

**Minnesota Chamber of Commerce**  
**Information Request**

Attn: Benjamin L. Gerber  
Minnesota Chamber of Commerce  
400 Robert St. North, Suite 1500  
St. Paul, MN 55101

&

Richard J. Savelkoul  
Martin & Squires, P.A.  
444 Cedar St., Suite 2050  
St. Paul, MN 55101

**Docket Number:**  
E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145, E-132, E-114, E-6521, E-142, E-135/PA-14-322

**Date of Request:** November 14, 2014

**Response Due:** November 28, 2014

In the Matter of a Request for Approval of the Asset Purchase and Sale Agreement Between Interstate Power and Light Company and Southern Minnesota Energy Cooperative

**Requested From:** Interstate Power & Light and SMEC members

**Analyst Requesting Information:** Kavita Maini

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

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Request No. 14.

Please provide **current** unbundled rate \$/MW or MWh comparison for C&I customers for IPL and each member cooperative. E.g.:

| For COOP current Rates |              | IPL                  | Benco | Brown | etc. |
|------------------------|--------------|----------------------|-------|-------|------|
| Base Rates*            | Distribution |                      |       |       |      |
|                        | Industrial   | Generation and other |       |       |      |
| Base Rates*            | Distribution |                      |       |       |      |
|                        | Commercial   | Generation and other |       |       |      |
| Base Rates*            | Distribution |                      |       |       |      |
|                        | TOD          | Generation and other |       |       |      |
| Fuel/purchased power   |              |                      |       |       |      |
| Environmental Rider    |              |                      |       |       |      |

\* please include for each rate class and tariff - We recognize that there are more columns and rows listed and each COOP will not have the same classes or rate tariffs - please indicate which classes will be eliminated and what the IPL customers will be moved to if there is no corresponding rate. Also expand the chart to include all IPL rate classes and Tariffs.

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Request No. 15.

Please provide **post-closing** unbundled rate \$/MW or MWh comparison for C&I customers for IPL and each member cooperative. E.g.:

| For IPL customers post-close |                      | IPL | Benco | Brown | etc. |
|------------------------------|----------------------|-----|-------|-------|------|
| Base Rates*<br>Industrial    | Distribution         |     |       |       |      |
|                              | Generation and other |     |       |       |      |
| Base Rates*<br>Commercial    | Distribution         |     |       |       |      |
|                              | Generation and other |     |       |       |      |
| Base Rates*<br>TOD           | Distribution         |     |       |       |      |
|                              | Generation and other |     |       |       |      |
| Fuel/purchased power         |                      |     |       |       |      |
| Environmental Rider          |                      |     |       |       |      |

\* please include for each rate class and tariff - We recognize that there are more columns and rows listed and each COOP will not have the same classes or rate tariffs - please indicate which classes will be eliminated and what the IPL customers will be moved to if there is no corresponding rate. Also expand the chart to include all IPL rate classes and Tariffs.

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Request No. 16.

Regarding response to MCC-8, please explain with quantitative analysis and relevant workpapers, how IPL rates for first three years, will be modified for IPL wholesale rate increases.

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Request No. 17.

Please provide Burns & McDonald valuation and any other appraisal on equipment and real estate obtained by SMEC.

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Request No. 18.

How is the purchase price and how are assets allocated to member cooperatives?

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Request No. 19.

Has SMEC obtained Wholesale power supply quotes from any other providers in the current market? If so please provide. If not, please provide analysis of comparable current wholesale power market prices.

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Request No. 20.

For each member cooperative please verify ratepayers will have two rate books; one for IPL members and one for current member rates. Please identify the differences.

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Request No. 21.

Regarding response to MCC-4, Please identify if IPL has additional wholesale customers that are not on RES-5 formula rate but rather on negotiated rates. If so, please provide the relevant contracts and detail on the pricing. Please also confirm that this is the rate SMEC will be on.

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Request No. 22.

Please explain how the wholesale power supply rate costs will be classified and allocated to retail customers? Please use current wholesale rate to demonstrate this by customer class and cooperative. Will each cooperative pass through these charges with or without mark up? Please explain. Please also explain any differences in the method over time (eg. first three years and after).

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Request No. 23.

Please more fully detail SMEC and SMEC member's commitment with respect to rate oversight and Commission authority over CCOSS and commitment not to merge rate classes if 5% apart. Please more fully explain the statements and provide examples in operation. Please explain 5% commitment in the event the new Coop does not have a class that IPL maintains (e.g.: some Coops do not have an Industrial class).

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Request No. 24.

Please identify the number of commercial and number of industrial customers each Coop is being assigned.

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Request No. 25.

Please identify tracking and SMEC utilization of PTC plan. Will SMEC PTC's be sold and how will benefits be allocated?

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Request No. 26.

Please explain and track IPL's PUC limited costs, expenses or credits, including but not limited to Transmission, Duane Arnold, WWE, ATA, and others, as well as explain if treatment will change as a result of the transaction.

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Request No. 27.

Please provide coop patronage distributions for past 5 years and projected for future five years for each SMEC member. Please provide patronage credits earned for the past 5 years for each member coop.

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Request No. 28.

Please identify FEMA funds received by each member coop for past 10 years.

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Request No. 29.

Do Coop laws permit board appointments by rate class? Please explain for each SMEC member.

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Request No. 30.

Please explain any premium over book value, as part of the purchase price.

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Request No. 31.

Please identify SMEC audit process for closing and post-closing balances. Identify audit company engaged by SMEC, if any.

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Request No. 32.

Please provide Grant Dollars and other benefits that SMEC member cooperatives have delivered to their individual commercial and industrial ratepayers for past 5 years.

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Request No. 33.

Please provide the rate structure of the current wholesale rate and the related unit energy and demand charges for IPL. Please also provide a five year history of these unit charges. Please also provide the relevant workpapers that show what costs are being recovered?

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Request No. 34.

Please provide the IPL \$/KW-month transmission charges applicable to wholesale customers for the last five years and also provide the \$/KW-month transmission charges to retail customers in IA and MN for the same time period.

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Request No. 35.

Please explain if IPL will be managing the ARRs/FTRs on behalf of the cooperatives or if each cooperative will be managing these costs?

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Request No. 36.

Please provide a comparison of the current IPL \$/MWh unit cost for firm customers in IA vs MN?

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Request No. 37.

Please provide IPL \$/MWh annual fuel costs being recovered in MN vs IA of the last three years?

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Request No. 38.

Did IPL have base rate case proceedings in IA in the last three years? If so, please provide the requested and approved rate increases along with docket numbers.

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Request No. 39.

Please provide a history of the TCR rider charges in IA and MN? Please also explain any and all offsetting credits being provided. Please also explain if and how the transmission rate charged to coops will be different with respect to charges and offsetting credits as compared to the retail customers in IA and MN.

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Request No. 40.

Has IPL protested any ITC related charges at FERC in the last five years? Please briefly explain the protest and outcome at FERC and provide relevant docket numbers. Also explain, how these decisions impacted TCR in Iowa and Minnesota.

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Request No. 41.

Please provide the average demand and maximum demand for each cooperative on an annual basis for the last three years. Please provide this same information for IPL by total system and jurisdiction.

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Request No. 42.

Has IPL had any proceedings in IA regarding the sale? If so, please provide the application and related order

*Attorneys At Law*

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Suite W2750  
St. Paul, MN 55101  
Telephone: 651-767-3740  
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November 14, 2014

*Richard J. Savelkoul*  
Direct Dial # 651-767-3745  
[rsavelkoul@martinsquires.com](mailto:rsavelkoul@martinsquires.com)

*Sent Via E-mail*

Erik C. Madsen  
Director, Regulatory Affairs  
P.O. Box 351  
Cedar Rapids, IA 52406

*Sent Via E-mail*

Brian Krambeer, President  
c/o Tri County Electric Corporation  
31110 Cooperative Way, P.O. Box 626  
Rushford, MN 55971-0626

Re: In the Matter of a Request for Approval of the Asset Purchase & Sale Agreement  
Between Interstate Power and Light Company and Southern Minnesota Energy  
Cooperative  
**MPUC Docket Nos. E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145,  
E-132, E-114, E-6521, E-142, E-135/PA-14-322**  
Our File No. 2021-14

Dear Messrs. Madsen and Krambeer:

Enclosed please find the Minnesota Chamber of Commerce Information Request Nos. 14 - 42 . Please provide answers to myself at the above address as well as copies to the following individuals:

Kavita Maini  
KM Energy Consulting, LLC  
Email: [kmmaini@wi.rr.com](mailto:kmmaini@wi.rr.com)  
961 North Lost Woods Road  
Oconomowoc, WI 53066

Larry Schedin  
LLS Resources, LLC  
Email: [larry@llsresources.com](mailto:larry@llsresources.com)  
12 S. 6<sup>th</sup> Street, Suite 1137  
Minneapolis, MN 55402

If you have any questions please do not hesitate to contact me.

Sincerely,

/e/ Richard J. Savelkoul  
Richard J. Savelkoul

RJS:wsl

cc: Service List  
Larry Schedin (via email)  
Kavita Maini (via email)

## CERTIFICATE OF SERVICE

I, Wendy S. Latuff, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

**Minnesota Chamber of Commerce  
INFORMATION REQUEST NOS. 14 - 42**

MPUC Docket Nos. E-001, E-115, E-140, E-105, E-139, E-124, E-126, E-145,  
E-132, E-114, E-6521, E-142, E-135/PA-14-322

Dated this 14<sup>th</sup> day of November, 2014

/s/ Wendy S. Latuff

Print

Close

## Service List Member Information

Electronic Service Member(s)

Next / Last

| Last Name  | First Name  | Email                                 | Company Name                                      | Delivery Method    | View Trade Secret |
|------------|-------------|---------------------------------------|---|--------------------|-------------------|
| Abbey      | Ross        | abbey@fresh-energy.org                | Fresh Energy                                      | Electronic Service | No                |
| Adam       | Bobby       | bobby.adam@conagrafoods.com           | ConAgra   | Electronic Service | No                |
| Allen      | Michael     | michael.allen@allenergysolar.com      | All Energy Solar                                  | Electronic Service | No                |
| Anderson   | Christopher | canderson@allete.com                  | Minnesota Power                                   | Electronic Service | No                |
| Anderson   | Julia       | Julia.Anderson@ag.state.mn.us         | Office of the Attorney General-DOC                | Electronic Service | Yes               |
| Aune       | John        | johna@bluehorizonsolar.com            | Blue Horizon Energy                               | Electronic Service | No                |
| Bartz      | Rick        | rbartz@ibewlocal949.org               | IBEW Local Union 949                              | Electronic Service | No                |
| Beithon    | Peter       | pbeithon@otpc.com                     | Otter Tail Power Company                          | Electronic Service | No                |
| Bergan     | Sara        | sebergan@stoel.com                    | Stoel Rives LLP                                   | Electronic Service | No                |
| Bertrand   | James J.    | james.bertrand@leonard.com            | Leonard Street & Deinard                          | Electronic Service | No                |
| Black      | William     | bblack@mmua.org                       | MMUA  | Electronic Service | No                |
| Blazar     | William A.  | bblazar@mnchamber.com                 | Minnesota Chamber Of Commerce                     | Electronic Service | No                |
| Bradley    | Michael     | mike.bradley@lawmoss.com              | Moss & Barnett                                    | Electronic Service | No                |
| Brown      | B. Andrew   | brown.andrew@dorsey.com               | Dorsey & Whitney LLP                              | Electronic Service | No                |
| Bull       | Michael J.  | mbull@mncee.org                       | Center for Energy and Environment                 | Electronic Service | No                |
| Cannon     | Joel        | jcannon@tenksolar.com                 | Tenk Solar, Inc.                                  | Electronic Service | No                |
| Carroll    | John J.     | jcarroll@newportpartners.com          | Newport Partners, LLC                             | Electronic Service | No                |
| Chriss     | Steve W.    | Stephen.chriss@wal-mart.com           | Wal-Mart  | Electronic Service | No                |
| Clerk      | City        | sschulte@ci.albertlea.mn.us           | City of Albert Lea                                | Electronic Service | No                |
| Coleman    | Steve       | scoleman@appliedenergyinnovations.org | Applied Energy Innovations                        | Electronic Service | No                |
| Crum       | Lisa        | lisa.crum@ag.state.mn.us              | Office of the Attorney General-PUC                | Electronic Service | No                |
| Daniels    | Lisa        | lisadaniels@windustry.org             | Windustry   | Electronic Service | No                |
| Denison    | Dustin      | dustin@appliedenergyinnovations.org   | Applied Energy Innovations                        | Electronic Service | No                |
| Dobson     | Ian         | ian.dobson@ag.state.mn.us             | Office of the Attorney General-RUD                | Electronic Service | No                |
| Downer     | Steve       | sdowner@mmua.org                      | MMUA  | Electronic Service | No                |
| Engelking  | Betsy       | betsy@geronimoenergy.com              | Geronimo Energy                                   | Electronic Service | No                |
| Ferguson   | Sharon      | sharon.ferguson@state.mn.us           | Department of Commerce                            | Electronic Service | No                |
| Franzen    | Nathan      | nathan@geronimoenergy.com             | Geronimo Energy                                   | Electronic Service | No                |
| Gerber     | Benjamin    | bgerber@mnchamber.com                 | Minnesota Chamber of Commerce                     | Electronic Service | No                |
| Gerhardson | Bruce       | bgerhardson@otpc.com                  | Otter Tail Power Company                          | Electronic Service | No                |
| Goodpaster | Elizabeth   | bgoodpaster@mncenter.org              | MN Center for Environmental Advocacy              | Electronic Service | Yes               |
| Grant      | Bill        | Bill.Grant@state.mn.us                | Minnesota Department of Commerce                  | Electronic Service | No                |
| Grover     | David       | dgrover@itctransco.com                | ITC Midwest                                       | Electronic Service | No                |
| Haar       | Burl W.     | burl.haar@state.mn.us                 | Public Utilities Commission                       | Electronic Service | Yes               |
| Hainault   | Tony        | anthony.hainault@co.hennepin.mn.us    | Hennepin County DES                               | Electronic Service | No                |
| Hamilton   | J Drake     | hamilton@fresh-energy.org             | Fresh Energy                                      | Electronic Service | No                |
| Hays       | Jack        | jack.hays@westwoodps.com              | Westwood Professional Services                    | Electronic Service | No                |
| Heath      | Brandon     | bheath@misoenergy.org                 | MISO Energy                                       | Electronic Service | No                |
| Henkel     | Annete      | mui@mnutilityinvestors.org            | Minnesota Utility Investors                       | Electronic Service | No                |
| Hettwer    | Richard J.  | rj.hettwer@smmpa.org                  | SMMMPA  | Electronic Service | No                |
| Hinkle     | Lynn        | lhinkle@mnseia.org                    | Minnesota Solar Energy Industries Association     | Electronic Service | No                |
| Hinman     | Holly       | holly.r.hinman@xcelenergy.com         | Xcel Energy                                       | Electronic Service | No                |
| Hodnik     | Margaret    | mhodnik@mnpower.com                   | Minnesota Power                                   | Electronic Service | No                |
| Hunt       | Anne        | anne.hunt@ci.stpaul.mn.us             | City of Saint Paul                                | Electronic Service | No                |
| Jelle      | Dwight      | dkjelle@gmail.com                     | Best Power International, LLC                     | Electronic Service | No                |
| Jenkins    | Alan        | aj@jenkinsatlaw.com                   | Jenkins at Law                                    | Electronic Service | No                |
| Jensen     | Linda       | linda.s.jensen@ag.state.mn.us         | Office of the Attorney General-DOC                | Electronic Service | No                |
| Johnson    | Paula       | paulajohnson@alliantenergy.com        | Alliant Energy-Interstate Power and Light Company | Electronic Service | No                |
| Johnson    | Richard     | Rick.Johnson@lawmoss.com              | Moss & Barnett                                    | Electronic Service | No                |



|                |              |                                      |   |                    |     |
|----------------|--------------|--------------------------------------|---|--------------------|-----|
| Jones          | Elizabeth M. | elizabeth.jones@ag.state.mn.us       | Office of the Attorney General-PUC      | Electronic Service | No  |
| Koeller        | Mara         | mara.n.koeller@xcelenergy.com        | Xcel Energy                             | Electronic Service | No  |
| Krambeer       | Brian        | bkrambeer@tec.coop                   | Tri-County Electric Cooperative         | Electronic Service | No  |
| Kramer         | Jon          | jk2surf@aol.com                      | Sundial Solar                           | Electronic Service | No  |
| Krueger        | Jim          | jkruieger@fmcs.coop                  | Freeborn-Mower Cooperative Services     | Electronic Service | No  |
| Krug           | Allen        | allen.krug@xcelenergy.com            | Xcel Energy                             | Electronic Service | No  |
| Landsman       | Jeffrey L.   | jlandsman@wheelerlaw.com             | Wheeler, Van Sickle & Anderson, S.C.    | Electronic Service | No  |
| LeVander, Jr.  | Harold       | hlevander@felhaber.com               | Felhaber, Larson, Fenton & Vogt, P.A.   | Electronic Service | No  |
| Lindell        | John         | agorud.ecf@ag.state.mn.us            | Office of the Attorney General-RUD      | Electronic Service | Yes |
| Long           | Bob          | rlong@larkinhoffman.com              | Larkin Hoffman (Silicon Energy)         | Electronic Service | No  |
| Lundberg       | Rebecca      | rebecca.lundberg@powerfullygreen.com | Powerfully Green                        | Electronic Service | No  |
| MacCallum      | Casey        | casey@appliedenergyinnovations.org   | Applied Energy Innovations              | Electronic Service | No  |
| Maccabee       | Paula        | Pmaccabee@justchangelaw.com          | Just Change Law Offices                 | Electronic Service | No  |
| Madsen         | Erik         | ErikMadsen@alliantenergy.com         | Alliant Energy                          | Electronic Service | No  |
| Maini          | Kavita       | kmairi@wi.rr.com                     | KM Energy Consulting LLC                | Electronic Service | No  |
| Marshall       | Pam          | pam@energycents.org                  | Energy CENTS Coalition                  | Electronic Service | No  |
| McIntire       | Natalie      | natalie.mcintire@gmail.com           | Wind on the Wires                       | Electronic Service | No  |
| Means          | Valerie      | valerie.means@lawmoss.com            | Moss & Barnett                          | Electronic Service | No  |
| Meloy          | Brian        | brian.meloy@stinsonleonard.com       | Stinson, Leonard, Street LLP            | Electronic Service | No  |
| Merz           | Gregory R.   | gregory.merz@gpmlaw.com              | Gray, Plant, Mooty                      | Electronic Service | No  |
| Mihalchick     | Steve        | steve.mihalchick@state.mn.us         | Office of Administrative Hearings       | Electronic Service | No  |
| Moeller        | David        | dmoeller@allete.com                  | Minnesota Power                         | Electronic Service | No  |
| Moratzka       | Andrew       | apmoratzka@stoel.com                 | Stoel Rives LLP                         | Electronic Service | No  |
| Morud          | Marlin       | mmorud@trunorthsolar.com             | Tru North Solar                         | Electronic Service | No  |
| Nelson         | Carl         | cnelson@mncee.org                    | Center for Energy and Environment       | Electronic Service | No  |
| Noble          | Michael      | noble@fresh-energy.org               | Fresh Energy                            | Electronic Service | No  |
| Nordstrom      | Rolf         | rnordstrom@gpsid.net                 | Great Plains Institute                  | Electronic Service | No  |
| Norris         | Samantha     | samanthanorris@alliantenergy.com     | Alliant Energy                          | Electronic Service | No  |
| Nyhus          | Steven       | swnyhus@flaherty-hood.com            | Flaherty & Hood PA                      | Electronic Service | No  |
| Patel          | Priti R.     | priti.r.patel@xcelenergy.com         | Xcel Energy                             | Electronic Service | No  |
| Pickard        | Donna        | dpickard@aladdinsolar.com            | Aladdin Solar                           | Electronic Service | No  |
| Pickard        | Charlie      | cpickard@aladdinsolar.com            | Aladdin Solar                           | Electronic Service | No  |
| Prest          | Gayle        | gayle.prest@minneapolismn.gov        | City of Mpls Sustainability             | Electronic Service | No  |
| Ricci          | Enio         | ericci@invenergyllc.com              | Invenergy LLC                           | Electronic Service | No  |
| Rosier         | Michelle     | michelle.rosier@sierraclub.org       | Sierra Club                             | Electronic Service | No  |
| Savelkoul      | Richard      | rsavelkoul@martinsquires.com         | Martin & Squires, P.A.                  | Electronic Service | No  |
| Saville        | Kevin        | kevin.saville@ftr.com                | Citizens/Frontier Communications        | Electronic Service | No  |
| Schedin        | Larry L.     | Larry@LLSResources.com               | LLS Resources, LLC                      | Electronic Service | No  |
| Schuerger P.E. | Matthew J.   | mjsreg@earthlink.net                 | Energy Systems Consulting Services, LLC | Electronic Service | No  |
| Shaddix Elling | Janet        | jshaddix@janetshaddix.com            | Shaddix And Associates                  | Electronic Service | No  |
| Shea           | Erin         | eshea@silicon-energy.com             | Silicon Energy                          | Electronic Service | No  |
| Shoemaker      | Doug         | dougs@mnRenewables.org               | MRES                                    | Electronic Service | No  |
| Spangler, Jr.  | Ron          | rlspangler@otpc.com                  | Otter Tail Power Company                | Electronic Service | No  |
| Stastny        | Kristin      | stastny.kristin@dorsey.com           | Dorsey & Whitney LLP                    | Electronic Service | No  |
| Stephenson     | Donna        | dstephenson@greenergy.com            | Great River Energy                      | Electronic Service | No  |
| Stojan Ruccolo | Erin         | ruccolo@fresh-energy.org             | Fresh Energy                            | Electronic Service | No  |
| Strommen       | James M.     | jstrommen@kennedy-graven.com         | Kennedy & Graven, Chartered             | Electronic Service | No  |
| Sundin         | Deb          | deb.sundin@xcelenergy.com            | Xcel Energy                             | Electronic Service | No  |
| Thompson       | SaGonna      | Regulatory.Records@xcelenergy.com    | Xcel Energy                             | Electronic Service | No  |
| Thompson       | JoAnn        | jthompson@otpc.com                   | Otter Tail Power Company                | Electronic Service | No  |
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Next / Last

## Paper Service Member(s)

| Last Name | First Name | Company Name         | Address  | Delivery Method | View Trade Secret |
|-----------|------------|----------------------|--|-----------------|-------------------|
| Baldwin   | Rebecca J. | Spiegel & McDiarmid  | 1333 New Hampshire Avenue NW, Washington, DC-20036       | Paper Service   | No                |
| Conrad    | Joan       | Iowa Utilities Board | 1375 E. Court Avenue, Room 69, Des Moines, IA-50319-0069 | Paper Service   | No                |

|           |             |                                    |  |               |    |
|-----------|-------------|------------------------------------|--|---------------|----|
| Director  | Executive   | League Of MN Cities                | 145 University Avenue West, St Paul, MN-551032044                | Paper Service | No |
| Droessler | Bill        | Izaak Walton League of America-MWO | 1619 Dayton Ave Ste 202, Saint Paul, MN-55104                    | Paper Service | No |
| Franzen   | Doug        | Franzen & Associates, LLC          | 1675 Highland Pkwy, St. Paul, MN-55116                           | Paper Service | No |
| Hanson    | Samuel      | Briggs And Morgan, P.A.            | 2200 IDS Center E, 80 South Eighth Street, Minneapolis, MN-55402 | Paper Service | No |
| Pomper    | David E.    | Spiegel & McDiarmid                | 1333 New Hampshire Avenue NW, Washington, DC-20036               | Paper Service | No |
| Porath    | Benjamin L. | Dairyland Power Cooperative        | 3200 East Avenue South, PO Box 817, La Crosse, WI-546020817      | Paper Service | No |
| Sanford   | Dan L.      | American Transmission Company LLC  | W234 N2000 Ridgeview Pkwy Court, Waukesha, WI-53188-1022         | Paper Service | No |
| Shaver    | Gary        | Silicon Energy                     | 3506 124th St NE, Marysville, WA-98271                           | Paper Service | No |
| Videto    | Stephen J.  | ITC Holding Corp.                  | 27175 Energy Way, Fifth Floor, Novi, MI-48377                    | Paper Service | No |