



AN ALLETE COMPANY

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July 12, 2017

VIA ELECTRONIC FILING

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of Minnesota Power's Application for
Approval of its 2015-2029 Resource Plan
Docket No. E015/RP-15-690

Dear Dr. Wolf:

Minnesota Power hereby submits its Reply Comments in the above-referenced Docket.

If you have any questions regarding this letter, please do not hesitate to contact me at the number above.

Yours truly,

A handwritten signature in black ink that reads 'David R. Moeller'.

David R. Moeller

DRM:sr
Attach.

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of Minnesota Power’s Request for
Extension to File its Next Resource Plan to Address
Wind, Solar, and Gas Resource Package

Docket No. E015/RP-15-690

**MINNESOTA POWER’S
REPLY COMMENTS**

I. OVERVIEW

Minnesota Power (or the “Company”) submits these Reply Comments to the Minnesota Public Utilities Commission (“Commission”) in response to the Department of Commerce – Division of Energy Resources (“Department”), Clean Energy Organizations (“CEOs”), and the Large Power Intervenors Group (“LPI”) who each filed Initial Comments on June 30, 2017. In these Reply Comments, Minnesota Power provides additional support for delay of the next Integrated Resource Plan (“IRP”) to be filed by the Company and agrees to October 2019 as an appropriate timeframe; responds to the parties regarding the need for a contested case proceeding; and addresses why it is critical to consider the Company’s proposed resource additions in a single proceeding.

By way of background, the Commission issued its Order Approving Resource Plan with Modifications in the above-referenced docket on July 18, 2016 (“July 2016 IRP Order”). In the July 2016 IRP Order, the Commission directed the Company to add wind and solar generation resources and to explore adding dispatchable natural gas capacity to the system (the “*EnergyForward* Resource Package”). On June 7, 2017, the Company announced that it had developed the *EnergyForward* Resource Package in compliance with the July 2016 IRP Order and based on additional exploration of resource options since the Order was issued.¹ On June 8, 2017, Minnesota Power filed with the Commission a request to approve an extension for the Company’s submittal of its next IRP filing from February 1, 2018 to approximately February 2019 (or later, as dictated by the Commission’s overall schedule and workload), as the *EnergyForward* Resource Package will be under active consideration and it may be unknown

¹ “Minnesota Power Proposes Next Step in *EnergyForward* Plan: Wind, solar and natural gas package will increase company’s renewable mix, reduce carbon and preserve reliability for customers,” *available online at* <http://www.businesswire.com/news/home/20170607005334/en/>.

whether and to what extent the results of that package proposal can be integrated into the Company's next IRP. Minnesota Power also communicated that it would be requesting referral of the forthcoming *EnergyForward* Resource Package filing to the Office of Administrative Hearings for a contested case proceeding to allow full development of a record for consideration of the important resource acquisition issues that will be fundamental to evaluating the Company's Petition. On June 13, 2017, the Commission issued a Notice of Comment Period on the following topics:

- Should the Commission grant Minnesota Power's Extension Request? Is the proposed extension of at least one year reasonable, or should the Commission consider an alternative date?
- Is Minnesota Power's proposed process reasonable? Do the parties have sufficient information at this time regarding MP's *EnergyForward* Resource Package to determine whether an IRP extension or a contested case is necessary?
- Given that MP's *EnergyForward* Resource Package includes several types of resources, is it necessary to evaluate the entire package at once, or should the wind, solar, and natural gas resources be evaluated individually as part of separate proceedings?
- Any other related issues or concerns.

Minnesota Power appreciates the time and work by the Department, CEOs, and LPI to develop Initial Comments that convey their respective viewpoints consistent with prior resource plans and resource additions. Through these Reply Comments, Minnesota Power provides further justification for why Commission approval of an extension for submitting its next IRP, referral of the *EnergyForward* Resource Package to the Office of Administrative Hearings, and maintenance of a resource package approach to the regulatory review process are appropriate outcomes in the best interest of all stakeholders. The Company is proud of its thoughtfully designed *EnergyForward* Resource Package which, if implemented as proposed, will bring Minnesota Power's renewable energy resources to 44 percent of its overall energy portfolio while reducing carbon emissions by 40 percent, and looks forward to a productive format for its evaluation.

II. REPLY COMMENTS

The *EnergyForward* Resource Package has three main components: (i) 250 MW of wind generation located in southwestern Minnesota to be in service by 2020 pursuant to a power purchase agreement with Tenaska; (ii) 10 MW of solar generation located near Royalton, Minnesota in Minnesota Power's service territory to be in service by 2019 pursuant to a power purchase agreement with Cypress Creek Renewables; and (iii) partnering with Dairyland Power Cooperative to build a combined-cycle natural gas power plant in Superior, Wisconsin, to be in service by 2025, of which approximately 250 MW of the jointly owned facility will be dedicated to Minnesota Power. Minnesota Power's dedicated energy will come from a share of the natural gas plant owned by an affiliate and be dedicated on the same basis as if the asset was directly owned by the utility. Minnesota Power's need for wind, solar, and natural gas resources was identified as part of the Company's least-cost power supply plan in its 2015 IRP and was thoroughly analyzed as part of the 2015 IRP regulatory review process. The forthcoming *EnergyForward* Resource Package petition is supplemental to the 2015 IRP and is best reviewed through the structure of a contested case proceeding.

Request to Review Resources as a Package

Minnesota Power is seeking approval of its proposed wind, solar, and combined cycle natural gas resources as a package because the Company's analysis identified that in this specific combination, these resources best serve customers' long-term capacity and energy needs. The uniqueness of Minnesota Power's system requires a reliable resource with baseload-type characteristics that can be called on 24/7 to serve the needs of the Company's energy-intensive industrial customers. This resource also serves a dual purpose as backup to increasing amounts of renewable resources on the Company's system. With the proposed wind and solar projects, 44 percent of the company's energy supply will come from renewable resources by 2025, which represents dramatic and significant efforts to decarbonize the system, which was 95 percent coal in 2005. In light of these factors, it is important to consider specific wind and solar generation proposals while simultaneously considering the need for dispatchable capacity to support these resources and replace baseload capacity retiring from Minnesota Power's system. Considering the resources together does not require any particular decision from the Commission, but rather provides a more fulsome evaluation that permits more informed and contextual determinations.

Further, based on Minnesota Power's unique customer mix and resulting system needs, the Company's analysis has demonstrated it would not be in the best interest of customers to incorporate additional wind and solar resources onto its system without the complimenting combined cycle natural gas resource to ensure long-term reliable energy supply to existing customers. This is especially important in light of the baseload coal-fired generation that will be removed from the Company's generation portfolio in 2018 and out through 2026 with the retirement of Boswell Energy Center Units 1&2 ("BEC1&2") and the gradual reduction in off take from Square Butte Cooperative and its Milton R. Young lignite generation station ("Young 2").

Minnesota Power conducted its analysis and is developing its *EnergyForward* Resource Package petition similar to how it would address a combined certificate of need, affiliate interest, and IRP compliance proceeding. Making a decision at the onset of the regulatory review process would be contrary to the way resources are evaluated in a resource acquisition or IRP proceeding; because this proposal derives from the set of decisions issued in the Commission's July 2016 IRP Order, it is likewise appropriate to consider the facts surrounding them in a proceeding where they can be compared and contrasted, and where the size, type, and timing of one resource may affect the size, type, and timing of other components of the package. The Company therefore requests that the Commission allow the regulatory review process to run its full course and assess the merits of Minnesota Power's justification for why it is in customers' best interest to approve the *EnergyForward* Resource Package before rendering a decision on whether to address each proposed resource individually or as a package.

Ultimately, the Commission will have more information if it directs a contested case proceeding to consider each of the components of the *EnergyForward* Resource Package in relation to each other. Separating the components into independent proceedings would complicate the consideration of interrelationships, and potentially result in either different records in different dockets or the duplication of data between resource considerations. As such, the Company believes strongly that a single contested case process is in the best interest of all stakeholders.

Request for Extension to File Next IRP

Minnesota Power's request for a delay of one year or more to submit its next integrated resource plan, and referral of its *EnergyForward* Resource Package filing to the Office of Administrative Hearings for a contested case, is a prudent approach to the regulatory review process for all stakeholders. The Company reiterates that a delay would provide the Commission, the Department, customers, and other interested stakeholders the time to fully evaluate the *EnergyForward* Resource Package as an appropriate implementation of portions of the July 2016 IRP Order, and to determine whether this package is an appropriate set of system additions for the long term benefit of customers. Addressing the package prior to the next IRP filing provides more clarity and specificity regarding the Company's plans to meet customer needs, and will allow the Company to incorporate this action plan arising out of the July 2016 IRP Order into the Company's plans before moving forward with the next IRP.²

The Company acknowledges that need for the generation resources included in the *EnergyForward* Resource Package has already been determined through the 2015 IRP regulatory review process and the July 2016 IRP Order. The July 2016 IRP Order directed Minnesota Power to move forward with analyzing and procuring the appropriate amount of cost-effective wind and solar, within the specified ranges.³

Likewise, beginning with Minnesota Power's 2012 Baseload Diversification Study (and continuing through review of the 2015 IRP), the Company's resource planning analysis, along with the Department's own analysis, consistently demonstrated that a combined cycle natural gas generation resource is an integral part of the Company's long-term power supply to serve its large, energy intensive customers. Through its 2015 IRP evaluation, Minnesota Power and the Department identified up to 400 MW of natural gas additions in the post-2022 time period to replace retiring small coal generation and augment a growing customer base and renewable portfolio. At this time, Minnesota Power's only natural gas resource is the Laskin Energy

² A delay in the filing of the next IRP will also allow Minnesota Power to address changing and dynamic federal and state energy policy that is continuing to evolve.

³ The July 2016 IRP Order also directed Minnesota Power to propose a demand-response competitive-bidding process within six months of the date of this order. The demand-response Request for Proposal ("RFP") was issued in August 2016 as part of the broader RFP process.

Center,⁴ which was converted in 2015 from a coal-fired generation facility to a natural gas peaking facility. The addition of the 250 MW combined cycle natural gas resource in the *EnergyForward* Resource Package, similar to the natural gas resource identified as part of the least-cost plan in the Company's 2015 IRP, is sized appropriately to ensure a flexible and long-term reliable energy supply for Minnesota Power's unique system needs. The July 2016 IRP Order granted approval for Minnesota Power to continue moving forward with the Request for Proposal ("RFP") process to identify potential combined cycle natural gas projects available to the Company in the mid-2020 timeframe. The transformation to a combination of more flexible and cleaner natural gas and renewables is being demonstrated across the industry and in Minnesota as baseload generation is coming off the system. This is similar to Xcel Energy and Otter Tail Power Company, who also plan to add natural gas resources as their coal-fired baseload generation resources are removed from their systems. Minnesota Power's Petition will grant the Commission extensive review of the proposed natural gas resource addition even though it is located in Wisconsin.

Each of the resources included in the proposed *EnergyForward* Resource Package were evaluated as part of the 2015 IRP review process and further action was contemplated on each; therefore, the forthcoming *EnergyForward* Resource Package filing is an extension of the 2015 IRP. Delaying action on the proposed *EnergyForward* Resource Package until after the 2018 IRP regulatory review process is complete in essence nullifies the time, effort and outcomes of the 2015 IRP regulatory review. Additionally, as Minnesota Power brings forward a resource acquisition petition for Commission approval, stakeholders are provided with the opportunity to focus on the specific issues related to resource size, type and timing. Timing is critical to securing resource additions that will require several years of planning, development, financing, permitting, and construction.

Furthermore, the timing of forthcoming reductions of output taken by Minnesota Power from coal-fired generation resources, including BEC1&2 scheduled to retire at the end of 2018, and the gradual phase out of the long-term contract to buy electricity from Young 2 in North Dakota by 2026, warrants proceeding with the *EnergyForward* Resource Package acquisition

⁴ Each of the units at Laskin Energy Center operate with a gross generation capability of 60 MW gross (55 MW net) with 5 MW of existing station service steam to operate auxiliary equipment.

review process now. Given the lead times needed to plan for and address these reductions in power supply, it is appropriate to begin implementation of the July 2016 IRP Order at this time.

Finally, included as a condition precedent in the wind, solar, and natural gas agreements⁵ is receipt of Commission approval of the full *EnergyForward* Resource Package by October 31, 2018, to allow the competitive resource package to be available and in service for customers. Delaying regulatory action on the *EnergyForward* Resource Package until after the 2018 IRP regulatory review process is complete is unnecessary and likely would result in triggering these conditions precedent. For all the reasons stated, Minnesota Power respectfully requests that the Commission approve the Department's recommendation to delay submittal of the Company's next IRP to October 1, 2019.⁶

Request for Referral to the Office of Administrative Hearings

As stated in Minnesota Power's June 8, 2017 letter, the Company recognizes that its request for review and approval of the *EnergyForward* Resource Package will raise important factual, policy, and legal considerations for the Commission to consider. The interrelated nature of the various agreements, coupled with the intricacies of entering into a partnership agreement to jointly own a generation facility that will be owned by an affiliate and dedicated to Minnesota Power on the same basis as if the asset was directly owned by the utility, substantiates the need for a contested case proceeding. A contested case proceeding also has the ideal structure for tracking the many components to this filing and ensuring a thorough record of the important resource planning and generation need considerations that will be fundamental to evaluating the Company's Petition is developed. As illustrations of similar procedural outcomes, the Company's Appendix A to these Reply Comments identifies three recent dockets in which the Commission has approved referral of resource acquisition and investment proposals to the Office of Administrative Hearings due to the multifaceted nature of the underlying issues. Minnesota Power's upcoming Petition will meet this same standard. Similarly, the Company's proposed schedule will provide adequate time for robust analysis and thoughtful decision making, with a proposed Commission decision in autumn of 2018 to accommodate contractual deadlines, federal

⁵ The power purchase agreements will be submitted with the Company's petition.

⁶ The October 1, 2019 due date would also address any concerns about regulatory resources to address other resource plans.

tax credit utilization for the wind and solar projects, and to provide enough time for all stakeholders to address their issues.

A primary consideration in determining the appropriate generation mix to meet Minnesota Power's future power supply needs is the Company's unique customer profile and the impact it will have not only on an individual resource selection but on the combination of resources needed in the timeframe of the *EnergyForward* Resource Package to serve that customer profile. These are factual questions that would benefit from an administrative hearing record. Minnesota Power's retail customer mix is unique in that energy sales to large industrial customers, as a percent of total energy sales, make up 60 percent of total energy sales and 72 percent of retail sales. Many of these large industrial customers operate 24/7, which gives Minnesota Power one of the highest load factors in the nation, resulting in a power supply with less variation in demand than most utilities. Additionally, due to the climate in the Company's service territory, peak consumption occurs in the winter during the evening hours with heating load from all customers. Minnesota Power's customer profile and system needs are vastly different from those of the other Minnesota investor-owned utilities; a contested case proceeding will best ensure full consideration of this unique situation and what combination of resources best meets Minnesota Power's capacity needs.

Combining the elements of the *EnergyForward* Resource Package into one unified package was based on a robust analysis of future customer energy and capacity needs, incorporating Commission guidance from the July 2016 IRP Order, as well as thorough evaluation of all available alternatives including renewable generation, conservation, distributed generation, and demand response. The components of the package are specifically selected from RFP processes and designed to work together, which does require a unique analysis as compared to either individual resource selections or a new IRP plan. The proposed scope of the contested case evaluation will assess the analysis and other supporting information, which includes data typically considered in certificate of need, integrated resource planning, and affiliate interest proceedings. The structure of the contested case proceeding also allows parties extensive opportunity to participate in the factual development of the evidentiary record, while at the same providing the benefit of an Administrative Law Judge's recommendation to the Commission with timing-certainty to the Company in moving through the regulatory review process.

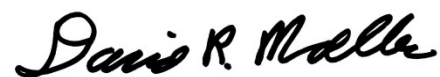
Referral to the Office of Administrative Hearings also ensures a full evaluation of the public interest. The *EnergyForward* Resource Package is a unique and synergistic package designed to work together in providing customers with multiple long-term benefits. It furthers the Company's long-term goal of replacing legacy coal-fired generation, decreasing overall emissions, and increasing renewable penetration on the system, while not sacrificing system reliability. To deny the Company's request for a contested case proceeding, instead conducting separate evaluation of the individual resources, would be incongruent with the analysis performed of the wind, solar, natural gas, and demand response proposals received through the RFP processes and used to identify the future power supply mix that is in the best interest of its customers.

III. SUMMARY

Minnesota Power respectfully requests that the Commission approve an extension for filing its next IRP to provide stakeholders and the Commission time to fully evaluate the *EnergyForward* Resource Package and ensure that the Commission's decision can be incorporated into the analysis for the Company's next IRP filing. Minnesota Power also asks the Commission to allow the *EnergyForward* Resource Package to be reviewed as a single package and be referred to the Office of Administrative Hearing for a contested case. This will allow for full consideration of the important resource planning and generation need considerations that will be fundamental to evaluating the Company's Petition. Minnesota Power appreciates the opportunity to provide these Reply Comments and looks forward to a hearing on this important procedural issue.

Dated: July 12, 2017

Respectfully Submitted,



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APPENDIX A:

Illustrative Examples of Resource Applications Selected for Submission to Contested Case Proceedings

1. Background

Minnesota Rule 7829.1000 states:

If a proceeding involves contested material facts and there is a right to a hearing under statute or rule, or if the commission finds that all significant issues have not been resolved to its satisfaction, the commission shall refer the matter to the Office of Administrative Hearings for contested case proceedings, unless:

A. all parties waive their rights to contested case proceedings and instead request informal or expedited proceedings, and the commission finds that informal or expedited proceedings would be in the public interest; or

B. a different procedural treatment is required by statute.

(Emphasis added.)

The Company is proposing to submit a package of interrelated resource acquisitions to the Minnesota Public Utilities Commission for review and approval, seeking a decision that includes assessment of each of Certificate of Need, Power Purchase Agreement, and Affiliated Interest-related considerations. The Commission has previously directed such complex resource approvals to contested cases consistent with Minn. R. 7829.1000, as such acquisitions require assessment of significant complex issues of fact, law, and policy that benefit from the contested case process. Minnesota Power supports this same approach in this proceeding, and provides several examples of complex resource acquisition/development proceedings where a contested case was warranted on the same or similar bases.

2. Illustrative Examples

a. Minnesota Power Square Butte DC Line Acquisition, Docket No. E015/PA-09-526

Commission Order:

The Commission finds that it cannot resolve all issues raised in the petition on the basis of the record before it. Those issues turn on numerous, specific facts that are best developed in formal evidentiary hearings. The Commission will therefore refer the matter to the Office of Administrative Hearings for contested case proceedings.¹

¹ *In the Matter of Minnesota Power's Petition to Purchase Square Butte Cooperative's Transmission Assets and for Restructuring Power Purchase Agreements from Milton R. Young Unit 2 Generating Station, Docket No. E-015/PA-09-526, Notice and Order for Hearing at p. 1-2 (July 1, 2009) (noting also that "[t]he petition stated that the transactions at issue are factually complex and requested a referral to the Office of Administrative Hearings for contested case proceedings.).*

APPENDIX A:

Large Power Intervenor Comments:

Given the complexity of the issues involved in this Petition, the Large Power Intervenor believe this proceeding should be referred to the Office of Administrative Hearings for a contested case proceeding. Also, we believe the analysis in this proceeding should include review of Minnesota Power's plans for constructing approximately 300 MW of additional wind capacity in North Dakota. As evidenced from Minnesota Power's petition in this docket, the additional wind capacity is the fundamental reason for acquiring Square Butte Cooperative's Transmission Assets.²

Department of Commerce, Office of Energy Security³

Based upon this preliminary review, OES agrees with MP's characterization of the Petition (at page 53) that "this is a unique filing that encompasses multiple transactions as well as complex legal and policy issues." Therefore, OES agrees that it is likely that material facts will be contested, at least at this point, and thus OES agrees with MP's recommendation that the Commission refer the Petition to the OAH for a contested case proceeding.⁴

b. Xcel Energy Competitive Resource Acquisition, Docket No. E-002/CN-12-1240

Commission Order, noting "need" previously determined:

On March 5, 2013, in a separate docket, the Commission issued an order declaring that Xcel had demonstrated the need for an additional 150 megawatts (MW) by 2017, increasing up to 500 MW by 2019. And in the current docket, the Commission issued an order designating April 15, 2013, as the deadline for developers to file proposals to meet some or all of Xcel's need.⁵

Commission Order, noting a contested case is appropriate despite withdrawal of the Certificate of Need Application:

PUC Order, p. 4: The Commission finds that it cannot satisfactorily resolve all questions regarding the prudence of the various competitive proposals in this docket on the basis of the current filings. The Commission will therefore refer the matter to the Office of Administrative Hearings for contested case proceedings.⁶

² Docket No. E-015/PA-09-526, Large Power Intervenor Comments at p. 1.

³ Now Department of Commerce – Division of Energy Resources ("DOC" or "Department").

⁴ Docket No. E-015/PA-09-526, Department Comments at p. 3, (noting also that petition involves several issues, a package of proposals, and consideration of multiple alternatives).

⁵ *In the Matter of the Petition of Northern States Power Company d/b/a Xcel Energy for Approval of Competitive Resource Acquisition Proposal and Certificate of Need*, Notice and Order for Hearing at p. 2 (June 21, 2013).

⁶ *Id.* at p. 4.

APPENDIX A:

c. Minnesota Energy Resources Corporation Rochester Pipeline Proceeding, Docket No. G-011/M-15-895

If a proceeding involves contested material facts and there is a right to a hearing under statute or rule, or if the Commission finds that all significant issues have not been resolved to its satisfaction, the Commission must refer the matter to the OAH for contested-case proceedings.

The Commission finds that it cannot satisfactorily resolve all questions regarding the Rochester Project on the basis of MERC's filings. Evaluating the reasonableness and prudence of the project will involve factual determinations, policy decisions, and the first interpretation of a new statute. The development of a comprehensive, disciplined record by an administrative law judge will greatly aid the Commission's decision-making in this matter. The Commission will therefore refer MERC's petition to the OAH.⁷

⁷ *In the Matter of a Petition by Minnesota Energy Resources Corporation for Evaluation and Approval of Rider Recovery for Its Rochester Natural Gas Extension Project*, Docket Nos. G-011/M-15-895, Notice and Order for Hearing at p. 4 (Feb. 8, 2016).

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
E-FILING AND
FIRST CLASS MAIL

Susan Romans, of the City of Duluth, County of St. Louis, State of Minnesota, says that on the **12th day of July, 2017**, she filed Minnesota Power's Reply Comments in **Docket No. E015/RP-15-690** on the Minnesota Public Utilities Commission and the Minnesota Department of Commerce via electronic filing. The remaining parties on the attached Official Service Lists were served as requested.



Susan Romans

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