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March 31, 2015

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
Metro Square – Suite 350
212 7th Place East
St. Paul, MN 55101-2147

**Re: Minnesota Energy Resources Corporation's Gas Affordability Program
2014 Annual Report**

Docket No. G-011/M-15-____

Dear Mr. Wolf:

Enclosed for filing please find Minnesota Energy Resources Corporation's (MERC or Company) Gas Affordability Program (GAP) 2014 Annual Report. MERC submits this report pursuant to the Company's Gas Affordability Service Program, MERC Tariff Sheet Nos. 7.09-7.12, and the Minnesota Public Utilities Commission's (Commission) Orders in Docket No. G-011/M-07-1131. In accordance with the Commission's November 26, 2014 Order Accepting Gas Affordability Program Annual Reports, MERC submits this filing as a new miscellaneous filing in compliance with the Commission's Rules of Practice and Procedure.

Please feel free to contact me at (612) 340-2881 if you have any questions.

Sincerely yours,

/s/ Michael J. Ahern

Michael J. Ahern

cc: Service List

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger
Nancy Lange
Dan Lipschultz
John Tuma
Betsy Wergin

Chair
Commissioner
Commissioner
Commissioner
Commissioner

Minnesota Energy Resources Corporation's
Gas Affordability Program 2014 Annual Report

Docket No. G-011/M-15-_____

**MINNESOTA ENERGY RESOURCES CORPORATION'S GAS AFFORDABILITY PROGRAM
2014 ANNUAL REPORT**

Pursuant to Minnesota Rules Part 7829.1300, Minnesota Energy Resources Corporation ("MERC") submits this miscellaneous rate change and tariff filing to the Minnesota Public Utilities Commission ("Commission") for approval of MERC's Gas Affordability Program 2014 Annual Report.

I. Summary of Filing

Pursuant to Minn. R. 7829.1300, subp. 1, a one-paragraph summary of the filing is attached.

II. Service

Pursuant to Minn. R. 7829.1300, subp. 2, MERC has served a copy of this petition on its general service list, the Department of Commerce, Division of Energy Resources (Department) and the Office of the Attorney General – Antitrust and Utilities Division (OAG).

III. General Filing Information

Pursuant to Minn. R. 7829.1300, subp.3, the following information is provided:

A. Name, Address, and Telephone Number of the Utility

Minnesota Energy Resources Corporation
1995 Rahnclyff Court, Suite 200
Eagan, MN 55122
(651) 322-8901

B. Name, Address, and Telephone Number of Attorney for the Utility

Michael J. Ahern
Dorsey & Whitney LLP
50 S. Sixth Street, Suite 1500
Minneapolis, MN 55402-1498
(612) 340-2881

C. Date of the Filing and Proposed Effective Date

Date of Filing: March 31, 2015
Proposed Effective Date: Not Applicable

D. Statute Controlling Schedule for Processing the Filing

Under Minn. R. 7829.0100, subp. 11, this petition is a “miscellaneous” filing because no determination of MERC’s general revenue requirement is necessary. Comments on a miscellaneous filing are due within 30 days of filing, with replies due 10 days thereafter. Minn. R. 7829.1400, subp. 1, 4.

E. Signature and Title of Utility Employee Responsible for the Filing



James Phillippo
1995 Rahncliff Court, Suite 200
Eagan, MN 55122
(920) 433-5763

IV. Miscellaneous Information

Pursuant to Minnesota Rule 7829.0700, MERC requests that the following persons be placed on the Commission’s official service list for this matter:

James Phillippo
Program Manager – Energy Efficiency/Public Benefits
Minnesota Energy Resources Corporation
1995 Rahncliff Court, Suite 200
Eagan, MN 55122
(920) 433-5763
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If additional information is required, please contact Michael J. Ahern at (612) 340-2881.

DATED: March 31, 2015

Respectfully Submitted,

DORSEY & WHITNEY LLP

By /s/ Michael J. Ahern

Michael J. Ahern

Suite 1500, 50 South Sixth Street

Minneapolis, MN 55402-1498

Telephone: (612) 340-2600

Attorney for Minnesota Energy
Resources Corporation

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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SUMMARY OF FILING

Pursuant to Minnesota Rules Part 7829.1300, Minnesota Energy Resources Corporation ("MERC") submits this miscellaneous rate change and tariff filing to the Minnesota Public Utilities Commission ("Commission") for approval of MERC's Gas Affordability Program 2014 Annual Report.

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Minnesota Energy Resources Corporation's
Gas Affordability Program 2014 Annual Report

Docket No. G-011/M-15-_____

**MINNESOTA ENERGY RESOURCES CORPORATION'S GAS AFFORDABILITY PROGRAM
2014 ANNUAL REPORT**

Minnesota Energy Resources Corporation ("MERC" or the "Company") submits this Annual Report in compliance with the Company's Gas Affordability Service Program ("GAP" or "Program") (MERC Tariff Sheet Nos. 7.09 to 7.12) and the Minnesota Public Utilities Commission's ("Commission") December 29, 2011 Order Accepting Report, Extending Program, and Increasing Gas Affordability Surcharge ("Order") in this matter. MERC's GAP became effective on April 1, 2008, and the initial four-year program term ended on December 31, 2011. The Commission authorized MERC to continue GAP for an additional four years in its Order in Docket No. G-007,011/M-07-1131 dated December 29, 2011. The Commission's December 29, 2011 Order also authorized MERC to consolidate its GAP programs for MERC-PNG and MERC-NMU effective with rate area consolidation in MERC's 2010 rate case in Docket No. G-007,011/GR-10-977. This Annual Report covers the program year 2014 – the seventh year of service under the Program.

The Annual Report is structured as follows:

- A. Program Description
- B. Program Credits, Funding, and Administration Costs
- C. Program Participation
- D. Retention, Satisfaction, and Disconnections

- E. Arrears, Customer Payment Frequency, and Collection Activity
- F. Additional Reporting Requirements
- G. New Reporting Requirements

In addition, the GAP Tracker for MERC is included as Attachment A to this Report.

Pursuant to the Commission's September 25, 2013 Order Accepting Gas Affordability Program Reports. MERC also submits a summary schedule as Attachment B, which includes the following information, as required by the Commission's September 25, 2013 Order:

1. average annual affordability benefit received per customer;
2. average annual arrearage forgiveness benefit received per customer;
3. percentage of Low Income Home Energy Assistance Program (LIHEAP) customers that participated in GAP;
4. disconnection rates for (a) GAP customers, (b) LIHEAP-Non GAP customers, and (c) non-LIHEAP customers (all firm customers including C&I);
5. number of GAP participants enrolled as of year-end;
6. number of GAP participants enrolled and receiving benefits at some time during the year;
7. annual program budget;
8. actual program revenue;
9. actual program cost;
10. GAP tracker balance as of year-end; and
11. GAP rate-affordability surcharge (\$/therm).

A. Program Description

GAP is designed to lower the percentage of income that low-income households devote to energy bills, to increase customer payments, and to reduce the utility's cost associated with the collection of unpaid bills. The Program consists of two components, which are designed to assist low-income households: the Affordability Component, which consists of bill credits determined by calculating the difference between the estimate of the customer's annual natural

gas bill and the applicable income limit of the customer's household income,¹ and the Arrearage-Forgiveness Component, which provides a monthly matching credit to the customer's balance after payment is received to retire pre-program arrears.²

Qualified customers must: (1) agree to be placed on a levelized payment plan and payment schedule rather than a budget or cold-weather rule ("CWR") payment arrangement; (2) notify MERC of any changes in address, income level, or household size; and (3) maintain a consistent payment schedule. MERC will maintain service and suspend collection activities to qualified customers, regardless of arrears balances, if the customer stays current with the payment schedule and otherwise maintains eligibility. The Company partners with The Salvation Army to administer the Program. MERC implemented the GAP pilot on April 1, 2008, in compliance with Minn. Stat. § 216B.16, subd. 15.

1. Eligibility

The Program is available to any MERC residential customer who meets the qualifications and receives assistance from the Low Income Home Energy Assistance Program ("LIHEAP") during the Program year. Qualified customers must agree to be placed on a levelized payment plan (as opposed to being on a regular budget or CWR payment plan). At the time of enrollment, qualified customers must agree to a payment schedule on half of their outstanding arrears. Qualified customers must also maintain an active account in the customer's name at the customer's permanent, primary residence. If a qualified customer fails

¹ Specifically, MERC's Affordability component consists of a bill credit determined as one-twelfth of the difference between MERC's estimate of the Qualified Customer's annual gas bill and 6% of the Qualified Customer's household income as provided by the Qualified Customer to MERC. This bill credit is a Program cost that is included in the Tracker. Any energy assistance sums not applied to arrears will be applied to a Qualified Customer's current bill. MERC Tariff Sheet No. 7.09.

² MERC's Arrearage-Forgiveness component consists of a monthly credit that will be applied each month after receipt of the Qualified Customer's payment. The credit will be designed to retire pre-program arrears over a period of up to 24 months, with the Company matching the Qualifying Customer's contribution to retiring pre-program arrears. The credit is determined by taking the pre-program arrears divided by the number of months to retire the arrears divided by two and then subtracting any energy assistance sums received by the Company on behalf of the customer divided by the number of months remaining to retire the arrears divided by two. This arrearage forgiveness credit is a Program cost that will be included in the Tracker. MERC Tariff No. 7.09.

to pay two consecutive monthly payments in full under the Program, the customer is terminated from the Program. If the customer is terminated, the customer will be subject to the Company's regular collection practices, including the possibility of disconnection.

2. Affordability and Arrearage Forgiveness

The Program has two components: an Affordability component and an Arrearage-Forgiveness component. The Affordability component is a bill credit determined as one-twelfth of the difference between the customer's estimated natural gas bill and six percent of the customer's household income. Once enrolled, any primary heat energy assistance sums are applied to GAP customers' current bills (in accordance with LIHEAP program guidelines) and the balance is applied to future bills.

The Arrearage-Forgiveness component is a matching credit that is applied to a qualified customer's account each month after receipt of the customer's scheduled arrears payment. This monthly credit and customer monthly payment pays off the pre-program arrears in 24 months or less. Energy assistance is not considered in calculating the affordability bill credit or the forgiveness of pre-program arrears.

The Affordability and Arrearage-Forgiveness credits are both Program costs that are included in the Tracker. See Attachment A.

3. Payment

To determine the payment amount for a customer, the Company reviews current bills, consumption information, and household income information. A qualified customer's payment schedule includes both payment of the customer's current month's bill (which reflects one-twelfth of the levelized payment plan), after inclusion of the Affordability credit, and payment of 1/48th of the qualified customer's pre-program arrears, less any energy assistance credit applied to the account each month, until the credit balance is exhausted. Customers enrolled in the Program paid or applied energy assistance worth a total of \$1,339,082 towards their energy

costs in 2014. The average monthly payment per GAP participant in 2014 (including through energy assistance credits) was \$90 per month.

B. Program Credits, Funding, and Administration Costs

Below is a summary of the GAP Tracker activity for MERC in 2014. For additional detail, please see Attachment A.

Summary of 2014 MERC GAP Tracker

ITEM	AMOUNT
Affordability Credits	\$628,002
Arrearage-Forgiveness Credits	\$15,062
Administrative Fees	\$50,000
Carry Cost	\$20,330
Amortization from Pilot Balance	\$178,180
Total Program Costs	\$891,575
Collections Through Rates	\$1,457,066
Amount Over/(Under) Collected in 2014	\$565,491

1. Program Credits

The total of the Affordability and Arrearage-Forgiveness credits applied to GAP-participant accounts during the 2014 Program year was \$643,064.78. The average monthly Affordability credit per customer was \$25.40.

2. Program Funding

In 2014, the Program was funded by a per-therm charge of \$0.00441 on all MERC firm system customers. From January 1, 2014, through December 31, 2014, MERC collected \$1,457,066.41 from its firm customers for Program costs. In comparison, MERC collected \$1,329,505.70 for Program costs in 2013.

As the figures above indicate, 2014 funding increased by about \$127,561 over 2013. Collections from firm customers exceeded the \$1 million Program cap by \$457,066. 2014 was the highest funded program year to date, with the funding exceeding the Program costs by \$565,491. MERC has now carried unspent dollars forward three years in a row. A major factor in this over-funding scenario continued to be the fact that the monthly program surcharge is assessed on a per-therm basis and natural gas consumption was still significantly higher during the months of January-March 2014 than historic averages. Some of the under-spending continues to be attributed to reduced and eliminated participant arrears among the longer-term participants. Also, a fairly high percentage of the new enrollees had lower arrearages and lower percent-of-income credits. This trend suggests that more households from the higher end of the low-income household bracket are participating. These customers tend to carry lower arrearages. MERC is already facing the reality that the over-funding scenario is going to continue into 2015, with natural gas consumption being only slightly lower in the winter of 2015. However, MERC expects that more arrears forgiveness spending will occur in 2015, as it plans to promote the Program more to customers with the highest arrears, coming out of the CWR period.

3. Program Administration Costs

As shown in the table above, MERC's total Program costs in 2014 were \$891,575, which includes the Affordability and Arrearage-Forgiveness credits, administrative costs, and approved amortization and carrying cost allowances. At the close of the 2011 Program pilot, the Commission authorized MERC to recover the projected tracker balance as of December 31, 2011, amortized over a four-year period plus the \$1 million proposed annual budget through a revised per-therm rate of \$0.00441 per therm. The total Program administration costs for 2014 were held at \$50,000, which is five percent of total Program costs. The GAP tariff limits the amount of administrative costs included in the Tracker (except start-up costs) to five percent of total Program costs. MERC has maintained that threshold each Program year.

C. Program Participation

MERC experienced a dramatic increase in enrollments in the second half of 2014. As of December 31, 2014, there were 2,060 customers who were enrolled in the Program. There were a total of 980 new enrollees in 2014. By way of comparison, in 2013, there were 97 new enrollees. Thus, new enrollments were 1,010 percent higher in 2014 than in 2013. New enrollments accounted for 48 percent of program participants at the end of 2014 and customer participation in GAP increased by approximately 90 percent in 2014, despite an increase in program removals in 2014. In terms of the number of new enrollments, 2014 was the most successful year since 2008, the first year of the Program. The Salvation Army received 2,968 applications in 2014. Unfortunately, 1,988 customers were not eligible because they did not have active gas service, were not the customer of record, were not LIHEAP recipients (all of whom were encouraged to apply for Energy Assistance), or did not qualify for a percent-of-income credit (high income relative to gas consumption). MERC has plans to maintain ongoing GAP promotions in 2015 and has already worked with Program partners to begin that effort. MERC offered program enrollment when customers apply for CWR protection and when customers are in the collection process, especially when customers are facing potential disconnection of service. MERC will also promote GAP enrollment when customers are removed from CWR protection on April 16, 2015 - a time when many who qualify are carrying greater arrears. Unfortunately, in 2014, an increased number of these participants were short-term, as they did not keep up the payment agreement and were removed from GAP. MERC is adjusting its approach this spring. More than 1,000 CWR-protected customers were identified who have arrears greater than \$500 and have not previously participated in GAP. MERC will do a direct mailing to this group of customers the first week of April 2015, immediately before CWR protection ends. MERC also conducted some additional training with call center agents about the benefits of GAP, especially for those coming out of the CWR period with significant arrears.

This training encourages call center agents to proactively help customers enroll in GAP to address those arrears over a longer period of time.

D. Retention, Satisfaction, and Disconnections

1. Retention

Nine-hundred and eighty new customers enrolled in the Program in 2014. Unfortunately, with higher enrollments and participation, the default and un-enrollment numbers increased as well. Of all customers participating in the Program in 2014, 161 defaulted from the Program due to non-payment. In comparison, 59 customers defaulted due to non-payment in 2013. Additionally, 149 customers were removed from the Program in 2014. Of this group of customers, 86 customers were no longer income-eligible (i.e., no longer Energy Assistance Program recipients), 29 customers had large credit balances and agreed to be successfully removed from the Program, and 34 were removed due to a household move – a small decrease from 2013. MERC provides a follow-up letter to all customers who are removed from the Program as a result of a move, alerting them of the need to make payment arrangements for any outstanding account balance and advising them of the option to reenroll if they are still a MERC customer at a different service address. MERC's reenrollment rate with customers who move within MERC's service territory has been uneven. MERC has not tracked the number of customers that reenroll after a long absence. But the Company does see some reenrollment of the same customers after an extended absence.

In 2014, six percent of customers were unenrolled from the Program because they were no longer income eligible or moved. For comparison, five percent of customers were unenrolled for these reasons in 2013. In 2014, eight percent of program participants were removed from the Program due to payment default. Overall, MERC's GAP-retention rate remains strong.

MERC reviews accounts annually to unenroll GAP participants who have not applied for and received Energy Assistance. MERC will complete this review in July 2015, after the Energy Assistance program year closes and all credits are applied to accounts. MERC also conducts

annual reviews for accounts with large credit balances and contacts these customers to see if they would like to be successfully unenrolled from the Program. MERC informs customers who are successfully unenrolled from the Program that they may apply again (at any time) as long as they are still LIHEAP recipients. Few of these customers want to be removed, regardless of the size of their credit balance.

A consistent number of qualified GAP customers who successfully pay their arrears balance over a two-year period continue to participate in the Program and receive the monthly percent-of-income credit. In fact, there are still almost 300 customers participating in GAP who have been enrolled since the first year of the Program in 2008. The Arrears-Forgiveness component is important to the short-term success of the Program; however, arrears forgiveness only accounted for around one percent of program costs in 2014. Seventy percent of the Program costs and 98 percent of the total monthly credits applied were used for the percent-of-income credits in 2014. The Affordability component is important to the Program's lasting success because it reflects participants' long-term ability and willingness to make affordable payments for natural gas. Helping customers move toward self-sufficiency is a very important goal of most assistance programs and eliminating all pre-enrollment arrears over a two-year period of time is a very successful outcome of the GAP program. None of the participants who enrolled in 2008 have carried arrears since 2010, which is a significant accomplishment given the challenges many of these households face.

2. Customer Satisfaction

MERC has never conducted a formal customer satisfaction survey that addresses participation in the Program. But the Salvation Army, and the MERC Call Center, Credit and Collections, and Energy Assistance teams receive informal feedback from GAP participants. Participants have identified the following benefits of the Program:

- Ability to extend arrears payments over 24 months;

- Arrearage forgiveness for half of their arrears at enrollment, which was a greater benefit to an increased number of new enrollees in 2014;
- Eliminating all pre-enrollment arrears in a 2-year period of time;
- Not creating new arrears, by paying the difference between their monthly gas bill and the monthly Affordability credit, which also motivates them to be more efficient with their gas use;
- Lower and more realistic monthly payment, which allows participants to budget their household income more successfully and increase their ability to pay other important household monthly bills;
- Avoidance of collection activity, up to and including gas service disconnection;
- Long-term assistance (continuing to receive the monthly Affordability credit on their gas bill), which allows participants to budget limited household income and better withstand smaller financial setbacks; and
- The ability to continue to receive Energy Assistance benefits, which also lowered the number of monthly payments they had to make.

In 2014, MERC reenrolled five customers who defaulted from the Program due to financial or medical hardship. MERC would have prevented program default but did not know about the hardship until after default. These customers had good payment histories until the financial hardship and had legitimate reasons for defaulting. These customers were grateful and remained successful after reenrollment.

MERC is unaware of any complaints made by 2014 Program participants to the Company, the Commission, the Attorney General's Office, or the Salvation Army.

3. Disconnections

During 2014, 39 GAP customers had gas service disconnected within two months of their removal from the Program after missing two consecutive monthly GAP payments. However, enrollment in the Program helped to prevent 93 gas-service disconnections, which is significantly higher than any previous year. Despite the fewer disconnect notices issued in 2014, MERC proactively informed recipients of disconnect notices about GAP. Many of these customers enrolled in GAP, thus avoiding disconnection or the challenge of adhering to a more compressed payment arrangement.

MERC had approximately 218,015 firm customers on its system in 2014. MERC completed approximately 6,925 firm customer gas service disconnections in 2014, which equates to three percent of all firm customers. GAP customers continued to account for a small fraction of one percent of these disconnects in 2014—only 39 accounts were disconnected within two months of being removed from the Program due to payment default.

E. Arrears, Customer Payment Frequency, and Collection Activity

1. Arrears

There were 980 customers who enrolled in GAP during the 2014 Program year. Three hundred and sixty four of these customers were in arrears at the time of Program enrollment. Their total arrears were \$35,277, or \$97 per customer. Although there were more new enrollees in arrears at the time of enrollment in 2014 as compared to 2013, the average arrears were lower.

The overall amount of arrears and arrears per customer have fluctuated over the last few years. Overall gas costs in 2014 were higher, but many of GAP participants also received higher Energy Assistance credits.

2. Effect of Program on Customer Payment Frequency

In 2014, customers enrolled in GAP made 14,922 payments. The total value of these payments, which include application of energy assistance was \$1,339,082, which equates to a monthly average of approximately \$90 per GAP participant. This compares to 9,928 payments made by GAP participants in 2013, totaling \$625,969, which equated to average monthly payments of \$63 per GAP participant. In 2012 MERC received 10,486 payments from GAP customers, totaling \$719,543, which equated to average monthly payments of \$68 per GAP participant. MERC provides further discussion of Program participation payments in Section F.1., Customer Payment Frequency.

3. Collection Activity

In 2014, MERC saved \$6,975 due to the enrollment of 93 customers in GAP who had received a disconnect notice before enrolling. These cost savings take into account that these customers would likely have had their gas service disconnected. Each disconnection the Company avoids ensures that the customer remains in service and avoids reconnection fees. MERC also avoids the costs of disconnection notices, employee field visits, collection and call center staff, and reconnection. These savings compare to cost savings of \$2,700 in 2013. These savings do not account for the additional cost of service reconnection, which would, at minimum, double the cost savings. This continues a positive trend for customers.

Overall, the Program continued to succeed in reducing and eliminating arrears of Program participants in 2014, promoting regular monthly payment trends, and allowing customers to make realistic monthly payments for an extended period of time. It has also helped more GAP customers avoid the collection process. MERC continues to monitor the success of customers who have participated in the Program for a number of years to determine whether these customers are able to continue making regular payments with the assistance of the Affordability credit over multiple years of participation. For many customers, reducing their monthly bill by \$30-\$40 each month can be the difference between staying even and falling behind on their gas and other vital household bills. GAP continues to make it possible for more households to move toward self-sufficiency.

F. Additional Reporting Requirements

1. Customer Payment Frequency

The following tables compare customer payment frequency of all GAP participants in 2014 to the payment frequency of participating customers in 2013 and 2012. MERC also separated the payment frequency for the 980 new enrollees and for all LIHEAP recipients. GAP customer payments include payments made by customers as well as LIHEAP-energy assistance and other agency assistance payments that have been credited to their accounts.

GAP Customer Payment Frequency – All Customers Participating			
	MERC-NMU	MERC-PNG	MERC Total
Payments made by GAP customers in 2014			14,922 7 payments per GAP customer
Payments made by GAP customers in 2013			9,928 9 payments per GAP customer
Payments made by GAP customers in 2012	3,710 9 payments per GAP customer	6,776 10 payments per GAP customer	10,486 10 payments per GAP customer
GAP Customer Payment Frequency – New Customers in Program Year			
	MERC-NMU	MERC-PNG	MERC Total
Payments Made in 2014			9,697 10 payments per GAP customer
Payments Made in 2013			640 7 payments per GAP customer
Payments Made in 2012	226 8 payments per GAP customer	4548 payments per GAP customer	680 8 payments per GAP customer
Customer Payment Frequency – LIHEAP Recipients			
	MERC-NMU	MERC-PNG	MERC Total
Payments Made in 2014			138,264 10 payments per LIHEAP recipient
Payments Made in 2013			120,602 10 payments per LIHEAP recipient
Payments Made in 2012	42,641 10 payments per LIHEAP recipient	83,429 10 payments per LIHEAP recipient	126,070 10 payments per LIHEAP recipient

Overall, the number of payments increased in 2014. MERC attributes some of this increase to higher energy assistance credits. The number of customers with credit balances on their accounts reduced the number of payments they had to make, because a credit balance is

carried over month to month. There were two other contributing factors that resulted in overall payments being higher in 2014 – the participation number dramatically increased and most of the energy assistance credits were paid over four months. Therefore, these payment-credits were counted on some customers’ accounts each of those months. GAP program data continues to provide evidence that this group of customers can make their payments if their monthly bill is reasonable or income-adjusted.

The payment data for the 2014 GAP enrollees is difficult to compare with overall payments the last few years because of the increase in enrollments. And again, the number of full payments recorded each month increased because most Energy Assistance credits are made over four months. MERC also saw a substantial increase in the number of LIHEAP recipients in 2014. Similar to GAP, the increase in LIHEAP enrollees increased the number of payments in 2014. It has been difficult to draw conclusions in comparing the monthly payment practices of these three customer groups because of the many uncontrolled factors that contribute to the amounts and payment frequency such as growing credit balances on participants’ accounts, LIHEAP funding levels and payment schedules, weather, gas cost, number in household, and fluctuation in household income.

2. Disconnection of Gas Service

Below are the 2014 disconnections by customer category:

Customer Category	Number of Disconnections	Percentage of Customers
2014 Firm Customers (218,015)	6,925	3%
2014 GAP Participants (2,060)	39	2%
2014 LIHEAP Recipients (Non-GAP Participants) (13,204)	1,713	13%

3. Payment Amount

The table below shows the average annual and monthly bill credit amounts for GAP participants and a comparison of these amounts to GAP participants' annual and average monthly bill and account balance. This data includes all GAP customers, regardless of arrears or credit balance. In particular, 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 credit balance. Because the total credit balance exceeded the total arrears balance, the average account balance was negative (i.e., a credit). The average percent-of-income credits were down overall in 2014, partly because participants' income at enrollment was generally higher, resulting in a lower credit each month. The substantial increase in participants is also a major factor in the data points. There were more new participants in arrears. But their arrears were lower on average. The number of participants in arrears does not significantly impact the overall monthly program spending as arrears are spread out over 24 months. Another group of customers who were carrying large account credit balances were removed from the Program in 2014 because they were no longer income eligible, moved out of their current service address, or agreed to be removed from the Program due to successful participation. However, a large number of customers still had credit balances at the end of 2014.

	Average Annual Bill Credit	Monthly Average Bill Credit	Average Annual Bill	Average Monthly Bill	Average Arrearage (Account Balance)
MERC	\$305	\$37	\$264	\$22	-\$552

4. Customer Payment History

The following chart represents the number of GAP customers making full, partial, and no payments each month in 2012, 2013, and 2014. All energy assistance and other community assistance payments on GAP customers' accounts are counted as customer payments the month they are received and posted to the account. However, MERC did not record payments

received for months that GAP customers had a credit balance (due to the previous posting of lump sum energy assistance payments or months that Percent of Income credits are larger than customers' gas bills being posted to their accounts) as payments so that only the monthly payments are reflected.

GAP 2012 - Customer Count						
Month	Full Payment		Partial Payment		No Payment	
	NMU	PNG	NMU	PNG	NMU	PNG
January	467	839	84	160	15	20
February	463	836	112	220	10	9
March	243	445	55	134	5	5
April	207	372	59	135	15	4
May	162	315	73	123	10	0
June	164	274	57	104	7	3
July	154	275	43	64	12	5
August	156	293	39	67	11	6
September	153	264	27	49	13	8
October	197	375	33	57	14	9
November	316	571	36	62	12	16
December	359	662	51	80	17	21

GAP 2013 - Customer Count			
Month	Full Payment	Partial Payment	No Payment
January	872	40	239
February	776	92	219
March	786	72	207
April	829	17	165
May	838	25	144
June	728	57	228
July	622	59	401
August	727	71	241
September	741	47	196
October	857	26	202
November	828	16	161
December	646	156	228

GAP 2014 - Customer Count			
Month	Full Payment	Partial Payment	No Payment
January	802	36	243
February	728	30	222
March	960	41	239
April	977	39	172
May	1,316	44	187
June	1,402	61	203
July	1,321	54	259
August	1,533	42	184
September	1,619	39	139
October	1,467	46	130
November	1,278	39	153
December	1,012	36	265

The Commission's September 22, 2010 Order required utilities to report information on customer payment frequency that incorporates partial and late payment information. MERC's customer information system cannot track late payments, so MERC cannot determine this number without reviewing every account, every month manually. However, the charts above incorporate late payments, as full and partial payments, in the months the payments were received. MERC notes a late payment only impacts a customer's GAP status if the customer fails to make a payment or makes a partial payment in one month and then pays the next month's bill late. In such a case, the customer will be defaulted from the Program for failing to make two consecutive monthly payments.

5. Arrearage Level

The table below shows the average account balance at the end of each year for GAP customers, LIHEAP customers not enrolled in GAP, and all MERC residential customers. Account balance is calculated by taking the total arrears per customer class minus the class's total credit balance. Accordingly, a negative number indicates that a class's credit balance exceeded its total arrears. For GAP customers, the table reflects a decrease in the average account balance at the end of 2014. The average account balance for non-GAP LIHEAP

recipients decreased slightly in 2014, most likely because the average LIHEAP benefit increased in 2014 due, in part, to the higher federal funding levels. Arrears for all MERC residential customers increased in 2014, primarily due to higher winter gas bills as a result of a harsh winter.

	Average Arrears (Account Balance) as of December 31, 2012	Average Arrears (Account Balance) as of December 31, 2013	Average Arrears (Account Balance) as of December 31, 2014
MERC GAP Customers	-\$867	-\$374	-\$552
MERC-NMU GAP Customers	-\$895		
MERC-PNG GAP Customers	-\$853		
LIHEAP Customers	\$253	\$267	\$209
MERC Residential Customers	\$113	\$119	\$146

Although MERC successfully unenrolled another 29 customers who had large credit balances in 2014, as noted in Section D.1, there are still a significant number of customers enrolled with large credit balances. These customers continue to be eligible and indicate that they want to continue participating in the Program. Because these customers have large credit balances, they decrease GAP participants' average account balance.

At the end of 2014, MERC had 436 GAP customers with arrears. Their total arrears equaled \$43,863. Therefore, of customers who had an arrears balance, the average arrears balance was approximately \$100 per customer. In 2013, MERC had only 136 GAP customers with arrears balances, which totaled \$13,904. The average arrears balance for these customers was \$102 per customer.

The total arrears for new enrollees increased in 2014. This increase was due to the high number of newly enrolled customers who entered the program with arrears balances. Of the 980 new customers who enrolled in the Program in 2014, 364 customers had arrears. These customers' arrears balances totaled \$35,277 at the time of enrollment. The average arrears balances of customers entering the program decreased between 2013 and 2014.

6. Coordination with Other Available Low-Income Bill Payment Assistance and Conservation Resources

MERC has continued to build its strong partnership with the Salvation Army, which administers the Company's GAP and provides some basic but important additional services to MERC customers in need. MERC Call Center representatives continue to refer customers who have received Minnesota Energy Assistance benefits to the Salvation Army as appropriate for potential program enrollment. MERC and the Salvation Army coordinated several mailing and calling campaigns in 2014, which significantly increased GAP enrollment. The Salvation Army has access to a variety of internal and external programs which it refers individuals to. The external agencies include: Second Harvest, Energy Assistance, County Emergency Assistance, Medical Clinics, the Social Security Administration, the Veterans Administration, Legal Services, Emergency Disaster Services, the Department of Housing and Urban Development, the Federal Emergency Management Agency, St. Vincent de Paul, the Minnesota Housing Authority, and the State's Weatherization Assistance Program. The Salvation Army also refers individuals to MERC's Conservation Improvement Program weatherization and 4U2 (limited income) programs.

Another program that is available through the Salvation Army is HeatShare, which is a state-wide fuel fund for customers who are ineligible for GAP. HeatShare offers direct assistance, budget counseling, and energy conservation education. In an effort to help low income households with the costs of heating, HeatShare works in conjunction with the Energy Assistance program on a statewide and local basis. The Salvation Army is very connected with

the State of Minnesota programs and staff and is a part of the Minnesota Department of Commerce's LIHEAP Policy Advisory Committee and advocates on behalf of the national program. Additionally, the Salvation Army offers food assistance, rent assistance, medical clinics, seasonal and disaster assistance, and many other services for those in need.

MERC has continued to work very closely with the Salvation Army to assure that customers in need receive immediate assistance. The MERC Call Center representatives have continued to increase their referrals to GAP and the Salvation Army's other energy-assistance programs. Through additional training, support, and coaching, MERC's Call Center representatives have become more proactive in encouraging customers to act quickly on their need for assistance instead of waiting until their bill is too big for agencies to help and they are already in the collection process. The Salvation Army assisted about 125 MERC customers with funds from the HeatShare program in 2014, often after determining they were ineligible for GAP. A little more than \$20,000 was provided to this group of customers in 2014, an average of \$160 per customer. The Salvation Army also referred about 350 GAP customers to other assistance programs, including food vouchers, rental assistance, budget counseling, and other Salvation Army services. In 2013, the Salvation Army fielded 2,970 calls for general, application, and enrollment questions. MERC continues to support the HeatShare fund by donating 50 cents for every dollar customers donate. In 2014, MERC customers donated \$34,907, and MERC provided \$17,453 in matching funds to HeatShare.

MERC has regular contact with all of the energy assistance agencies and many community agencies in its service territory. MERC's Manager of Energy Efficiency & Public Benefits, James Phillippo, attempts to communicate with the energy assistance agencies at least a few times each year, having regular contact with many of them throughout the year. Mr. Phillippo also meets with Department and Commission staff several times each year to discuss process improvements, issue resolution, assistance coordination, and strengthening the partnerships with all stakeholders. MERC also continues to work closely with other Investor-

Owned Utility staff to share best practices, discuss partnership opportunities, and to align program practices where appropriate.

MERC also has a specially trained group of customer service staff at its Call Center, known as the “Energy Assistance Team” that works with the agencies on a daily basis to better assist customers and expedite the assistance processes. The team works very closely with the Salvation Army staff to assist in enrolling MERC customers in GAP.

In its December 29, 2011 Order Accepting Gas Affordability Program Reports and Requiring Further Action, the Commission required all natural gas utilities to implement an application-processing goal, assess periodically whether the use of their third-party administrator is the most effective and efficient arrangement, require the third-party administrator to make the GAP application available on their website, provide reminders to GAP participants when payments are missed, and cross-promote GAP with other programs. These requirements are addressed below.

7. Application Processing Goal

MERC has required its GAP administrator, the Salvation Army, to process all completed GAP applications within five business days of receipt. If this deadline cannot be met, due to circumstances beyond its control, the GAP Program Manager must be notified so the issue can be resolved. In the past few years, the Salvation Army has only missed this deadline on a few occasions. The deadline was missed due to incorrect account or household information, which caused the Salvation Army to have difficulty reaching the customer. All situations were resolved quickly. MERC reports that in program year 2014 all applications were processed within 5 business days, with the far majority being processed the same or following day of receipt.

8. Third-Party Administrator Evaluation

MERC and the Salvation Army review GAP-administration performance quarterly. At that time, MERC and the Salvation Army review monthly enrollments, upcoming promotions, the need for additional targeted promotions (mailings, phone calls, etc.), barriers to increasing

participation, and the year-to-date program budget. The Salvation Army has consistently scored very high in MERC's evaluation of their performance. MERC had originally explored the option of managing GAP internally, but it would require adding another full-time employee, which would not be cost-effective compared to the Salvation Army's administration fee. MERC again reviewed the potential to manage the Program internally in 2013, when some organizational changes were being considered for 2014. MERC concluded that it would not be cost-effective for MERC to manage the day-to-day promotion, enrollment, and assistance process internally. Additionally, the Salvation Army's existing contacts with those on a fixed income gives it a significant advantage in referring customers to the Program. Moreover, the Salvation Army's broader network of assistance helps customers' progress toward self-sufficiency. The Salvation Army looks forward to promoting GAP to former Alliant Energy customers when they transition to MERC in the spring of 2015. MERC and the Salvation Army already have plans to do specific promotions to those customers early in the transition period.

9. GAP Application Availability

The Salvation Army, MERC's GAP Program Administrator, was able to successfully add the MERC's GAP application to its website in 2014. The availability of this application on the Salvation Army's website allows customer to use this self-service option, reducing the number of phone calls simply to request a copy of the application. Additionally, the Salvation Army makes exceptional efforts to promote the Program, including by making the GAP application available to its caseworkers, HeatShare, and Outreach staff, which generates many internal referrals and frequently promotes the Program through interactions with other community agencies and programs. The Salvation Army also makes this Program application available at resource fairs they participate in around the state. MERC also continues to have GAP enrollment information and application on its website. The MERC Call Center also mails GAP applications to customers who inquire or are informed of the Program when they are assisting customers with their bills and payment arrangements.

10. Reminder After Missed Payment

MERC sends a letter out to all GAP participants if their payment is not received five days after the due date. The letter reminds them of their GAP payment obligation and that it is not too late to make the payment. However, MERC warns customers that if they miss two consecutive payments, the customer will default from the Program. In 2014, 161 GAP participants defaulted from the Program due to non-payment, which is up from 2013, but not excessive for the number of customers enrolled in 2014.

11. Cross Promotion of GAP

MERC promotes GAP in a variety of ways throughout the year—on its website, through quarterly bill inserts, Customer Connection articles, Call Center contacts, collection contacts and campaigns (including when customers who are in the gas service disconnection process), through promotion/communication to and through the Energy Assistance agencies, and through targeted mailings to Energy Assistance recipients who have not yet participated. The Salvation Army promotes the Program through its other social services programs and through its casework. In 2014, MERC did direct mailing campaigns to customers right before and after the CWR period and MERC plans to promote GAP again to all customers coming off of CWR protection, and to provide a more detailed promotion to a group of about 1,000 customers coming off of CWR protection who have arrears greater than \$500.

G. New Reporting Requirements

In its September 25, 2013 Order Accepting Gas Affordability Program Reports, the Commission required that MERC submit a summary schedule covering the following information:

1. average annual affordability benefit received per customer;
2. average annual arrearage-forgiveness benefit received per customer;
3. percentage of Low Income Home Energy Assistance Program (LIHEAP) customers that participated in GAP;

4. disconnection rates for (a) GAP customers, (b) LIHEAP-Non GAP customers, and (c) non-LIHEAP customers (all firm customers including C&I);
5. number of GAP participants enrolled as of year-end;
6. number of GAP participants enrolled and receiving benefits at some time during the year;
7. annual program budget;
8. actual program revenue;
9. actual program cost;
10. GAP tracker balance as of year-end; and
11. GAP rate-affordability surcharge (\$/therm).

This information is included in the table below and attached as Attachment B.

Average Annual Affordability Benefit per GAP Participant	\$305
Average Annual Arrearage-Forgiveness Benefit per GAP Participant	\$7.31
Percentage of MERC LIHEAP Customers that Participated in GAP	15%
Disconnection Rates	
GAP Customers	2% (39)
LIHEAP Customers	13% (1,713)
All Firm Customers	3% (6,925)
Number of GAP Participants Enrolled as of Year End 2014	1,750
Number of GAP Participants Enrolled and Receiving Benefits at Some Time During 2014	2,060
Annual Program Budget	\$1,000,000
Actual Program Revenue	\$1,457,066.41
Actual Program Cost	\$891,575
GAP Tracker Balance as of Year-End 2014	\$1,106,456.38
GAP Rate-Affordability Surcharge (\$/therm)	\$0.00441/therm

CONCLUSION

MERC respectfully requests that the Commission accept MERC's Annual Report as compliant with MERC's GAP tariff and Commission orders. MERC nearly doubled the number of GAP participants in 2014. MERC believes this success reflects the need for the Program

beyond what LIHEAP offers. In addition to increased participation, MERC helped GAP customers successfully eliminate their pre-Program arrears through participation in the Program and was able to unenroll another 29 successful participants. These customers paid off their arrears and established credit balances on their accounts, giving them a good start towards self-sufficiency. MERC hopes to successfully unenroll more participants in 2015, which will allow more customers to participate in the Program. MERC looks forward to another successful year in 2015.

DATED: March 31, 2015

Respectfully Submitted,

DORSEY & WHITNEY LLP

By /s/ Michael J. Ahern

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Attorney for Minnesota Energy
Resources Corporation

**Minnesota Energy Resources - Total Company
Gas Affordability Program Tracker**

Docket No. G-011/M-15-____
Attachment A

	<i>RT 078 and 179</i>	<i>RT 825</i>	<i>RT 826</i>	<i>RT 044</i>	<i>RT 012</i>	<i>RT 559</i>		
	Dollars Paid for							
	<u>Dollars Paid for</u>	<u>Arrearage</u>	<u>Admin Fee to</u>	<u>12/31/11 Balance</u>	<u>Carry Cost</u>	<u>Ending Balance</u>		
	<u>Beginning Balance</u>	<u>Funding (from bills)</u>	<u>Affordability</u>	<u>Forgiveness</u>	<u>Salvation Army</u>	<u>Amortization</u>		
Jan-14	540,965.04	258,778.15	47,573.12	238.53	-	14,848.33	2,226.66	734,856.55
Feb-14	734,856.55	258,519.96	46,821.11	277.40	-	29,696.66	2,129.84	914,451.50
Mar-14	914,451.50	231,653.59	46,525.60	297.75		-	2,033.03	1,097,248.71
Apr-14	1,097,248.71	153,886.85	46,444.55	171.74		14,848.33	1,936.22	1,187,734.72
May-14	1,187,734.72	100,495.72	49,320.39	355.63		14,848.33	1,839.41	1,221,866.68
Jun-14	1,221,866.68	53,921.13	51,753.93	820.42	25,000.00	14,848.33	1,742.60	1,181,622.53
Jul-14	1,181,622.53	32,641.09	51,062.08	1,768.40		14,848.33	1,645.79	1,144,939.02
Aug-14	1,144,939.02	22,778.68	51,275.55	2,098.22		14,848.33	1,548.98	1,097,946.62
Sep-14	1,097,946.62	29,400.74	51,381.54	1,998.79		14,848.33	1,452.17	1,057,666.53
Oct-14	1,057,666.53	39,198.47	58,429.48	2,008.07		14,848.33	1,355.36	1,020,223.76
Nov-14	1,020,223.76	85,942.64	62,993.36	2,409.39		14,848.33	1,258.54	1,024,656.78
Dec-14	1,024,656.78	189,849.39	64,421.75	2,617.98	25,000.00	14,848.33	1,161.73	1,106,456.38
	<u>1,457,066.41</u>	<u>628,002.46</u>	<u>15,062.32</u>	<u>50,000.00</u>		<u>178,179.96</u>	<u>20,330.33</u>	

12/31/11 Balance moved to a Regualtory Asset Account. Approved to amortize over 4 years

Carry Cost charge set at Rate of Return of 7.8275% as approved by the Commission in Docket No. G-007, 011/GR-10-977

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Actual Program Cost	\$891,575
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GAP Rate-Affordability Surcharge (\$/therm)	\$0.00441/therm

AFFIDAVIT OF SERVICE

STATE OF MINNESOTA)
) ss
COUNTY OF HENNEPIN)

Kristin M. Stastny hereby certifies that on the 31st day of March, 2015, on behalf of Minnesota Energy Resources Corporation (MERC) she electronically filed a true and correct copy of the attached Gas Affordability Program Report on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

/s/ Kristin M. Stastny
Kristin M. Stastny

Subscribed and sworn to before me
This 31st Day of March, 2015.

/s/ Alice Jaworski
Notary Public, State of Minnesota

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