that there were no issues initially pertaining to MERC's Viking PGA system demand entitlement filing since the DOC accepted the Company's demand entitlement filing. However, since MERC's demand entitlement analyses and filings are related in many

ways, the Department's *Response Comments* relate, at least in part, to the Company's Viking PGA.

II. THE DEPARTMENT'S RESPONSE TO MERC'S REPLY COMMENTS

MERC's response to the Department's various demand entitlement filings include topics that are interrelated and specific to each demand entitlement filing. Each topic is discussed separately below and, if a topic is relevant to multiple PGA systems, the DOC acknowledges that fact at the beginning of the section.

A. DOC RESPONSE REGARDING THE NNG ZONE GDD OPTION

In the Department's Northern and NMU PGA demand entitlement *Comments*, the Department expressed its views on MERC's proposal to replace the LS Power peaking service with the NNG Zone physical Gas Delivered Daily (GDD) call Option by stating the following:

> However, had MERC not terminated its LSP peaking provision with LS Power it would have had an increase in overall entitlements and a higher resulting reserve margin. In its *Petition,* MERC states that it replaced the LSP peaking capability with the NNG Zone GDD Option. This swap has the effect of significantly decreasing the capacity costs of the peaking service to approximately 10 percent of the previous LS Power costs. While MERC's proposal appears to be reasonable, in order to verify MERC's comparison in cost savings, the Department seeks clarification and requests MERC to provide the following additional information:
>
> - Details on the Call Option contract such as the volumetric rates, the reservation rates, which party is responsible for capacity to ensure supply on a peak day and whether those transportation costs are included in the rate and costs shown in the Petition;
>
> - A comparable cost/benefit analysis to the LS Power contract assuming that no winter capacity may be available on NNG; and
>
> - A detailed explanation on the reliability aspect of the Company's choice to enter into an options contract for peaking service in the winter period and whether this is a short-term or a long-term contract.

The Company provided a detailed response to these clarification requests and additional analyses in both its NNG and NMU PGA system *Reply Comments*. MERC provides a detailed explanation by stating the following:

> The total reservation cost of the transaction was $34,125 (PNG-NNG $30,672 and NMU $3,453). The reservation cost was calculated by taking the daily call option volume of 12,500 Dth times 91 days (number of days during the term) times $.03 reservation rate (12,500 x 91 x $.03). If MERC had called on the gas daily option, MERC would have paid a volumetric rate of IFERC Ventura + $.61. The call option was a delivered service, meaning MERC's supplier would utilize there own firm NNG transportation to deliver the supply to MERC's Zone EF delivery point. The $.61 premium would include the cost of NNG's TF5 maximum tariff rate, plus cost of fuel, transportation commodity plus ACA. MERC only pays for volumetric charges only if the option was called on. As stated previously, this transaction was entered into to meet the theoretical peak day. MERC did not call on the gas daily call option, so MERC incurred no volumetric charges.

With regards to the clarification and request for the comparable cost/benefit analyses to the LS Power contract assuming that no winter capacity may be available on NNG, the Company in its *Reply Comments* states the following:

> To compare the gas daily call option to cost of NNG TF5 capacity, assuming capacity is available, MERC would have to contract for the entire winter period, November through March at maximum tariff rates. The cost of 12,500 Dth of NNG TF5 capacity would be $947,063 (12,500 Dth x $15.153 TF5 maximum tariff rate x 5 months). By entering into the gas daily call option, MERC would have recognized a savings in demand costs of $902,938 for MERC's PNGNNG and NMU customers.

With regards to the clarification and explanation sought by the Department on the reliability aspect of the Company's choice to enter into an options contract for peaking service in the winter period and whether this is a short-term or a long-term contract, the Company in its *Reply Comments* states the following:

> The gas daily call option delivered to MERC's EF Zone that MERC entered into was a short term contract for a period starting December 1, 2011, through February 29, 2012. The purpose of the contract was to replace the LS Power contract, meet the theoretical

> peak day and address the positive reserve margins that have occurred in the previous demand entitlement filings.

The Department appreciates the additional information and clarification provided by the Company which confirms that the proposal to swap the LS Power peaking capability with the NNG Zone GDD option was indeed reasonable. In terms of reliability, as noted in the DOC's *Comments*, MERC's 2010-2011 NNG design day requirements (overall needs of its customers on a design day) increased by 16,584 Mcf (or approximately 8.52 percent) from the previous year. The Company's proposal would decrease the design-day (winter) capacity by 12,191 Dekatherms (Dkt). As discussed in the DOC *Comments*, it was appropriate for MERC to decrease its capacity even though the needs of its customers increased because MERC's previous reserve requirement was excessive at approximately 20 percent compared to the usual level of approximately 5 percent.

As a result of the additional clarification and information provided by the Company, the Department does not have any concerns with Company's use of the NNG Zone GDD option and concludes that the Company's proposal is reasonable.

B. DEPARTMENT RESPONSE REGARDING THE COMPANY'S CONTRACT DEMAND UNITS

In the Department's Northern and NMU PGA system demand entitlement *Comments*, the DOC sought clarification on the amount of contract demand (CD) units by stating the following:

> The Department also seeks clarification of the amount of contract demand (CD) units shown in Attachment 5 of the Company's *Petition*. The Company's Attachment 5 indicates 95 CD units; however, in the Company's November 2011 PGA for MERC-PNG Northern it appears that no CD units are shown. In previous demand entitlement petitions, the Company has had zero CD units and typically the CD units have been excluded by the Company from both the total firm entitlement and design day. The Department requests that MERC provide clarification regarding these differences in its *Reply Comments*.

The Company in its *Reply Comments* stated that the 95 CD units were an error ad that there should have been no CD units in Attachment 5 of the Company's Petition. As a result of the Company's clarification, the DOC no longer has any concerns with the amount of CD units.

C. DEPARTMENT RESPONSE REGARDING CONTRACT NO.112486 (TFX-5) SERVICE

In the Department's Northern and NMU PGA system demand entitlement *Comments*, the DOC sought clarification on the amount of units associated with contract no. 112486 (TFX-5) service by stating the following:

> With regards to Contract No. 112486 with TFX-5 service, in previous demand entitlement filings in Docket Nos. G011/M-09-1284 and G011/M-10-1168 for MERC-PNG and in Docket Nos. G007/M-09-1282 and G007/M-10-1166 for MERC-NMU, the Company has had a total entitlement of 1,800 Dkt which has been allocated entirely to MERC-PNG or allocated to MERC-PNG and MERC-NMU in the amount of 1,605 and 195 Dkt respectively. However in the instant Petitions for both MERC-PNG and MERC-NMU, the resulting amount is (1,800 + 182) 1,982 Dkt respectively. Please see Department Attachment 3. As a result, the Department seeks clarification from the Company in its *Reply Comments* on whether it increased its capacity on this contract or if there was an error in the allocation between MERC-PNG and MERC-NMU.

The Company in its *Reply Comments* states that the same amount of capacity (59,171 Dth) was allocated between Northern and NMU PGA system demand entitlement filings in the 2010-2011 and the 2011-2012 (current Petition) demand entitlement filings. A look at Department Attachment 3 included in the DOC's *Comments* confirms this fact as shown below:

112486 (TFX-5)	Northern	Northern	NMU	NMU	Total
2010-2011	51,163	1,605	6,208	195	59,171
2011-2012	51,383	1,800	5,806	182	59,171

With the Company's additional clarification and confirmation provided in its *Reply Comments*, the DOC no longer has any concerns with Contract No. 112486 (TFX-5).

D. DEPARTMENT RESPONSE REGARDING STORAGE CONTRACTS

In the Department's Northern and NMU PGA system demand entitlement *Comments*, the DOC sought clarification on the storage contracts by stating the following:

> With regards to the storage contracts the Department observes the following in the Company's previous demand entitlement filings in Docket Nos. G011/M-07-1405, G011/M-08-1328, G011/M-09-1284 and G011/M-10-1168:

> - The storage contract numbers change from 112490 to 118657; 113704 to 118215 to 119884 to 121292 to 122800; and
>
> - The storage cycle volumes appear to be unrelated to the Maximum Storage Quantity (MSQ). For example, for storage contract number 118215 in Docket No. G011/M-08-1328, the storage cycle volumes are 36,221 in Attachment 4 but the MSQ in Attachment 5 is 18,110.
>
> The Department seeks clarification from the Company as to why the storage contract numbers keep changing and for the Company to verify the storage cycle volumes, the MSQ numbers and the storage reservation numbers and all of the calculations that are shown in DOC Attachment 3 for both MERC-PNG and MERC-NMU.

The Company in its *Reply Comments* states the following:

> Contract number 121292 for 400,000 Dth that was filed in the 2010/11 Demand Entitlement filing terminated on 05/31/11. That agreement was a one year storage release of excess storage that LS Power had contracted with NNG. MERC agreed to acquire 400,000 Dth from LS Power for another one year term, that was effective June 1, 2011 through May 31,2012, which is reflected in the 2011/12 Demand Entitlement filing. Since this is handled via a storage release through NNG, NNG terminated the 121292 contract and assigned the new 122800 contract. NNG invoices MERC for the 400,000 Dth of capacity charges and LS Power receives a credit from NNG. In regards to the storage cycle volumes, the MSQ numbers and storage reservation numbers, MERC allocates the capacity between PNG-NNG and NMU based on theoretical peak day. The allocated percentages in the 2010/11 filing was 89.18% PNG-NNG and 10.82% NMU. The allocated percentages in the 2011/12 filing was 89.88% PNG-NNG and 10.12% NMU. The change in the allocated percentages caused the TF5 volumes to increase on PNG-NMU and decrease on NMU.

The Company provided a reasonable explanation on why the Storage contract numbers change and as such the DOC does not have any concerns with the changing storage contract numbers. However the Company did not verify the storage cycle volumes, MSQ numbers and all of the calculations that were shown in DOC Attachment 3 of the Department's *Comments*. Along with the Company's explanation above and in comparing their Attachment 5 to DOC Attachment 3

there are slight differences that can be attributable to rounding differences and as a result a revised DOC Attachment 3 is not necessary.

Given the Company's explanation above it is clear that this yearly Storage contracts vary in duration from June 1st to May 31st of the subsequent year, however the Company has not previously filed demand entitlement Petitions[1] with the Commission requesting the above changes that are effective in June as required by Minn. R. 7825.2910, subp. 2, but has included the contract numbers in its annual November 1st demand entitlement Petitions.[2] The Department appreciates that MERC recently filed petitions regarding the storage capacity contracts. The Department is providing comments in those dockets concurrent with the instant comments.

As a result, from a forward-looking manner the Department is confident that the Company will adhere to Minn. R. 7825.2910, subp. 2.

E. DEPARTMENT RESPONSE REGARDING MERC-NMU'S PGA SYSTEM'S VIKING CAPACITY AND THE BALANCING AGREEMENT CONTRACT ML0021

In the Department's NMU PGA system demand entitlement *Comments*, the DOC sought clarification and additional information on the decrease in Viking capacity by stating the following:

> As mentioned above, the DOC notes that MERC-NMU is decreasing its VGT capacity by approximately 2,393 Dkt as a

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[1] The Company recently filed on May 31st, 2012, Demand Entitlement Petitions in Docket Nos. G011/M-12-558 and G007/M-12-559 related to its acquisition of additional storage from LS Power.

[2] Minn. R. 7825.2910, Subp. 2, states the following:

> **Subp. 2.**
>
> **Filing upon change in demand.**
>
> Gas utilities shall file for a change in demand to increase or decrease demand, to redistribute demand percentages among classes, or to exchange one form of demand for another. A filing must contain:
>
> **A.** a description of the factors contributing to the need for changing demand;
>
> **B.** the utility's design-day demand by customer class and the change in design-day demand, if any, necessitating the demand revision;
>
> **C.** a summary of the levels of winter versus summer usage for all customer classes; and
>
> **D.** a description of design-day gas supply from all sources under the new level, allocation, or form of demand.

> result of terminating its Wadena Option and acquiring newer capacity in Viking FT-A contracts AF0014, AF0102, and AF0183.
>
> The Company also listed a balancing agreement of 4,607 units under contract ML0021. This swap has the effect of increasing the VGT capacity costs. The Department does not oppose MERC's proposal at this time. However, in order to ensure the validity of MERC's decision to acquire the newer capacity, the Department seeks clarification and requests MERC to provide additional information including, but not limited to, the following:
>
> - Details on the balancing agreement contract ML0021 and explanations on why only the firm customers are paying for this service; and
>
> - A comparable cost/benefit analysis to the Wadena Call Option assuming that winter capacity may be available on VGT.
>
> The Department will provide its conclusions regarding the Company's proposed recovery of overall demand costs after reviewing the Company's *Reply Comments* as discussed in further detail below.

The Company in its *Reply Comments* stated the following:

> Regarding balancing agreement contract ML0021, this is a balancing service covered under Viking Gas Transmission LMS Rate Schedule. The service allows MERC to balance with the pipeline on a daily basis in excess of a 5% tolerance up to 7,465 Dth/day. The volumes in excess of 5% up to 7,465 Dth/day are charged the LMS Daily Overrun rate of $.1737. MERC balances all customers behind their system, whether firm, interruptible or transportation. At the end of the month, all transportation customers are cashed out for the difference between nominations and actual consumption. ML0021 has historically been charged to firm customers through the Demand Entitlement filing. MERC would need to remove from the demand costs and move to commodity costs, similar to what the Department as recommended MERC to do with storage.

The above-mentioned service is a Load Management Service (LMS) on Viking, which is similar to NNG's System Management Services (SMS) that allow a shipper to balance with the pipeline on a daily basis in excess of typically a 5 percent tolerance level. These services are typically used for all customers throughout the year.

The Department also references its *Response Comments* dated November 15, 2011, in Docket No. G011/M-10-1168, G007/M-10-1166 and G011/M-10-1167 wherein the following was stated on page 6:

> The Company also provides additional discussion regarding the high reserve margins on its Northern, NMU, and Great Lakes PGA systems. In this discussion, MERC reiterates its concerns regarding slow economic growth and lack of actual non-firm data. The Company also discusses its responsibility in terms of balancing the overall MERC system. In particular, the Company states that it does not contract for firm capacity to meet non-firm usage, but it still has the responsibility to balance the entire system with respect to each interstate pipeline. The Company must deliver enough gas to ensure service for firm, non-firm, and any third-party transportation volumes in excess of third party delivered supply.

As mentioned by MERC above, transportation customers are cashed out while the balancing costs are only allocated to firm customers even though all firm and non-firm customers are balanced behind MERC's system. In addition, the Commission has approved a proposal by other regulated gas utilities, including Great Plains Natural Gas Company, to allocate its storage and balancing costs to all sales customers effective November 1, 2010. Please see the Commission's *September 30, 2010 Order Accepting Demand Entitlement Filings, Requiring Consultation, and Requiring Other Action*. In general, all sales customers benefit from storage and balancing services and thus when storage and balancing costs are allocated to all sales customers the same customers, in general, pay for the services that they receive. Also, when interruptible or non-firm customers are curtailed they would not pay for the storage and balancing services on those days.

Based on all of the above, the Department recommends that the Commission order MERC to remove all balancing costs such as (SMS, LMS, Union Balancing etc) from demand costs and move them to commodity costs in its September 1, 2012 monthly PGA filings to coincide with the *Annual Automatic Adjustment (AAA) Report and True-up filing* due on September 1, 2012 thus ensuring that all sales customers who benefit from these services pay for the associated costs.

III. THE DEPARTMENT'S CONCLUSIONS AND RECOMMENDATIONS

Based on its review of MERC's *Reply Comments*, the Department recommends that the Commission:

- approve MERC-NMU's PGA system demand entitlement levels;
- approve the PGA recovery of costs associated with MERC-NMU's proposed demand entitlement levels effective November 1, 2011 with the modification that MERC recover costs associated with Storage and the Bison contract through the commodity portion of the monthly PGA;
- approve MERC-PNG's Northern PGA system demand entitlement levels;
- approve the PGA recovery of costs associated with MERC-PNG's Northern PGA system proposed demand entitlement levels effective November 1, 2011 with the modification that MERC recover costs associated with Storage and the Bison contract through the commodity portion of the monthly PGA; and
- Order MERC to remove all balancing costs such as (SMS, LMS, Union Balancing etc) from demand costs and move them to commodity costs in its September 1, 2012 monthly PGA filings to coincide with the *Annual Automatic Adjustment (AAA) Report and True-up filing* due on September 1, 2012 costs thus ensuring that all sales customers who benefit from these services pay for the associated costs.

The Department also expects and recommends that the Company on forward-looking basis adhere to Minn. R. 7825.2910, subp. 2.

/ja

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Response Comments

Docket No. G011/M-11-1083, G011/M-11-1084, and G007/M-11-1088

Dated this **1st of August, 2012**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_11-1083_11-1083
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	OFF_SL_11-1083_11-1083
Michael	Bradley	bradleym@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	OFF_SL_11-1083_11-1083
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_11-1083_11-1083
Daryll	Fuentes	N/A	USG	550 W. Adams Street Chicago, IL 60661	Paper Service	No	OFF_SL_11-1083_11-1083
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_11-1083_11-1083
Richard	Haubensak	RICHARD.HAUBENSAK@CONSTELLATION.COM	Constellation New Energy Gas	Suite 200 12120 Port Grace Boulevard La Vista, NE 68128	Paper Service	No	OFF_SL_11-1083_11-1083
Jack	Kegel		MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Paper Service	No	OFF_SL_11-1083_11-1083
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_11-1083_11-1083
Brian	Meloy	brian.meloy@leonard.com	Leonard, Street & Deinard	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_11-1083_11-1083

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	apm@mcmlaw.com	Mackall, Crounse and Moore	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 55402	Paper Service	No	OFF_SL_11-1083_11-1083
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_11-1083_11-1083
Gregory	Walters	gjwalters@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	3460 Technology Dr. NW Rochester, MN 55901	Paper Service	No	OFF_SL_11-1083_11-1083

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_11-1084_AA-1084
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	OFF_SL_11-1084_AA-1084
Michael	Bradley	bradleym@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	OFF_SL_11-1084_AA-1084
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_11-1084_AA-1084
Daryll	Fuentes	N/A	USG	550 W. Adams Street Chicago, IL 60661	Paper Service	No	OFF_SL_11-1084_AA-1084
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_11-1084_AA-1084
Richard	Haubensak	RICHARD.HAUBENSAK@CONSTELLATION.COM	Constellation New Energy Gas	Suite 200 12120 Port Grace Boulevard La Vista, NE 68128	Paper Service	No	OFF_SL_11-1084_AA-1084
Jack	Kegel		MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Paper Service	No	OFF_SL_11-1084_AA-1084
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_11-1084_AA-1084
Brian	Meloy	brian.meloy@leonard.com	Leonard, Street & Deinard	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_11-1084_AA-1084

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Andrew	Moratzka	apm@mcmlaw.com	Mackall, Crounse and Moore	1400 AT&T Tower 901 Marquette Ave Minneapolis, MN 55402	Paper Service	No	OFF_SL_11-1084_AA-1084
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_11-1084_AA-1084
Gregory	Walters	gjwalters@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	3460 Technology Dr. NW Rochester, MN 55901	Paper Service	No	OFF_SL_11-1084_AA-1084

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Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_11-1088_11-1088
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	OFF_SL_11-1088_11-1088
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Daryll	Fuentes	N/A	USG	550 W. Adams Street Chicago, IL 60661	Paper Service	No	OFF_SL_11-1088_11-1088
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_11-1088_11-1088
Richard	Haubensak	RICHARD.HAUBENSAK@CONSTELLATION.COM	Constellation New Energy Gas	Suite 200 12120 Port Grace Boulevard La Vista, NE 68128	Paper Service	No	OFF_SL_11-1088_11-1088
Jack	Kegel		MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Paper Service	No	OFF_SL_11-1088_11-1088
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