

May 31, 2016

Mr. Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E017/M-16-278

Dear Mr. Wolf:

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

A Request by Otter Tail Power Company (OTP) for approval of the Company's 2015 Conservation Cost Recovery Adjustment and 2015 Electric Demand Side Management Financial Incentive (*Petition*).

The *Petition* was filed on April 1, 2016 by:

Jason Grenier  
Manager, Market Planning  
Otter Tail Power Company  
P.O. Box 496  
215 South Cascade Street  
Fergus Falls, MN 56538-0496

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve** OTP's *Petition* with one adjustment to the billing variances requested as discussed in detail below. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ MICHAEL RYAN  
Rates Analyst

MR/ja  
Attachment

**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

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

**DOCKET No. E017/M-16-278**

**I. SUMMARY OF THE UTILITY'S PROPOSAL**

On April 1, 2016, Otter Tail Power Company (Otter Tail, OTP or the Company) submitted its annual Conservation Improvement Program (CIP) report (*Report or Petition*) for 2015 with the Minnesota Public Utilities Commission (Commission) in Docket No. E017/M-16-278. The *Petition* contains the following sections:

- proposed recoveries and expenditures in the Company's CIP tracker account during 2015;
- proposed Conservation Cost Recovery Adjustment (CCRA) for 2016/2017, and;
- request for approval of a proposed Demand Side Management (DSM) financial incentive of \$4,257,105.

The Company also filed its 2015 CIP Status Report (*Status Report*). The *Status Report* is intended to fulfill the requirements of the Minnesota Department of Commerce, Division of Energy Resources' (Department) annual CIP reporting rules contained in Minnesota Rules part 7690.0550. Since the Company's *Status Report* does not require Commission approval, this portion of the *Petition* has been assigned to a separate docket.<sup>1</sup>

**II. COMMISSION'S 2015 ORDER**

On July 10, 2015, in Docket No. E017/M-15-279, the Commission approved Otter Tail's 2014 Conservation Cost Recovery Adjustment and 2014 Electric Demand Side Management Financial Incentive. The Commission's Order:

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<sup>1</sup> See Docket No. E017/CIP-13-277.02.

1. Approved OTP's 2014 CIP tracker account, resulting in a December 31, 2015 tracker balance of \$5,731,183.
2. Approved an incentive of \$2,957,972 for OTP's 2014 CIP achievements.
3. Approved a CCRA factor of \$0.00287/kWh with an effective date of October 1, 2015.
4. Granted OTP a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 for one year after the issue date of this Order.
5. Required OTP to submit a compliance filing, within 10 days of the issue date of this Order, with revised tariff sheets reflecting the Commission's determinations in this matter.

The Company filed compliance on July 24, 2016 to fulfill the Commission's order.

### III. DEPARTMENT ANALYSIS

The Department's analysis of Otter Tail's *Petition* is provided below in the following sections:

- in Section II.A, Otter Tail's proposed 2015 DSM financial incentive;
- in Section II.B, Otter Tail's proposed reconciliation for the 2015 CIP Tracker Account;
- in Section II.C, Otter Tail's proposed 2015 CCRA for 2016/2017;
- in Section II.D, OTP's request for a waiver from Minnesota Rules part 7820.3500 (E) and (K) ; and
- in Section II.E, Otter Tail's historical CIP achievements and incentives.

#### A. OTTER TAIL'S PROPOSED FINANCIAL INCENTIVE FOR 2015

##### 1. *Background and Summary of Otter Tail's Proposed 2015 DSM Incentive*

The Shared Savings DSM financial incentive plan was approved by the Commission in Docket No. E,G999/CI-08-133 on January 27, 2010. On December 20, 2012 the Commission issued its *Order Adopting Modifications to Shared Savings Demand Side Management Financial Incentives* (Modification Order). The Shared Savings approach emphasizes a 1.5 percent energy savings goal, and ties the incentive earned by the utility to pursuit of the 1.5 percent savings goal. The incentive mechanism sets a specific dollar amount per unit of energy saved that each utility will earn at energy savings equal to 1.5 percent of annual non-CIP-exempt retail sales. That dollar amount is referred to as the incentive calibration. The higher the calibration, the higher the incentive will be at all energy savings levels after the threshold. Specifically, each electric utility's incentive is calibrated so that when the utility achieves energy savings equal to 1.5 percent of retail sales, electric

utilities will earn an incentive equal to \$0.07 per kWh saved and gas utilities will earn \$9 per thousand cubic feet (Mcf) saved. The Commission's Modification Order stated, in part:

*The Commission hereby adopts the Department's proposal for the continuation of the new shared savings financial incentive with the following:*

- A. A threshold set at half of the utility's average achievements from 2007 to 2011 for utilities with triennial CIPs beginning in 2013, removing both the maximum and minimum achievements, or at 0.4 percent of retail sales, whichever is lowest. For utilities with triennial Conservation Improvement Programs beginning in 2014, the threshold shall be set at half of the utility's average achievements from 2008 to 2012, removing both the maximum and minimum achievements, or at 0.4 percent of retail sales, whichever is lowest.
- B. The calibration at 1.5 percent of retail sales for each utility set as follows: (1) \$9.00 per Mcf for natural gas utilities, and (2) \$0.07 per kWh for electric utilities.
- C. A utility may not modify its incentive to correct for non-linear benefits.
- D. The incentive shall be capped at 20 percent of net benefits for all utilities except for Minnesota Power. The Commission will defer a decision on the application of the 20 percent cap of net benefits for Minnesota Power until 2013 to allow for the consideration of updated avoided cost information for this utility.
- E. The existing cap of 125 percent of a utility's 1.5 percent calibration level for the electric utilities (\$0.0875 per kWh) and a cap of 125 percent of the 1.0 percent target calibration for gas utilities (\$6.875) per Mcf are continued.
- F. The percentage of net benefits to be awarded to each utility at different energy savings levels will be set at the beginning of each year.
- G. The CIP-Exempt Class shall not be allocated costs for the new shared savings incentive. Sales to the CIP-Exempt Class shall not be included in the calculation of utility energy savings goals.
- H. If a utility elects not to include a third-party CIP project, the utility cannot change its election until the beginning of subsequent years.
- I. If a utility elects to include a third-party project, the project's net benefits and savings will be included in calculation of

the percentage of net benefits awarded at specific energy savings levels (calculated before the CIP year begins) and in the post CIP year calculations of net benefits and energy savings achieved and incentive awarded. In any case, the energy savings will count toward the 1.5 percent savings goal.

- J. The energy savings, costs, and benefits of modifications to non-third-party projects will be included in the calculation of a utility's DSM incentive, but will not change the percent of net benefits awarded at different energy savings levels.
- K. The costs of any mandated, non-third-party projects (e.g., Next Generation Energy Act assessment, University of Minnesota Institute for Renewable Energy and the Environment costs) shall be excluded from the calculation of net benefits awarded at specific energy savings levels (calculated before the CIP year begins) and in the post-CIP year calculations of net benefits and energy savings achieved and incentive awarded.
- L. Costs, energy savings, and energy production from Electric Utility Infrastructure Projects (EUIC), solar installation and biomethane purchases shall not be included in energy savings for DSM financial incentive purposes.
- M. The Department shall file a recommendation with the Commission on the application of a net benefits cap for Minnesota Power's incentive by October 1, 2013. The recommendation should be filed in Docket No. E,G-999/CI-08-133.
- N. No adjustment will be made at this time to the calibration of the incentive mechanism for utilities that have Commission-approved decoupling mechanisms.
- O. The new shared savings DSM incentive shall be in operation for the length of each utility's triennial CIP plan.

Otter Tail estimated that its 2015 achievements resulted in \$38,079,065 of net benefits. Otter Tail also stated in its *Petition* that its CIP activities achieved energy savings in 2015 of 48,652,628 kWh, which is approximately 2.33 percent of Otter Tail's weather normalized, non-CIP-exempt retail sales of 2,091,441,300 kWh. Based on the terms and conditions of its approved DSM incentive plan, Otter Tail requested recovery of a DSM financial incentive of \$4,257,105 for 2015, which is approximately 70 percent ( $\$4,257,105/\$6,105,445$ ) of the Company's 2015 CIP actual expenditures.

2. *The Department's Review of Otter Tail's Proposed 2015 DSM Incentive*

Otter Tail estimated that its 2015 performance should result in a Shared Savings DSM financial incentive of \$4,257,105.

The Department's engineering-oriented analysis of the demand and energy savings that underpin Otter Tail's proposed 2015 DSM financial incentive of \$4,257,105 is ongoing. This analysis may not be completed before the fall of 2016. The existence of this lag between the Company's request for recovery of the incentive and the completion of the DOC's engineering review is a recurring phenomenon.

In 2015, the Department compensated for this lag by simply assuming OTP's claimed energy savings for 2014 were correct as filed and planned to make in the instant filing any adjustments approved by the Deputy Commissioner of the Department. However, the Deputy Commissioner approved Otter Tail's 2015 Status Report, covering 2014 CIP activity, without any adjustments in Docket No. E017/CIP-13-277.01, and thus none need to be made this year.

In the event that the Deputy Commissioner of the Department approves a different 2015 CIP energy savings or budget, the Commission can approve any adjustments to the Company's DSM financial incentive for 2015 achievements as part of the Company's 2016 filing, which will be made March 31, 2017.

B. *OTTER TAIL'S PROPOSED 2015 CIP TRACKER ACCOUNT*

In its *Petition*, Otter Tail requested approval of its report on recoveries and expenditures included in the Company's CIP tracker account balance during 2015. Activity in Otter Tail's CIP tracker account during 2015 is summarized below in Table 1.

**Table 1: A Summary of OTP's 2015 CIP Tracker Account**

Description	Time Period	Amount
Beginning Balance	December 31, 2014	\$5,731,183
CIP Expenses	January 1 through December 31, 2015	\$ 6,105,445
DSM Financial Incentive	Approved in 2015 for 2014	\$2,957,972
Carrying Charges	January 1 through December 31, 2015	\$31,473
Combined Base Rate and CCRA Recovery	January 1 through December 31, 2015	(\$10,493,011)
Ending Balance	December 31, 2015	\$4,333,061

The Department reviewed Otter Tail's CIP Tracker account and concludes that the Company correctly calculated its CIP tracker account for 2015. The Department recommends that the Commission approve Otter Tail's 2015 CIP Tracker account as summarized in Table 1.

**C. OTTER TAIL'S PROPOSED UPDATED CIP RIDER AND CCRA**

OTP's approved CCRA (CIP adjustment rate) is \$0.00287 per kWh, as approved by the Commission on September 26, 2014 in Docket No. E017/M-14-201. For October 2016 through September 2017, Otter Tail proposed a decrease in the surcharge to \$0.00275/kWh or a decrease of approximately 4 percent from the Company's current surcharge.

Otter Tail's proposal would reduce the Company's under-recovered CIP tracker balance by \$3,241,589 to \$0 by September 30, 2017. OTP estimated that this rate decrease will reduce an average residential customer's bill by \$0.10/month. The Company estimated that the carrying costs associated with this proposal for the October 1, 2016 through September 30, 2017 time period would be equal to \$6,988. Table 2 below delineates the Company's estimate.

**Table 2: OTP's Forecasted 2016-2017 CIP Tracker Account**

Line No.	Description	Time Period	Amount
1.	Beginning Balance	October 1, 2016	\$3,241,589
2.	CIP Program Expenses	October 1, 2016 - September 30, 2017	\$5,999,921
3.	CIP Incentive	Forecasted 2016 incentive that would be approved in 2017 <sup>2</sup>	\$2,327,976
4.	Carrying Charges	October 1, 2016 - September 30, 2017	\$6,988
5.	CIP Expenses Subtotal (Line 1 + Line 2 + Line 3 + Line 4)	As of September 30, 2017	\$11,576,474
6.	Conservation Cost Recovery Charge -Included in Base Rates	October 1, 2016 - September 30, 2017	(\$4,454,003)
7.	CCRA	October 1, 2016 - September 30, 2017	(\$7,122,471)
8.	CIP Revenues Subtotal (Line 6 + Line 7)	As of September 30, 2017	(\$11,576,474)
9.	Ending Balance (Line 8 - Line 5)	As of September 30, 2017	\$0

<sup>2</sup> This forecasted incentive for 2016 CIP achievements should not be confused with OTP's proposed incentive of \$4,257,105 for 2015 CIP achievements that Otter Tail proposed in its *Petition*.

Historically, the Department has taken the position that a utility's CIP tracker balance should be managed such that it remains as close to a zero balance (neither under- or over-recovered) as possible.<sup>3</sup> The information in Table 2 suggests that the Company's proposed CCRA and cost recovery approach would provide an adequate amount of revenue to offset the Company's current under-recovered CIP Tracker Account balance of \$3.24 million. The Department recommends that the Commission approve OTP's 2016/2017 CCRA if \$0.00275 per kWh.

*D. OTP'S ANNUAL REQUEST FOR VARIANCES FROM COMMISSION RULES*

Otter Tail requested two rule variances:

- a variance from Minnesota Rules part 7820.3500 (E), which requires bill itemization of all charges incurred at each level of customer usage ; and
- a variance from Minnesota Rules part 7820.3500 (K), which requires the fuel clause adjustment to be listed on customers' bills as a separate line item.

OTP requested a variance of these two rules so that the Company may calculate the CIP adjustment rate as a percent of customers' bills, and combine the FCA and CIP adjustment rate on one bill line-item called a "Resource Adjustment."

OTP stated that "as in prior years, Otter Tail is requesting a variance to Minnesota Rule 7820.3500 (E & K), which require that the Fuel Clause Adjustment ("FCA") be stated as a separate line item on customer bills. The requested variance would allow the Company to continue to combine the FCA with the CCRA on customer bills."<sup>4</sup>

The Department notes that in prior orders for Otter Tail's CCRA and DSM Financial Incentive filings,<sup>5</sup> OTP has requested and the Commission has granted variances to Minnesota Rules 7820.3500 (K) and 7825.2600, but not Minnesota Rules 7820.3500 (E). Given that the prior orders have been sufficient to allow OTP to calculate the CIP adjustment rate as a percent of customers' bills and combine the FCA and CIP adjustment as a "Resource Adjustment" on the billing form, the Department recommends that the Commission instead approve the following variances:

- a variance from Minnesota Rules part 7820.3500 (K), which requires the fuel clause adjustment to be listed on customers' bills as a separate line item; and

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<sup>3</sup> One reason for this position is the Department's goal to minimize the carrying costs associated with the current balance contained the CIP Tracker Account.

<sup>4</sup> Petition pg. 2

<sup>5</sup> E017/M-14-201 & E017/M-15-279



- a variance from Minnesota Rules part 7825.2600, which states that the FCA should be stated on a per-kWh basis on customer bills.

Minnesota Rules part 7829.3200 authorizes the Commission to grant a variance to its rules when:

- enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;
- granting the variance would not adversely affect the public interest; and
- granting the variance would not conflict with standards imposed by law.

With respect to the first rule requirement, Otter Tail stated that the Company has been combining its FCA and CIP Rider as a Resource Adjustment line item on customers' bills since July 1995, and that customers have become familiar with the single-line item on their bills. With respect to the second rule requirement, Otter Tail stated that continuation of the variances would not adversely affect the public interest and may avoid customer confusion if the presentation of customers' bills were altered at this time. With respect to the third rule requirement, Otter Tail stated that there are no statutory provisions that would prohibit the Commission from granting the variance.

Based on its review of the Company's rationale for the proposed variances, the Department concludes that Otter Tail has met the conditions set forth in Minnesota Rules part 7829.3200 for the Commission to grant the requested variances. Thus, the Department recommends that the Commission grant Otter Tail's proposed variances to Minnesota Rules part 7820.3500 (K) and Minnesota Rules part 7825.2600 for one year after issue date of the Commission's *Order* in the present docket.

#### *E. HISTORY OF OTTER TAIL'S CIP ACHIEVEMENTS AND FINANCIAL INCENTIVES*

The Department has included a summary of historical and forecasted CIP-related information for Otter Tail in Attachment A. The information in Attachment A provides summary information for the period from 2007 through 2015. In addition, the Department developed Table 3 below, reproduced from OTP's Petition that summarizes the Company's DSM financial incentives, CIP expenditures, reported energy savings and first year average cost per kWh saved between 2012 and 2015

As indicated in Table 3, Otter Tail's 2015 energy savings have risen considerably since 2014. Otter Tail's 2015 average cost per kWh saved has dropped below the cost for each year estimated since 2012.

**Table 3: Selected Summary Statistics for OTP's CIP Program (2012-2015)**

Description	2012	2013	2014	2015
DSM Financial Incentive	\$2,681,575	\$4,026,600	\$2,957,972	\$4,257,105
CIP Expenditures	\$4,816,994	\$5,259,625	\$5,188,931	\$6,105,445
Achieved Energy Savings (kWh)	30,793,654	35,792,002	33,805,392	48,652,628
Average Cost per kWh Saved	\$0.16	\$0.15	\$0.15	\$0.13

The information included in Attachment A and Table 3 demonstrate that Otter Tail's CIP efforts have been very successful to date.

#### **IV. THE DEPARTMENT'S RECOMMENDATIONS**

Based on the analysis provided above, the Department recommends that the Commission:

1. approve Otter Tail's 2015 CIP tracker account, as summarized in Table 1 above, resulting in a December 31, 2015 tracker balance of \$4,333,061;
2. approve an incentive of \$4,257,105 for Otter Tail's 2015 CIP achievements;
3. approve a CCRA factor of \$0.00275/kWh with an effective date of October 1, 2016;
4. grant Otter Tail a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 for one year after the issue date of the Commission's *Order* in the present docket; and
5. require Otter Tail to submit a compliance filing, within 10 days of the issue date of the *Order* in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

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**Otter Tail Power's Historical CIP Achievements, Incentives, and Tracker Balance  
2007-2015**

Line No.		2007	2008	2009	2010	2011	2012	2013	2014	2015
1.	Achieved Energy Savings (kWh)	11,468,831	15,994,719	35,706,319	31,792,750	27,957,635	30,793,654	35,792,002	33,805,392	48,652,628
2.	CIP Expenditures	\$1,862,697	\$2,345,874	\$4,093,050	\$5,030,119	\$4,344,581	\$4,816,994	\$5,253,935	\$5,188,931	\$6,105,445
3.	Net Benefits	\$6,860,618	\$9,891,448	\$35,624,398	\$28,444,292	\$19,307,820	\$21,167,988	\$32,764,856	\$26,035,459	\$38,079,065
4.	DSM Financial Incentive	\$25,066	\$273,798	\$1,101,060	\$3,531,538	\$2,608,098	\$2,681,575	\$4,026,600	\$2,957,972	\$4,257,105
5.	Carrying Charges	\$53,025	-\$4,830	\$26,437	\$146,441	\$221,862	\$222,097	\$237,859	\$219,788	\$31,473
6.	Year-End Tracker Balance	\$490,713	\$265,056	\$1,927,314	\$3,721,665	\$5,188,129	\$3,572,621	\$4,835,558	\$5,731,183	\$4,333,061
7.	Average Cost per first year kWh Saved	\$0.162	\$0.147	\$0.115	\$0.158	\$0.155	\$0.156	\$0.147	\$0.153	\$0.125
8.	Average cost per kWh Saved (including incentives)	\$0.165	\$0.164	\$0.145	\$0.269	\$0.249	\$0.244	\$0.259	\$0.241	\$0.213
9.	Incentive as a % of CIP Expenditures	1%	12%	27%	70%	60%	56%	77%	57%	70%
10.	Incentive as a % of Net Benefits	0%	3%	3%	12%	14%	13%	12%	11%	11%
11.	Incentive per first year kWh saved	\$0.002	\$0.017	\$0.031	\$0.111	\$0.093	\$0.087	\$0.112	\$0.088	\$0.088
12.	Carrying Charges as a % of Expenditures	3%	0%	1%	3%	5%	5%	5%	4%	1%
13.	Year-End Tracker Balance as a % of Expenditures	26%	11%	47%	74%	119%	74%	92%	111%	71%

## **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. E017/M-16-278**

**Dated this 31<sup>st</sup> day of May 2016**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500  Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_16-278_M-16-278
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_16-278_M-16-278
John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance	1313 5th St SE Ste 303  Minneapolis, MN 55414	Electronic Service	No	OFF_SL_16-278_M-16-278
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_16-278_M-16-278
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_16-278_M-16-278
Mathias	Bell	mathias.bell@opower.com	Opower	1515 N Courthouse Rd  Arlington, VA 22201	Electronic Service	No	OFF_SL_16-278_M-16-278
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	OFF_SL_16-278_M-16-278
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-278_M-16-278
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_16-278_M-16-278
Charlie	Buck	charlie.buck@opower.com	Opower	760 Market Street, Fourth Floor  San Francisco, California 94102	Electronic Service	No	OFF_SL_16-278_M-16-278

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_16-278_M-16-278
Gary	Connett	gconnett@greenergy.com	Great River Energy	12300 Elm Creek Blvd N  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_16-278_M-16-278
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_16-278_M-16-278
Jill	Curran	jcurran@mnchamber.com	Minnesota Waste Wise	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_16-278_M-16-278
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206  St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_16-278_M-16-278
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-278_M-16-278
Executive	Director	N/A	Sustainable Resources Center	1081 10th Ave SE  Minneapolis, MN 55414	Paper Service	No	OFF_SL_16-278_M-16-278
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400  Plymouth, MN 554475142	Electronic Service	No	OFF_SL_16-278_M-16-278
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600  Edina, MN 55435	Electronic Service	No	OFF_SL_16-278_M-16-278
Chris	Duffrin	chrisd@thenec.org	Neighborhood Energy Connection	624 Selby Avenue  St. Paul, MN 55104	Electronic Service	No	OFF_SL_16-278_M-16-278

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St  St. Paul, MN 55106	Electronic Service	No	OFF_SL_16-278_M-16-278
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl  Northfield, MN 55057	Electronic Service	No	OFF_SL_16-278_M-16-278
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-278_M-16-278
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_16-278_M-16-278
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_16-278_M-16-278
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-278_M-16-278
Kelsey	Genung	kelsey.genung@xcelenergy.com	Xcel Energy	414 Nicollet Mall, Fl. 6  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-278_M-16-278
Angela E.	Gordon	angela.e.gordon@lmco.com	Lockheed Martin	1000 Clark Ave.  St. Louis, MO 63102	Electronic Service	No	OFF_SL_16-278_M-16-278
Lara V	Greden	N/A	The Weidt Group	5800 Baker Rd  Minnetonka, MN 55345	Paper Service	No	OFF_SL_16-278_M-16-278
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	OFF_SL_16-278_M-16-278

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_16-278_M-16-278
Stephan	Gunn	sgunn@appliedenergygroup.com	Applied Energy Group	1941 Pike Ln  De Pere, WI 54115	Electronic Service	No	OFF_SL_16-278_M-16-278
Jeffrey	Haase	jhaase@greenergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-278_M-16-278
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_16-278_M-16-278
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-278_M-16-278
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE  Rochester, MN 55906	Electronic Service	No	OFF_SL_16-278_M-16-278
Norm	Harold	N/A	NKS Consulting	5591 E 180th St  Prior Lake, MN 55372	Paper Service	No	OFF_SL_16-278_M-16-278
Jared	Hendricks	hendricksj@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_16-278_M-16-278
Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 7th Floor  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-278_M-16-278
Karolanne	Hoffman	kmh@dairy.net	Dairyland Power Cooperative	PO Box 817  La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_16-278_M-16-278



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Randy	Hoffman	rhoffman@eastriver.coop	East River Electric Power Coop	121 SE 1st St PO Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_16-278_M-16-278
Tom	Holt	tholt@eastriver.coop	East River Electric Power Coop., Inc.	PO Box 227  Madison, SD 57042	Electronic Service	No	OFF_SL_16-278_M-16-278
Jim	Horan	Jim@MREA.org	Minnesota Rural Electric Association	11640 73rd Ave N  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_16-278_M-16-278
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_16-278_M-16-278
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S  Virginia, MN 55792	Electronic Service	No	OFF_SL_16-278_M-16-278
Joel W.	Kanvik	joel.kanvik@enbridge.com	Enbridge Energy LLC	4628 Mike Colalillo Dr  Duluth, MN 55807	Electronic Service	No	OFF_SL_16-278_M-16-278
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_16-278_M-16-278
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_16-278_M-16-278
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE  Austin, MN 55912	Electronic Service	No	OFF_SL_16-278_M-16-278
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_16-278_M-16-278

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave  Virginia, MN 55792	Electronic Service	No	OFF_SL_16-278_M-16-278
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_16-278_M-16-278
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-278_M-16-278
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_16-278_M-16-278
Samuel	Mason	smason@beltramelectric.com	Beltrami Electric Cooperative, Inc.	4111 Technology Dr. NW PO Box 488 Bemidji, MN 56619-0488	Electronic Service	No	OFF_SL_16-278_M-16-278
Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	OFF_SL_16-278_M-16-278
Tom	McDougall	N/A	The Weidt Group	5800 Baker Rd  Minnetonka, MN 55345	Paper Service	No	OFF_SL_16-278_M-16-278
John	McWilliams	jmm@dairy.net	Dairyland Power Cooperative	3200 East Ave SPO Box 817  La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_16-278_M-16-278
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-278_M-16-278
Craig	Metz	N/A	EnSave Energy Performance	65 Millet St, Suite 105  Richmond, VT 05477	Paper Service	No	OFF_SL_16-278_M-16-278

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David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_16-278_M-16-278
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_16-278_M-16-278
Gary	Myers	garym@hpuc.com	Hibbing Public Utilities	PO Box 249  Hibbing, MN 55746	Electronic Service	No	OFF_SL_16-278_M-16-278
Susan K	Nathan	snathan@appliedenergygroup.com	Applied Energy Group	2215 NE 107th Ter  Kansas City, MO 64155-8513	Electronic Service	No	OFF_SL_16-278_M-16-278
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_16-278_M-16-278
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_16-278_M-16-278
Gary	Oetken	goetken@agp.com	Ag Processing, Inc.	12700 West Dodge Road P.O. Box 2047 Omaha, NE 681032047	Electronic Service	No	OFF_SL_16-278_M-16-278
Paul	Ohlson	N/A	EnSave Energy Performance	65 Millet Street, Suite 105  Richmond, VT 05477	Paper Service	No	OFF_SL_16-278_M-16-278
Larry	Oswald		Honeywell, Inc.	1335 2nd Ave N Ste B  Fargo, ND 58103	Paper Service	No	OFF_SL_16-278_M-16-278
Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy	800 Lasalle Avenue - 14th Floor  Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-278_M-16-278

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	OFF_SL_16-278_M-16-278
Bill	Poppert		Technology North	2433 Highwood Ave  St. Paul, MN 55119	Paper Service	No	OFF_SL_16-278_M-16-278
Michael	Reinertson	michael.reinertson@avante nergy.com	Avant Energy	220 S. Sixth St. Ste 1300  Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-278_M-16-278
Dave	Reinke	dreinke@dakotaelectric.co m	Dakota Electric Association	4300 220th St W  Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_16-278_M-16-278
Richard	Savelkoul	rsavelkoul@martinsquires.c om	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-278_M-16-278
Bruce	Sayler	bruces@connexusenergy.c om	Connexus Energy	14601 Ramsey Boulevard  Ransey, MN 55303	Electronic Service	No	OFF_SL_16-278_M-16-278
Christopher	Schoenherr	cp.schoenherr@smmpa.or g	SMMPA	500 First Ave SW  Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_16-278_M-16-278
Cindy	Schweitzer Rott	cindy.schweitzer@clearesu lt.com	CLEARResult's	S12637A Merrilee Rd.  Spring Green, WI 53588	Electronic Service	No	OFF_SL_16-278_M-16-278
Anna	Sherman	anna.sherman@centerpoin tenergy.com	CenterPoint Energy	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55459	Electronic Service	No	OFF_SL_16-278_M-16-278
Ken	Smith	ken.smith@districtenergy.c om	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_16-278_M-16-278

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Grey	Staples	gstaples@mendotagroup.com	The Mendota Group LLC	1830 Fargo Lane  Mendota Heights, MN 55118	Electronic Service	No	OFF_SL_16-278_M-16-278
Leo	Steidel	N/A	The Weidt Group	5800 Baker Rd  Minnetonka, MN 55345	Paper Service	No	OFF_SL_16-278_M-16-278
Leo	Steidel	lsteidel@energyplatforms.com	Energy Platforms	8170 Old Carriage Court N Ste 200  Shakopee, MN 55379	Paper Service	No	OFF_SL_16-278_M-16-278
Richard	Szydlowski	rszydlowski@mncee.org	Center for Energy & Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401-1459	Electronic Service	No	OFF_SL_16-278_M-16-278
SaGonna	Thompson	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_16-278_M-16-278
Steve	Tomac	stomac@becp.com	Basin Electric Power Cooperative	1717 E Interstate Ave  Bismarck, ND 58501	Electronic Service	No	OFF_SL_16-278_M-16-278
Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_16-278_M-16-278
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St  Shakopee, MN 55379	Electronic Service	No	OFF_SL_16-278_M-16-278
Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800  Owatonna, MN 55060	Electronic Service	No	OFF_SL_16-278_M-16-278
Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_16-278_M-16-278

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_16-278_M-16-278
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_16-278_M-16-278

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Mathias	Bell	mathias.bell@opower.com	Opower	1515 N Courthouse Rd  Arlington, VA 22201	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Gary	Connett	gconnett@grenergy.com	Great River Energy	12300 Elm Creek Blvd N  Maple Grove, MN 553694718	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Jill	Curran	jcurran@mchamber.com	Minnesota Waste Wise	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206  St. Paul, Minnesota 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400  Plymouth, MN 554475142	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600  Edina, MN 55435	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Chris	Duffrin	chrisd@thenec.org	Neighborhood Energy Connection	624 Selby Avenue  St. Paul, MN 55104	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St  St. Paul, MN 55106	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl  Northfield, MN 55057	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Angela E.	Gordon	angela.e.gordon@lmco.com	Lockheed Martin	1000 Clark Ave.  St. Louis, MO 63102	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Jason	Grenier	jpgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Stephan	Gunn	sgunn@appliedenergygroup.com	Applied Energy Group	1941 Pike Ln  De Pere, WI 54115	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Tony	Hainault	anthony.hainault@co.hennepin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE  Rochester, MN 55906	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Norm	Harold	N/A	NKS Consulting	5591 E 180th St  Prior Lake, MN 55372	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Jared	Hendricks	hendricksj@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Randy	Hoffman	rhoffman@eastriver.coop	East River Electric Power Coop	121 SE 1st St PO Box 227 Madison, SD 57042	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Karolanne	Hoffman	kmh@dairyland.net	Dairyland Power Cooperative	PO Box 817  La Crosse, WI 54602-0817	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tom	Holt	tholt@eastriver.coop	East River Electric Power Coop., Inc.	PO Box 227 Madison, SD 57042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jim	Horan	Jim@MREA.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Joel W.	Kanvik	joel.kanvik@enbridge.com	Enbridge Energy LLC	4628 Mike Colalillo Dr Duluth, MN 55807	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE Austin, MN 55912	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Martin	Lepak	Martin.Lepak@aeoa.org	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Scott	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
John	McWilliams	jmm@dairy.net	Dairyland Power Cooperative	3200 East Ave SPO Box 817  La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Brian	Meloy	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300  Minneapolis, MN 55402	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Gary	Myers	garym@hpuc.com	Hibbing Public Utilities	PO Box 249  Hibbing, MN 55746	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Susan K	Nathan	snathan@appliedenergygroup.com	Applied Energy Group	2215 NE 107th Ter  Kansas City, MO 64155-8513	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

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Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Gary	Oetken	goetken@agp.com	Ag Processing, Inc.	12700 West Dodge Road P.O. Box 2047 Omaha, NE 681032047	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy	800 Lasalle Avenue - 14th Floor  Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Bill	Poppert		Technology North	2433 Highwood Ave  St. Paul, MN 55119	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024-9583	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW  Rochester, MN 55902-3303	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Cindy	Schweitzer Rott	cindy.schweitzer@clearesult.com	CLEAResult's	S12637A Merrilee Rd.  Spring Green, WI 53588	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Anna	Sherman	anna.sherman@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall PO Box 59038 Minneapolis, MN 55459	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

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Leo	Steidel	N/A	The Weidt Group	5800 Baker Rd  Minnetonka, MN 55345	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Richard	Szydlowski	rszydlowski@mncee.org	Center for Energy & Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401-1459	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
SaGonna	Thompson	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Steve	Tomac	stomac@bepc.com	Basin Electric Power Cooperative	1717 E Interstate Ave  Bismarck, ND 58501	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Sharon N.	Walsh	swalsh@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St  Shakopee, MN 55379	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST