

April 17, 2018

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket Nos. G002/M-18-241, G004/M-18-248, G008/M-18-235, G011/M-18-243,  
G022/M-18-249

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) regarding the gas affordability program annual reports filed in the above-referenced dockets.

The Department recommends that the Minnesota Public Utilities Commission (Commission) accept the annual reports, and is available to respond to any questions the Commission may have.

Sincerely,

/s/ STEPHEN COLLINS  
Rates Analyst

SC/lt  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. G002/M-18-241, G004/M-18-248, G008/M-18-235, G011/M-18-243, G022/M-18-249

#### I. INTRODUCTION

Every year at the end of March or beginning of April, each utility in Minnesota with a gas affordability program (GAP) must submit a report providing information on how its GAP fared over the prior year.<sup>1</sup> This year, the five utilities with a GAP submitted their annual reports in the following dockets:

- G002/M-18-241, for Xcel Energy (Xcel);
- G004/M-18-248, for Great Plains Natural Gas Company (Great Plains);
- G008/M-18-235, for CenterPoint Energy (CenterPoint);
- G011/M-18-243, for Minnesota Energy Resources Corporation (MERC); and
- G022/M-18-249, for Greater Minnesota Gas (GMG).

The Minnesota Department of Commerce, Division of Energy Resources (Department) analyzes whether the reports comply with all applicable reporting requirements and hence whether the Minnesota Public Utilities Commission (Commission) should accept the reports. A list of all reporting requirements is provided as Attachment No. 1 to these comments.

#### II. DEPARTMENT ANALYSIS

##### A. SUMMARY SCHEDULE (ALL UTILITIES)

The Department concludes that all utilities have provided the required summary schedule information. The Department shows the provided information in the table on the following page.

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<sup>1</sup> Annual reports enable the Commission to monitor utility GAPs in the years between multi-year GAP Evaluation Reports.

**Table 1: Summary Schedule Information for 2017**

Item	CenterPoint	GMG	Great Plains	MERC	Xcel
Average annual affordability benefit received per customer	\$368	\$292	\$111	\$409	\$205
Average annual arrearage forgiveness benefit received per customer	\$132	\$14	\$32	\$11	\$32
% of LIHEAP customers that participated in GAP	29%	23%	4%	14%	44%
Disconnection Rates:					
(a) GAP customers	2%	0%	5%	2%	3%
(b) Non-GAP LIHEAP customers	8%	3%	12%	3%	7%
(c) Non-LIHEAP customers (all firm customers incl. C&I)	3%	<1%	3%	<1%	<1%
Number of GAP participants enrolled as of year-end	8,720	14	37	1,580	6,418
# of GAP participants enrolled and receiving benefits at some time during the year	10,665	22	57	1,607	10,114
Annual program budget	\$5,000,000	\$20,000	\$50,000	\$750,000	\$2,500,000
Actual program revenue	\$4,824,652	\$0	\$10,354	\$0	\$1,771,705
Actual program cost	\$3,717,996	\$9,236	\$8,027	\$707,095	\$658,482
Tracker balance as of year end	\$2,956,406	-\$28,708	\$16,904	-\$38,976	\$658,482
Surcharge (\$/therm)	\$0.00453	\$0.00000	\$0.01393	\$0.00000	\$0.00400 (Jan-May) \$0.00445 (Jun-Dec)

**B. PAYMENT FREQUENCY (ALL UTILITIES EXCEPT GMG)**

The Department concludes that all applicable utilities have provided the required payment frequency information. The Department summarizes the provided information in the tables on the following page.

**Table 2: Payment Frequency in 2017 - Dollars Paid ÷ Dollars Requested**

Customer Group	CenterPoint	Great Plains	MERC	Xcel
GAP customers	35%	Not provided	Not provided	55%
GAP customers before they were enrolled in GAP	27%	Not provided	Not provided	57%
LIHEAP customers or Non-GAP LIHEAP customers	39%	Not provided	Not provided	98%

**Table 3: Payment Frequency in 2017 - Number of Payments Made ÷ Number of Payments Requested**

Customer Group	CenterPoint	Great Plains	MERC	Xcel
GAP customers	32%	76%	Not provided	57%
GAP customers before they were enrolled in GAP	27%	43%	Not provided	54%
LIHEAP customers or Non-GAP LIHEAP customers	40%	44%	Not provided	92%

**Table 4: Payment Frequency in 2017 - Number of Payments Made**

Customer Group	CenterPoint	Great Plains	MERC	Xcel
GAP customers	Not provided	Not provided	4	Not provided
GAP customers before they were enrolled in GAP	Not provided	Not provided	3	Not provided
LIHEAP customers or Non-GAP LIHEAP customers	Not provided	Not provided	7	Not provided

**Table 5: Payment Frequency in 2017 - Change in Payment Frequency for GAP Participants not Previously Enrolled in GAP**

Customer Group	CenterPoint	Great Plains	MERC	Xcel
Improved	Not provided	48%	Not provided	Not provided
Stayed the Same	Not provided	22%	Not provided	Not provided
Worsened	Not provided	30%	Not provided	Not provided

**C. PAYMENT AMOUNTS (ALL UTILITIES EXCEPT GMG)**

The Department concludes that all applicable utilities have provided the required payment amount information. The Department summarizes the provided information in the tables below. Table 6 shows total credits, while Table 7 shows affordability credits and Table 8 shows versus arrearage credits.

**Table 6: Average Credits vs. Average Bill**

Item	CenterPoint	Great Plains	MERC	Xcel
Average annual affordability and arrearage credits received per GAP customer	\$500	\$93	\$672	\$161
Average annual bill per GAP customer	\$793	\$500	\$696	\$1,251
Average affordability and arrearage credits as % of average annual bill	63%	19%	97%	13%

**Table 7: Average Affordability Credit vs. Average Bill in 2017**

Item	CenterPoint	Great Plains	MERC	Xcel
Average annual affordability credits received per GAP customer	\$368	\$111	Not provided	\$145
Average annual bill per GAP customer	\$793	\$500	\$696	\$1,251
Average affordability credit as % of average annual bill	46%	22%	Not provided	12%

**Table 8: Average Arrearage Credit vs. Average Arrearage Balances in 2017**

Item	CenterPoint	Great Plains	MERC	Xcel
Average annual arrearage forgiveness credits received per GAP customer	\$132	\$32	Not provided	\$16
Average arrearage balance per GAP customer	\$427	\$103	-\$522 <sup>2</sup>	\$253
Average annual arrearage forgiveness credit as % of average arrearage balance	31%	31%	Not provided	6%

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<sup>2</sup> MERC explains the reason for the negative arrearage balance as follows: “the average arrearage (account balance) includes account balances for those customers who have participated in the Program for more than two years and who successfully eliminated their pre-Program arrears and may have a significant credit balance. Because MERC has had an increasing number of accounts in which the total credit balance exceeds the total arrears balance, the average account balance continues to be a growing negative number (i.e., credit).”

**D. ARREARS (ALL UTILITIES EXCEPT GMG)**

The Department concludes that all applicable utilities have provided the required arrears information. The Department summarizes the provided information in the table below.

**Table 9: Percent Change in Total Dollars of Arrears from 2016 to 2017**

Customer Group	CenterPoint	Great Plains	MERC	Xcel
GAP	-3%	-38%	+25%	+5%
Non-GAP LIHEAP	+19%	-12%	+10%	+13%
Residential	-7%	+18%	+40%	+26%

**E. RETENTION (ALL UTILITIES EXCEPT GMG)**

The Department concludes that all applicable utilities have provided the required retention information. The Department summarizes the provided information in the table below.

**Table 10: Retention in 2017**

CenterPoint	Great Plains	MERC	Xcel
~79% retention rate	65% retention rate	63 new customers, 109 removed, similar overall participation relative to 2016	62% retention rate

**F. COMPLAINTS (ALL UTILITIES EXCEPT GMG)**

The Department concludes that all applicable utilities have provided the required complaints information. The applicable utilities reported no customer complaints regarding GAP in 2017.

**G. COLLECTIONS (ALL UTILITIES EXCEPT GMG)**

The Department concludes that all applicable utilities have provided the required collections information. All applicable utilities concluded that GAP reduced the collections by increasing payments.

**H. COORDINATION (ALL UTILITIES EXCEPT GMG)**

The Department concludes that all applicable utilities have provided the required coordination information. The Department summarizes the provided information in the table on the following page.

**Table 11: Coordination Efforts in 2017**

CenterPoint	Great Plains	MERC	Xcel
Coordination with conservation programs, Hennepin County, other organizations	Several efforts with local community action/human service organizations on training and applications	Coordination among MERC Care Center, The Salvation Army, and variety of public-sector entities	Coordination among Energy Cents Coalition, Ramsey County, Washington County and Xcel programs

*I. CONSERVATION MEASURES (CENTERPOINT ONLY)*

The Department concludes that CenterPoint has provided the required conservation measures information. The Department summarizes the provided information in the table below.

**Table 12: CenterPoint’s Conservation Measures in 2017**

Item	Description
Potential no-, low- and mid-cost conservation measures that could be implemented in the households of GAP participants	Lowering thermostat and/or installing a programmable unit; lowering water heater setting; opening and closing drapes according to season and time of day; installing low-flow showerhead and faucet aerator; and window and door weather-stripping; home Energy audit; weatherization; furnace repair/replacement/tune-up; boiler repair/replacement/tune-up; and water heater replacement
Plans to encourage GAP participants to increase their use of these measures	Cross-promotion of programs with GAP

*J. CUSTOMER ELIGIBILITY (CENTERPOINT ONLY)*

The Department concludes that CenterPoint has provided the required customer eligibility information. For 2017, CenterPoint found that 1,664 customers applied for GAP but did not qualify for credits.

*K. PARTICIPATION RATE EVALUATION (GREAT PLAINS ONLY)*

The Department concludes that Great Plains has provided the required participation rate information. Great Plains indicated that the portion of customers qualifying for GAP decreased

relative to 2016 due to the cost of gas decreasing and warmer weather.<sup>3</sup> However, Great Plains found that the number of customers enrolled in GAP increased from 48 to 57, perhaps due to Great Plains' ongoing promotional efforts.

*L. COST EVALUATION (GREAT PLAINS ONLY)*

The Department concludes that Great Plains has provided the required cost evaluation information. Great Plains noted that the actual cost per participant qualifying for credits in 2017 was \$93, much less than the assumed average annual cost per participant of \$555 set out years ago. Great Plains indicated that the reason for the cost being lower than assumed is the lower cost of gas and warmer weather.

*M. OVERALL EVALUATION (GREAT PLAINS ONLY)*

The Department concludes that Great Plains has provided the required overall evaluation information. Great Plains stated that it is proactively working to qualify more applicants and that one way it is doing so is by designating energy assistance grants as customer payments. Great Plains concluded that this change results in less customers being removed from the program for failing to make required payments. Great Plains also indicated that it is doing its best to promote GAP to potential customers and make signing up as easy as possible. Great Plains stated that it will consider additional program changes in the future.

**III. DEPARTMENT RECOMMENDATION**

The Department recommends that the Commission accept the utilities' reports.

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<sup>3</sup> Great Plains' GAP limits participating customers' bills to 4% of customer income. Therefore, if an interested customer's bill is already below 4% of the customer's income due to lower gas costs and warmer weather, the customer doesn't qualify for GAP.



**Department Attachment No. 1 – Requirements for 2017 Annual Reports**

Docket Nos. G002/M-18-241, G004/M-18-248, G008/M-18-235, G011/M-18-243, G022/M-18-249

<b>All utilities</b>	
Summary Schedule	A summary schedule containing the: i. Average annual affordability benefit received per customer; ii. Average annual arrearage forgiveness benefit received per customer; iii. Percentage of LIHEAP customers that participated in GAP; iv. Disconnection rates for GAP customers, non-GAP LIHEAP customers, and non-LIHEAP firm customers (all firm customers including C&I); v. Number of GAP participants enrolled as of year-end; vi. Number of GAP participants enrolled and receiving benefits at some time during the year; vii. Annual Program budget; viii. Actual Program revenue; ix. GAP tracker balance as of year-end; x. GAP rate-affordability surcharge (\$/therm); and xi. For all utilities except GMG, the actual Program cost.
<b>Utilities except GMG*</b>	
Payment Frequency	The effect of the GAP on customer payment frequency, including at a minimum a comparison of the payment frequency for customers in GAP to payment frequency before they were enrolled in GAP, plus a comparison of the payment frequency for GAP participants to the payment frequency for LIHEAP grant recipients. The information reported on customer payment frequency must incorporate partial and late payment information.
Payment Amounts	The effect of the GAP on payment amounts, including at a minimum the average annual and monthly bill credit amount, compared to the average GAP participant's annual and average monthly bill and arrearage amount.
Arrears	The effect of the GAP on the number of customers in arrears, and the effect of GAP on arrearage levels—the latter including at a minimum the change in the arrearage level for the average GAP customer compared to the LIHEAP customers that are not enrolled in the GAP and the average level of arrearage for all of the utility's residential customers.
Retention	The effect of the GAP on retention rates.
Complaints	The effect of the GAP on customer complaints, and data on the type and number of complaints.
Collections	The effect of the GAP on customer collection activity.
Coordination	Information relating to how each utility has coordinated its GAP with other available low-income and conservation resources, naming the agencies the utility has coordinated with, how often the utility has communicated with those agencies during the year, the content of those communications, and what was accomplished in terms of coordination.
<b>CenterPoint only</b>	
Conservation Measures	The potential no-, low-, and mid-cost conservation measures that could be implemented in the households of GAP participants, along with CenterPoint's plans to encourage GAP participants to increase their use of these measures.
Customer Eligibility	The number of customers who do not qualify for credits, including zero-credit customers.
<b>Great Plains only</b>	
Participation rate evaluation	An evaluation of the assumed GAP participation rate of five percent in light of actual participation in the Program.
Cost evaluation	The actual annual average cost per participant for the Program, and a discussion concerning any deviation of the actual annual average cost per participant compared to the assumed average annual cost per participant of \$555.
Overall evaluation	Conclusion regarding the reported evaluation data and proposal concerning the GAP on a going forward basis.

## **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  
Comments**

**Docket No. G002/M-18-241, G004/M-18-248, G008/M-18-235, G011/GR-18-243, G022/M-18-249**

**Dated this 17<sup>th</sup> day of April 2018**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street  Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-235_M-18-235
James J.	Bertrand	james.bertrand@stinson.com	Stinson Leonard Street LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-235_M-18-235
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-235_M-18-235
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-235_M-18-235
Ian	Dobson	residential.utilities@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_18-235_M-18-235
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_18-235_M-18-235
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_18-235_M-18-235
Shari	Grams	shari.grams@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-235_M-18-235
Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East  St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-235_M-18-235
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-235_M-18-235

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-235_M-18-235
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-235_M-18-235
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_18-235_M-18-235
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	No	OFF_SL_18-235_M-18-235
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-235_M-18-235
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-235_M-18-235
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-235_M-18-235
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-235_M-18-235

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-241_M-18-241
Ryan	Barlow	Ryan.Barlow@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-241_M-18-241
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd.  St. Louis, MO 63119-2044	Electronic Service	No	OFF_SL_18-241_M-18-241
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-241_M-18-241
Corey	Conover	corey.conover@minneapolismn.gov	Minneapolis City Attorney	350 S. Fifth Street City Hall, Room 210 Minneapolis, MN 554022453	Electronic Service	No	OFF_SL_18-241_M-18-241
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_18-241_M-18-241
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-241_M-18-241
Ian	Dobson	residential.utilities@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_18-241_M-18-241
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_18-241_M-18-241
Edward	Garvey	edward.garvey@AESLconsulting.com	AESL Consulting	32 Lawton St  Saint Paul, MN 55102-2617	Electronic Service	No	OFF_SL_18-241_M-18-241

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_18-241_M-18-241
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-241_M-18-241
Michael	Hoppe	il23@mtn.org	Local Union 23, I.B.E.W.	932 Payne Avenue  St. Paul, MN 55130	Electronic Service	No	OFF_SL_18-241_M-18-241
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street  St. Paul, MN 551012134	Electronic Service	No	OFF_SL_18-241_M-18-241
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-241_M-18-241
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-241_M-18-241
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_18-241_M-18-241
Peder	Larson	plarson@larkinhoffman.com	Larkin Hoffman Daly & Lindgren, Ltd.	8300 Norman Center Drive Suite 1000 Bloomington, MN 55437	Electronic Service	No	OFF_SL_18-241_M-18-241
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620  St. Paul, MN 551640620	Electronic Service	No	OFF_SL_18-241_M-18-241
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-241_M-18-241

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-241_M-18-241
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-241_M-18-241
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-241_M-18-241
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-241_M-18-241
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-241_M-18-241
Zeviel	Simpser	zsimpser@briggs.com	Briggs and Morgan PA	2200 IDS Center80 South Eighth Street  Minneapolis, MN 554022157	Electronic Service	No	OFF_SL_18-241_M-18-241
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-241_M-18-241
Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_18-241_M-18-241
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-241_M-18-241

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_18-243_M-18-243
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-243_M-18-243
Seth	DeMerritt	ssdemerritt@integrysgroup.com	MERC (Holding)	700 North Adams P.O. Box 19001 Green Bay, WI 543079001	Electronic Service	No	OFF_SL_18-243_M-18-243
Ian	Dobson	residential.utilities@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_18-243_M-18-243
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_18-243_M-18-243
Daryll	Fuentes	dfuentes@usg.com	USG Corporation	550 W Adams St  Chicago, IL 60661	Electronic Service	No	OFF_SL_18-243_M-18-243
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th St W  Rosemount, MN 55068	Electronic Service	No	OFF_SL_18-243_M-18-243
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-243_M-18-243
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-243_M-18-243
Colleen	Sipiorski	ctsipiorski@integrysgroup.com	Minnesota Energy Resources Corporation	700 North Adams Street  Green Bay, WI 54307	Electronic Service	No	OFF_SL_18-243_M-18-243



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Stastny	kstastny@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-243_M-18-243
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-243_M-18-243
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-243_M-18-243

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_18-248_M-18-248
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-248_M-18-248
Ian	Dobson	residential.utilities@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_18-248_M-18-248
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_18-248_M-18-248
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-248_M-18-248
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-248_M-18-248

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-249_M-18-249
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-249_M-18-249
Ian	Dobson	residential.utilities@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_18-249_M-18-249
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_18-249_M-18-249
Brian	Gardow	bgardow@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-249_M-18-249
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-249_M-18-249
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-249_M-18-249
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc.	PO Box 68 202 South Main Street Le Sueur, MN 56058	Electronic Service	No	OFF_SL_18-249_M-18-249
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-249_M-18-249