



414 Nicollet Mall  
Minneapolis, MN 55401

July 28, 2014

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

**—Via Electronic Filing—**

Re: REPLY COMMENTS  
2014/2015 NATURAL GAS CIP ADJUSTMENT FACTOR  
DOCKET NO. G002/M-14-288

Dear Dr. Haar:

Northern States Power Company, doing business as Xcel Energy, submits to the Minnesota Public Utilities Commission this brief Reply to the Comments of the Minnesota Department of Commerce, Division of Energy Resources on our Petition for approval of a natural gas Conservation Improvement Program (CIP) Adjustment Factor.

**REPLY**

We appreciate and agree with the Department's recommendation to approve the 2013 gas CIP Tracker activity as filed and CIP financial incentive of \$5,416,936 for our 2013 DSM performance. Below we provide additional responses regarding carrying charges to the CIP Tracker monthly balance and the gas CIP Adjustment Factor.

**A. Application of Carrying Charges to CIP Tracker**

In their Comments, the Department recommends the Commission eliminate carrying charges on under-or over-recovered CIP balances beginning with the month after the Commission issues its Order in this docket. In the event that the Commission decides to not eliminate carrying charges on the entire CIP balance, the Department recommends that the Commission disallow carrying charges on the CIP financial incentive. We respectfully disagree with the Department's proposal.

Carrying charges serve the purpose of keeping our customers and the Company whole for mismatches in cost recovery over discrete periods of time. The use of carrying charges goes both ways and should be continued.

We calculate our CIP Riders to recover CIP costs and incentives in a manner that produces a balance as close as possible to zero at the end of the recovery period to minimize carrying charges. As pointed out by the Department, this has resulted in historical total annual carrying charges that are relatively insignificant. In addition, there have been years where the Company has paid out more carrying charges to customers than collected.

Further, the application of the carrying charge is consistent with Commission precedent and policy. The continued application of carrying charges was recently approved along with MN Power's CIP 2014/2015 Conservation Program Adjustment (CPA) factor and in Docket No. E015/M-14-233. A broad-based change in Commission policy should not be made in the context of an individual utility's annual filing, and should not be applied inconsistently between utilities.

For these reasons, we believe it is still appropriate to apply carrying charges to the CIP tracker balance and respectfully request the Commission continue to allow the application of carrying charges at this time.

## **B. 2014/2015 Gas CIP Adjustment Factor**

Given the current uncertainty of what the Commission's decision will be regarding the future application of carrying charges, we provide as Attachments A and B, two different updates of the 2014/2015 gas CIP Adjustment Factor. Each update incorporates a different carrying charge scenario:

- Attachment A: carrying charges applied to monthly balance (business as usual)
- Attachment B: complete removal of all carrying charges beginning the month after the Commission's Decision

The third potential scenario proposed by the Department, which consists of disallowing carrying charges only on the CIP financial incentive, would result in significant changes to our internal accounting practices, rider calculation methodology, and CIP trackers. With the number of outstanding questions the Company has regarding how this would be handled, we are waiting to calculate any such rider at this time.

With each scenario, we recalculated the rider using actual tracker activity through June 2014 and updated sales forecasts that have become available since our initial filing. As with previous years, we calculated each rider to reduce the Tracker to approximately \$0 by the end of September 2015. Below are the revised CIP Adjustment Factors and projected end-of-month balance for September 2015 related to each scenario.

- Attachment A: \$0.13818 per Dth and \$310 balance
- Attachment B: \$0.14273 per Dth and \$458 balance

As stated above, we request the Commission continue to allow the application of carrying charges and therefore, respectfully request approval of **\$0.13818 per Dth CIP Rider** as calculated in Attachment A.

## CONCLUSION

We thank the Department for their thorough review of our Petition. Upon receiving the Commission Order, we agree to file a compliance filing within 10 days of the issue date of the Order which will include any necessary calculations, updated tariff sheets, and an updated bill message referencing the approved rate and effective date.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the attached service list.

Please contact Kelsey Genung at [kelsey.genung@xcelenergy.com](mailto:kelsey.genung@xcelenergy.com) or 612-337-2328 or me at [shawn.m.white@xcelenergy.com](mailto:shawn.m.white@xcelenergy.com) or 612-330-6096 if you have any questions regarding this filing.

Sincerely,

/s/

SHAWN WHITE  
MANAGER  
DSM REGULATORY STRATEGY AND PLANNING

Enclosures  
c: Service List

**Northern States Power Company  
a Minnesota corporation  
2014-2015 CIP Adjustment Factor Calculation**

The CIP Adjustment Factor, or Conservation Cost Recovery Adjustment (CCRA), calculation has been updated using actual data through June 2014. The calculation assumes Commission approval in September 2014 with a CCRA effective date of October 1, 2014. We have calculated the CCRA to achieve a near \$0 balance by September 30, 2015.

As in the past, Xcel Energy will include a message referencing the change in the CIP Adjustment Factor in customers' bills. In the event that Commission approval of the proposed adjustment is delayed beyond September 21, 2014 (in order to implement the rate change by October 1), the Company will continue to apply the current CIP Adjustment of \$0.19529 per Dth up to the first cycle of the first full billing period following Commission approval of a revised factor.

**Calculation of Revised Gas CIP Adjustment Factor**

Forecasted beginning balance (Oct 2014)	(\$4,144,558)
Approved expenditures (Oct 2014 - Sept 2015)	\$14,031,665
Forecasted 2014 incentive	\$3,612,523
Less forecasted CCRC recovery (Oct 2014-Sept 2015)	\$3,625,053
Forecasted Sept 30, 2015 balance	\$9,874,577

(1) Forecasted September 30, 2015 Gas CIP Tracker Balance	9,874,577
(2) Forecasted Gas Sales in Dth (Oct 2014 - Sept 2015)	69,180,403
(3) Recalculated Gas CIP Adjustment Rate = (1) / (2)	\$0.14273

The above calculated balance does not include carrying charges. To include carrying charges, we used the CIP Trackers to calculate the optimal rate of **\$0.13818 per Dth**, which results in a \$310 end-of-month balance for September 2015. This is the positive balance closest to zero that we can model, given the digit limitations in our billing system. The updated 2014 and 2015 Gas CIP Trackers are shown below.

## 2014 Gas CIP Tracker Forecast

Actual and Forecasted 2014 CIP Tracker balance.

## 2015 Gas CIP Tracker Forecast

Forecasted 2015 CIP Tracker balance, assuming we receive cost recovery at the proposed Adjustment Factor.

Northern States Power Company, a Minnesota corporation State of Minnesota Gas Utility DSM Cost Recovery and Incentive Mechanism Tracker and Balance (\$)										
2015 Forecast										
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sent	
EXPENSES										
1. Balance	(\$3,717,857)	(\$5,452,835)	(\$6,145,087)	(\$6,611,801)	(\$6,350,348)	(\$6,194,338)	(\$5,568,772)	(\$4,859,988)		(\$4,320,423)
2. CIP Program Expenditures	622,987	1,303,026	1,177,757	1,272,868	810,546	1,060,469	1,068,816	924,452		1,105,980
3. 2014 Performance Incentive										3,612,523
4. Total Expenses (Line 1 + 2 + 3)	(3,094,870)	(4,149,809)	(4,967,330)	(5,398,933)	(5,539,802)	(5,133,869)	(4,499,956)	(3,935,336)		398,080
RECOVERY										
5. CCRC Rate (\$/Dth)	0.0524	0.0524	0.0524	0.0524	0.0524	0.0524	0.0524	0.0524		0.0524
6. CCRC Cost Recovery	640,015	539,240	442,074	268,413	170,527	111,092	91,586	59,242		109,367
7. CIP Adjustment Factor Rate (\$/Dth)	0.13818	0.13818	0.13818	0.13818	0.13818	0.13818	0.13818	0.13818		0.13818
8. CIP Adjustment Factor Recovery	1,687,734	1,421,987	1,165,759	707,812	449,684	292,953	241,515	261,704		288,404
9. Total Recovery (Line 6 + 8)	2327749	1961227	1607833	976225	620212	404045	333102	360946		397772
10. Rate Refund	0	0	0	0	0	0	0	0		0
11. Sub-Balance (Line 4-9)	(5,422,619)	(6,111,035)	(6,575,163)	(6,315,158)	(6,160,013)	(5,537,914)	(4,833,057)	(4,296,482)		309
12. Accum Deferred Tax (Line 11 * 41.37%)	(2,243,337)	(2,528,135)	(2,720,145)	(2,612,581)	(2,548,397)	(2,291,035)	(1,999,436)	(1,777,455)		128
13. Net Investment (Line 11-12)	(3,179,282)	(3,582,900)	(3,855,018)	(3,702,577)	(3,611,616)	(3,246,879)	(2,833,622)	(2,519,027)		181
14. Carrying Charge (a) (Line 13 * Carrying Charge Rate)	(30,216)	(34,052)	(36,638)	(35,189)	(34,325)	(30,858)	(26,931)	(23,941)		2
15. End of Month Balance (Line 11+14)	(5,452,835)	(6,145,087)	(6,611,801)	(6,350,348)	(6,194,338)	(5,568,772)	(4,859,988)	(4,320,423)		310

**Northern States Power Company  
a Minnesota corporation  
2014-2015 CIP Adjustment Factor Calculation**

The CIP Adjustment Factor, or Conservation Cost Recovery Adjustment (CCRA), calculation has been updated using actual data through June 2014. The calculation assumes Commission approval in September 2014 with a CCRA effective date of October 1, 2014. It also assumed the disallowance of the application of carrying charges beginning October 1, 2014. We have calculated the CCRA to achieve a near \$0 balance by September 30, 2015.

As in the past, Xcel Energy will include a message referencing the change in the CIP Adjustment Factor in customers' bills. In the event that Commission approval of the proposed adjustment is delayed beyond September 21, 2014 (in order to implement the rate change by October 1), the Company will continue to apply the current CIP Adjustment of \$0.19529 per Dth up to the first cycle of the first full billing period following Commission approval of a revised factor.

**Calculation of Revised Gas CIP Adjustment Factor**

Forecasted beginning balance (Oct 2014)	(\$4,144,558)
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Forecasted 2014 incentive	\$3,612,523
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(3) Recalculated Gas CIP Adjustment Rate = (1) / (2)	\$0.14273

The above calculated balance does not include carrying charges. As shown in the updated 2014 and 2015 Gas CIP Trackers provided below, the rate of **\$0.14273 per Dth** results in an end-of-month balance for September 2015 of \$458. This is the positive balance closest to zero that we can model, given the digit limitations in our billing system.

## 2014 Gas CIP Tracker Forecast

Actual and Forecasted 2014 CIP Tracker balance.

Northern States Power Company, a Minnesota corporation State of Minnesota - Gas Utility DSM Cost Recovery and Incentive Mechanism Tracker and Balance (\$)										
2014 Actual and Forecast										
<u>EXPENSES</u>	Jan Actual	Feb Actual	Mar Actual	Apr Actual	May Actual	Jun Actual	Jul Forecast	Aug Forecast	Sep Forecast	Oct Forecast
1. Balance	(\$4,680,426)	(\$7,507,722)	(\$8,932,545)	(\$10,554,577)	(\$11,443,003)	(\$11,358,381)	(\$11,107,551)	(\$10,531,959)	(\$10,121,446)	(\$4,144,558)
2. CIP Program Expenditures	700,904	1,790,836	989,913	776,179	1,103,960	852,775	1,070,056	925,525	1,107,263	1,242,834
3. 2013 Performance Incentive										
4. <b>Total Expenses</b> <small>(Line 1+2+3)</small>	<b>(3,979,522)</b>	<b>(5,716,887)</b>	<b>(7,932,532)</b>	<b>(9,808,398)</b>	<b>(10,339,044)</b>	<b>(10,446,207)</b>	<b>(10,037,495)</b>	<b>(9,606,434)</b>	<b>(9,603,247)</b>	<b>(2,464,265)</b>
<b>RECOVERY</b>										
5. CCR Rate (\$/Dth)	0.0524	0.0524	0.0524	0.0524	0.0524	0.0524	0.0524	0.0524	0.0524	0.0524
6. CCR Cost Recovery	737,806	667,712	548,523	332,394	210,872	126,889	82,280	99,350	109,658	202,208
7. CIP Adjustment Factor Rate (\$/Dth)	0.19828	0.19629	0.19528	0.19528	0.19528	0.19528	0.19529	0.19529	0.19529	0.19529
8. CIP Adjustment Factor Recovery	2,748,982	2,488,503	2,044,668	1,238,802	785,900	472,905	343,843	368,542	408,687	550,787
9. <b>Total Recovery</b> <small>(Line 6 + 8)</small>	<b>3,486,588</b>	<b>3,156,216</b>	<b>2,593,283</b>	<b>1,571,196</b>	<b>986,772</b>	<b>599,794</b>	<b>438,103</b>	<b>464,893</b>	<b>518,345</b>	<b>752,995</b>
10. Rate Refund	0	0	0	0	0	0	0	0	0	0
11. Sub-Balance <small>(Line 4-9)</small>	(7,466,120)	(8,873,102)	(10,525,924)	(11,379,594)	(11,355,816)	(11,046,001)	(10,473,598)	(10,071,326)	(4,121,592)	(3,654,720)
12. Accrued Deferred Tax <small>(Line 11 * 41.37%)</small>	(3,088,734)	(3,670,802)	(4,354,575)	(4,707,738)	(4,689,627)	(4,569,730)	(4,332,927)	(4,166,508)	(1,705,103)	(1,511,956)
13. Net Investment <small>(Line 11-12)</small>	(4,377,386)	(5,202,300)	(6,171,348)	(6,671,856)	(6,646,189)	(6,476,270)	(6,140,670)	(5,904,819)	(2,416,489)	(2,142,782)
14. Carrying Charge (a) <small>(Line 13 * Carrying Charge Rate)</small>	(41,903)	(49,443)	(58,953)	(63,409)	(63,165)	(61,550)	(58,361)	(56,119)	(22,986)	(475,270)
15. <b>End of Month Balance</b> <small>(Line 11+4)</small>	<b>(7,507,722)</b>	<b>(8,922,545)</b>	<b>(10,654,577)</b>	<b>(11,443,003)</b>	<b>(11,398,981)</b>	<b>(11,107,551)</b>	<b>(10,531,989)</b>	<b>(10,127,446)</b>	<b>(4,144,558)</b>	<b>(3,654,720)</b>
										<b>(3,962,296)</b>
										<b>(3,755,247)</b>
										<b>(4,077,862)</b>
										<b>(554,379)</b>
										<b>(1,427,73)</b>
										<b>(1,510,048)</b>
										<b>(18,118,662)</b>

## 2015 Gas CIP Tracker Forecast

Forecasted 2015 CIP Tracker balance, assuming we receive cost recovery at the proposed Adjustment Factor.

<b>Northern States Power Company, a Minnesota corporation State of Minnesota - Gas Utility DSIR Cost Recovery and Incentive Mechanism Tracker and Balance (\$) 2015 Forecast</b>										
	<u>Jan</u>	<u>Feb</u>	<u>Mar</u>	<u>Apr</u>	<u>May</u>	<u>Jun</u>	<u>Jul</u>	<u>Aug</u>	<u>Sep</u>	<u></u>
<b>EXPENSES</b>										
1. Balance	(\$3,755,247)	(\$5,515,583)	(\$6,220,607)	(\$6,689,068)	(\$6,415,733)	(\$6,240,205)	(\$5,593,427)	(\$4,865,665)	(\$4,310,777)	
2. CIP Program Expenditures	622,987	1,303,026	1,177,757	1,272,868	810,546	1,060,469	1,068,816	924,452	1,105,980	
3. 2014 Performance Incentive										3,612,523
<b>4. Total Expenses (Line 1 + 2 + 3)</b>	<b>(3,132,260)</b>	<b>(4,212,557)</b>	<b>(5,042,849)</b>	<b>(5,416,200)</b>	<b>(5,605,187)</b>	<b>(5,179,736)</b>	<b>(4,524,611)</b>	<b>(3,941,214)</b>	<b>407,726</b>	
<b>RECOVERY</b>										
5. CCRC Rate (\$/Dth)	0.0524	0.0524	0.0524	0.0524	0.0524	0.0524	0.0524	0.0524	0.0524	
6. CCRC Cost Recovery	640,015	539,240	442,074	268,413	170,527	111,092	91,586	99,242	109,367	
7. CIP Adjustment Factor Rate (\$/Dth)	0.14273	0.14273	0.14273	0.14273	0.14273	0.14273	0.14273	0.14273	0.14273	
8. CIP Adjustment Factor Recovery	1,743,308	1,468,810	1,204,145	731,119	64,492	302,599	249,488	270,321	297,901	
<b>9. Total Recovery (Line 6 + 8)</b>	<b>2,383,323</b>	<b>2,008,050</b>	<b>1,646,219</b>	<b>999,532</b>	<b>63,5019</b>	<b>41,3691</b>	<b>34,1054</b>	<b>36,9563</b>	<b>407,268</b>	
10. Rate Refund	0	0	0	0	0	0	0	0	0	
11. Sub-Balance (Line 4-9)	(5,515,583)	(6,220,607)	(6,689,068)	(6,415,733)	(6,240,205)	(5,593,427)	(4,865,665)	(4,310,777)	458	
12. Accum Deferred Tax (Line 11 * 41.37%)	(2,281,797)	(2,573,465)	(2,767,268)	(2,654,189)	(2,581,573)	(2,314,001)	(2,012,926)	(1,783,368)	190	
13. Net Investment (Line 11-12)	(3,233,786)	(3,647,142)	(3,921,801)	(3,761,544)	(3,658,632)	(3,279,427)	(2,852,740)	(2,527,408)	269	
14. Carrying Charge (a) (Line 13 * Carrying Charge Rate)										
<b>15. End of Month Balance</b>	<b>(5,515,583)</b>	<b>(6,220,607)</b>	<b>(6,689,068)</b>	<b>(6,415,733)</b>	<b>(6,240,205)</b>	<b>(5,593,427)</b>	<b>(4,865,665)</b>	<b>(4,310,777)</b>	<b>458</b>	

## CERTIFICATE OF SERVICE

I, SaGonna Thompson, hereby certify that I have this day served copies of the foregoing document on the attached list of persons.

- xx by depositing a true and correct copy thereof, properly enveloped with postage paid in the United States mail at Minneapolis, Minnesota; or
- xx by electronic filing.

**Docket No.: G002/M-14-288**

Dated this 28<sup>th</sup> day of July 2014.

/s/

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SaGonna Thompson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
George	Agriesti	gagriesti@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_14-288_M-14-288
Julie Rae	Ambach	jambach@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	OFF_SL_14-288_M-14-288
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_14-288_M-14-288
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_14-288_M-14-288
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Gary	Connett	gconnett@grenergy.com	Great River Energy	12300 Elm Creek Blvd N Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_14-288_M-14-288
George	Crocker	gwllc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_14-288_M-14-288
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Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-288_M-14-288

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400  Plymouth, MN 554475142	Electronic Service	No	OFF_SL_14-288_M-14-288
Chris	Duffrin	chrisd@thenec.org	Neighborhood Energy Connection	624 Selby Avenue  St. Paul, MN 55104	Electronic Service	No	OFF_SL_14-288_M-14-288
Jim	Erchul		Daytons Bluff Neighborhood Housing Sv.	823 E 7th St  St. Paul, MN 55106	Paper Service	No	OFF_SL_14-288_M-14-288
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl  Northfield, MN 55057	Electronic Service	No	OFF_SL_14-288_M-14-288
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_14-288_M-14-288
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_14-288_M-14-288
Kelsey	Genung	kelsey.genung@xcelenergy.com	Xcel Energy	414 Nicollet Mall, Fl. 6  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-288_M-14-288
Angela E.	Gordon	angela.e.gordon@lmco.com	Lockheed Martin	1000 Clark Ave.  St. Louis, MO 63102	Electronic Service	No	OFF_SL_14-288_M-14-288
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	OFF_SL_14-288_M-14-288

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_14-288_M-14-288
Stephan	Gunn	sgunn@appliedenergygroup.com	Applied Energy Group	1941 Pike Ln  De Pere, WI 54115	Electronic Service	No	OFF_SL_14-288_M-14-288
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_14-288_M-14-288
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_14-288_M-14-288
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE  Rochester, MN 55906	Electronic Service	No	OFF_SL_14-288_M-14-288
Norm	Harold	N/A	NKS Consulting	5591 E 180th St  Prior Lake, MN 55372	Paper Service	No	OFF_SL_14-288_M-14-288
Jared	Hendricks	hendricksj@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_14-288_M-14-288
Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 6th Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-288_M-14-288
Randy	Hoffman	rhoffman@eastriver.coop	East River Electric Power Coop	121 SE 1st St PO Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_14-288_M-14-288
Karolanne	Hoffman	kmh@dairynet.com	Dairyland Power Cooperative	PO Box 817  La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_14-288_M-14-288

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sandra	Hofstetter	N/A	MN Chamber of Commerce	7261 County Road H  Fremont, WI 54940-9317	Paper Service	No	OFF_SL_14-288_M-14-288
Tom	Holt	tholt@eastriver.coop	East River Electric Power Coop., Inc.	PO Box 227  Madison, SD 57042	Electronic Service	No	OFF_SL_14-288_M-14-288
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue  St. Paul, MN 55130	Electronic Service	No	OFF_SL_14-288_M-14-288
Michael	Hoy	mhoy@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_14-288_M-14-288
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of Saint Paul	390 City Hall 15 West Kellogg Boulevard  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_14-288_M-14-288
Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	OFF_SL_14-288_M-14-288
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	90 South 7th Street Suite #4800 Minneapolis, MN 554024129	Electronic Service	No	OFF_SL_14-288_M-14-288
Dave	Johnson	N/A	Community Action of Minneapolis	2104 Park Ave S  Minneapolis, MN 55404	Paper Service	No	OFF_SL_14-288_M-14-288
Paula	Johnson	paulajohnson@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_14-288_M-14-288
Joel	Johnson	joel@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_14-288_M-14-288

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_14-288_M-14-288
Larry	Johnston	lw.johnston@smmpa.org	SMMPA	500 1st Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_14-288_M-14-288
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_14-288_M-14-288
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-288_M-14-288
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE Austin, MN 55912	Electronic Service	No	OFF_SL_14-288_M-14-288
Martin	Lepak	N/A	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Paper Service	No	OFF_SL_14-288_M-14-288
Allan	Lian	alian@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_14-288_M-14-288
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_14-288_M-14-288
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-288_M-14-288
Pam	Marshall	pam@energcents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_14-288_M-14-288

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John	McWilliams	jmm@dairynet.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817  La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_14-288_M-14-288
Brian	Meloy	brian.meloy@stinsonleonard.com	Stinson,Leonard, Street LLP	150 S 5th St Ste 2300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-288_M-14-288
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_14-288_M-14-288
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-288_M-14-288
Gary	Myers	garym@hpuc.com	Hibbing Public Utilities	1902 E 6th Ave  Hibbing, MN 55746	Electronic Service	No	OFF_SL_14-288_M-14-288
Susan K	Nathan	snathan@appliedenergygroup.com	Applied Energy Group	2215 NE 107th Ter  Kansas City, MO 64155-8513	Electronic Service	No	OFF_SL_14-288_M-14-288
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-288_M-14-288
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-288_M-14-288
Gary	Olson		Product Recovery, Inc.	2605 E Cliff Rd  Burnsville, MN 55337	Paper Service	No	OFF_SL_14-288_M-14-288

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Kim	Pederson	kpederson@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-288_M-14-288
Audrey	Peer	audrey.peer@centerpointenergy.com	CenterPoint Energy	800 Lasalle Avenue - 14th Floor  Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_14-288_M-14-288
Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	OFF_SL_14-288_M-14-288
Bill	Popert		Technology North	2433 Highwood Ave  St. Paul, MN 55119	Paper Service	No	OFF_SL_14-288_M-14-288
Cindy	Schweitzer Rott	cindy.schweitzer@clearesult.com	CLEARResult's	S12637A Merrilee Rd.  Spring Green, WI 53588	Electronic Service	No	OFF_SL_14-288_M-14-288
Tom	Smilanich		Passive Concepts	228 6th Ave N  South St. Paul, MN 55075	Paper Service	No	OFF_SL_14-288_M-14-288
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_14-288_M-14-288
Leo	Steidel	N/A	The Weidt Group	5800 Baker Rd  Minnetonka, MN 55345	Paper Service	No	OFF_SL_14-288_M-14-288
John	Steinhoff		Resource Solutions, Inc.	318 Kensington Drive  Madison, WI 53704	Paper Service	No	OFF_SL_14-288_M-14-288
Richard	Szydlowski	rszydlowski@mncee.org	Center for Energy & Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401-1459	Electronic Service	No	OFF_SL_14-288_M-14-288

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kari L	Valley	kari.l.valley@xcelenergy.com	Xcel Energy Service Inc.	414 Nicollet Mall FL 5 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-288_M-14-288
Lisa	Wilson	lisa.wilson@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_14-288_M-14-288
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_14-288_M-14-288

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George	Agriesti	gagriesti@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Gary	Connett	gconnett@grenergy.com	Great River Energy	12300 Elm Creek Blvd N  Maple Grove, MN 553694718	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
George	Crocker	gwllc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Chris	Duffrin	chrisd@thenec.org	Neighborhood Energy Connection	624 Selby Avenue  St. Paul, MN 55104	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Michael	Hoy	mhoy@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024-9583	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

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Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of Saint Paul	390 City Hall 15 West Kellogg Boulevard  Saint Paul, MN 55102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Dave	Johnson	N/A	Community Action of Minneapolis	2104 Park Ave S  Minneapolis, MN 55404	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Joel	Johnson	joel@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Paula	Johnson	paulajohnson@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S  Virginia, MN 55792	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Larry	Johnston	lw.johnston@smpma.org	SMMPA	500 1st Ave SW  Rochester, MN 55902-3303	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE  Austin, MN 55912	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

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Martin	Lepak	N/A	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Allan	Lian	alian@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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	SPL_SL_CIP SPECIAL SERVICE LIST
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Pam	Marshall	pam@energcents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
John	McWilliams	jmm@dairynet.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817  La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Brian	Meloy	brian.meloy@stinsonleonard.com	Stinson,Leonard, Street LLP	150 S 5th St Ste 2300  Minneapolis, MN 55402	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

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Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Gary	Olson		Product Recovery, Inc.	2605 E Cliff Rd Burnsville, MN 55337	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Kim	Pederson	kpederson@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Bill	Popert		Technology North	2433 Highwood Ave St. Paul, MN 55119	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Cindy	Schweitzer Rott	cindy.schweitzer@clearesult.com	CLEAResult's	S12637A Merrilee Rd. Spring Green, WI 53588	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Tom	Smilanich		Passive Concepts	228 6th Ave N South St. Paul, MN 55075	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

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Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Leo	Steidel	N/A	The Weidt Group	5800 Baker Rd Minnetonka, MN 55345	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
John	Steinhoff		Resource Solutions, Inc.	318 Kensington Drive Madison, WI 53704	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Richard	Szydłowski	rszydłowski@mncee.org	Center for Energy & Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401-1459	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Steve	Tomac	stomac@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Lisa	Wilson	lisa.wilson@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST