

September 21, 2015

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

RE: Response Comments of Minnesota Department of Commerce, Division of Energy Resources to the Reply Comments of Northern States Power Company
Docket No. E,G002/D-15-46

Dear Mr. Wolf:

Attached please find the Minnesota Department of Commerce, Division of Energy Resources' (Department) Response Comments to the August 28, 2015 Reply Comments of Northern States Power Company, doing business as Xcel Energy (Xcel).

The Department now recommends that the Commission:

- approve Xcel's proposed depreciation lives for electric production, gas production and gas storage, except for the remaining lives of Sherco Unit 2, Angus C. Anson Units 2 and 3, and Granite City Units 1 to 4;
- revise the remaining lives for Sherco Unit 2 and Angus C. Anson Units 2 and 3 to the Department recommended 10 years;
- revise the remaining lives for Granite City Units 1 to 4 to 8 years;
- approve Xcel's proposed remaining life of 7 years for Sherco Unit 1;
- approve Xcel's proposed salvage rates for electric production, gas production and gas storage, except for the salvage rates of Sherco Units 1, 2, and 3;
- approve Xcel's corrected salvage rates for Sherco Units 1 and 2 of negative 15.2 percent; and
- approve Xcel's corrected salvage rates for Sherco Unit 3 of negative 2.7 percent.

The Department continues to recommend that the Commission:

- require Xcel to file its next remaining life depreciation filing by February 17, 2017;
- require Xcel to continue to provide in future depreciation filings a comparison of depreciation remaining lives and resource planning lives for electric production with an explanation of any differences;
- require Xcel to continue to provide in future depreciation filings a historical comparison of changes in remaining lives and net salvage rates; and
- require Xcel to continue to provide in future depreciation filings updates on removal costs for the Minnesota Valley Plant, Key City Plant and Black Dog Units

3 and 4, including the impact on depreciation reserves, and a final true up when the retirement/removal is completed.

The Department also requests that Xcel provide in Supplemental Reply Comments:

- an update of the Department's Tables 3 and 4 based on the Department's revised recommended life for Sherco Unit 1 to 7 years and Granite City Units 1 to 4 to 8 years; and
- a table showing the depreciation expense impact for each Department recommendation with and without probabilities, including the impact for increasing the life of Sherco Unit 2 to 10 years, Angus C. Anson Units 2 and 3 to 10 years and Granite City Units 1 to 4 to 8 years, and Xcel's correction of the error for Sherco's net salvage rates.

The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ NANCY A. CAMPBELL
Financial Analyst

/s/ MICHELLE ST. PIERRE
Financial Analyst

NC/MS/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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

DOCKET NO. E,G002/D-15-46

I. BACKGROUND

On July 17, 2015, the Minnesota Department of Commerce, Division of Energy Resources (Department or DOC) filed *Comments* with the Minnesota Public Utilities Commission (Commission) in the matter of Northern States Power Company's (Xcel or the Company) May 18, 2015 *Review of Remaining Lives* for 2015 in the current docket. In its *Comments*, the Department recommended that the Commission:

- approve Xcel's proposed depreciation lives and salvage rates for electric production, gas production and gas storage, except for the remaining lives of Sherco Units 1 and 2, Angus C. Anson Units 2 and 3, and Granite City Units 1 to 4;
- revise the remaining lives for Sherco Units 1 and 2, Angus C. Anson Units 2 and 3, and Granite City Units 1 to 4 to the Department recommended 10 years;
- require Xcel to file its next remaining life depreciation filing by February 17, 2017;
- require Xcel to continue to provide in future depreciation filings:
 - a comparison of depreciation remaining lives and resource planning lives for electric production with an explanation of any differences;
 - a historical comparison of changes in remaining lives and net salvage rates; and
 - updates on removal costs for the Minnesota Valley Plant, Key City Plant and Black Dog Units 3 and 4, including the impact on depreciation reserves, and a final true up when the retirement/removal is completed.

The Department also requested that Xcel provide in *Reply Comments*:

- the depreciation expense impacts for the remaining life changes recommended by the Department; and
- an explanation as to why no capital additions were planned for 2015 and 2016 for the Sibley gas production facility.

On July 21, 2015, Xcel requested an extension to August 28, 2015 to file *Reply Comments*. On August 28, 2015 Xcel filed its *Reply Comments* to the Office of the Attorney General – Residential Utilities and Antitrust Division and the Department.

II. THE DEPARTMENT'S RESPONSE TO XCEL'S REPLY COMMENTS

A. EXTENDED REMAINING LIVES

The Department recommended that the Commission extend the remaining lives to 10 years for Sherco Units 1 and 2 (from 7 years), Angus C. Anson Units 2 and 3 (from 3.8 years), and Granite City Units 1 to 4 (from 3.3 years). The Department stated that a 10-year life for Sherco Units 1 and 2 was consistent with the Integrated Resource Plan (IRP or Resource Plan), albeit conservative since Xcel proposed to keep the plants operating until 2030, as well as the emission control projects approved for Sherco (Units 1, 2, and 3) in Xcel's most recent general rate case.¹ For both Angus C. Anson Units 2 and 3 and Granite City Units 1 to 4, the Department stated that the Company is assuming longer remaining lives in the IRP without any capital addition planned.² Thus, similar to the recommendation for the Sherco facilities, the Department recommended a 10-year life for these units, to be conservative.

Xcel responded in its *Reply Comments* as follows for all of the units:

The Department recommended approval of our proposed depreciation lives and salvage rates except for six units which they recommended revising to ten years to align with those contemplated in our current Resource Plan.³ We appreciate the Department's review of our request but believe it is premature to adjust these remaining lives while the Resource Plan is under review. There will be opportunities in future annual remaining lives filings and in our upcoming rate case to update and reassess when more definitive operational information is known.⁴

For purposes of these response comments, the Department considered the following in its additional review of the extended remaining lives for Sherco Units 1 and 2, Angus C. Anson Units 2 and 3, and Granite City Units 1 to 4:

1. Xcel's Reply Comments as discussed above;
2. discussions with DOC IRP staff; and

¹ Department's *Comments*, pages 12-13.

² Xcel's IRP assumes a 15-year remaining life for Angus C. Anson Units 2 and 3 and an 8-year remaining life for Granite City Units 1 to 4.

³ Docket No. E002/RP-15-21.

⁴ Xcel's *Reply Comments*, page 1.

3. additional review of Xcel's Attachment F to its initial filing to ensure a reasonable balancing of accounting depreciation lives used in setting rates and integrated resource planning lives.

1. *Xcel's Reply Comments*

As indicated above, Xcel stated in its *Reply Comments* that it would be premature to adjust these remaining lives as recommended by the Department while the IRP is still under review. Additionally, the Company stated that there will be additional opportunities in future annual lives filings and in Xcel's upcoming rate case to reassess when more definite operational information is known. While the Department revises its recommendations somewhat below, based on its additional analysis, the Department recommends that the Commission adjust depreciation lives at least for the Angus C. Anson units, Granite City Units 1 to 4, and one of the Sherco units. This approach would reduce the number of items to address in Xcel's upcoming multi-year rate case.

For the Angus C. Anson Units 2 and 3 and Granite City Units 1 to 4, all of which are powered by natural gas, waiting for the IRP completion and approval is not likely to provide additional information as suggested by Xcel, since the Company recommended in their IRP preferred plan a useful life of 15 years for Angus C. Anson Units 2 and 3, and 8 years for Granite City Units 1 to 4. Further, neither the Department nor any other party has opposed these remaining lives for IRP purposes. Therefore, the expected lives for Angus C. Anson Units 2 and 3 should be increased from 3.8 years to 10 years, as recommended by the Department. For the Granite City Units 1 to 4, the Department revises its recommendation for the remaining lives from 10 years to 8 years, to reflect the assumed lives in the IRP. Thus, the current life should increase from 3.3 years to 8 years. Waiting until the IRP is approved or the November upcoming rate case will not provide better information for these two sets of facilities as indicated by the Company.

Additionally, for Sherco Units 1 and 2, Xcel recommended in its preferred IRP plan a 15-year life through the end of the IRP period (or at the earliest 2025, a 10 year life). For Sherco Unit 1, the Department recommended a possible repowering to use a natural gas boiler in the 2025 to 2026 timeframe or a 10-year life for IRP purposes.⁵ The Department also recommended that the Company file its next IRP January 16, 2017 to address the Sherco Units 1 and 2 action plan. The Clean Energy Organizations proposed retiring one Sherco unit in 2021 and the second in 2024.⁶ Thus, no party is proposing to shut down both units prior to 2024. Therefore, at least for one Sherco unit, based on the information available, even under the most strict recommendation in Xcel's IRP, it would be reasonable to extend the life of one Sherco unit to 10 years. The Department discusses Sherco Unit 1 in the next section.

⁵ Department's July 2, 2015 Comments, Docket No. E002/RP-15-21.

⁶ Clean Energy Organizations' July 2, 2015 Comments, Docket No. E002/RP-15-21.

2. Discussions with DOC's IRP Staff

Based on discussions with DOC IRP staff, the Department now recommends the more conservative depreciation life for Sherco Unit 1. DOC IRP staff noted that, based on the limited information known at this time about the effects of the Environmental Protection Agency's Clean Power Plan, one of the Sherco units may need to be shut down prior to 2025. Therefore, at this time, the Department is no longer recommending a change to the Company's depreciation remaining life of 7 years for Sherco Unit 1.

3. Xcel's Attachment F

The Department further reviewed the Company's Attachment F in its initial filing and, using the most conservative IRP assumptions, recommends the below depreciation lives. In its review, the Department balances both rate-case recovery, to ensure that depreciation expense is set at a reasonable level of recovery from ratepayers, and the IRP process, to ensure that recovery of prudently incurred capital costs of the plant by the utility are reasonably spread over the expected life of facilities. The Department has always sought a reasonable balance between these two important goals, and notes the importance of doing so under the recently enacted amendment of Minnesota Statute section 216B.16, subd. 6, which states:

If the commission orders a generating facility to terminate its operations before the end of the facility's physical life in order to comply with a specific state or federal energy statute or policy, the commission may allow the public utility to recover any positive net book value of the facility as determined by the commission.

The following table compares Xcel's preferred plan lives from the IRP, the Department's initial recommendations from its Comments, and the remaining lives that the Department now recommends in the these Supplemental Comments:

Table 1: Comparison of Lives in IRP to DOC's Recommendations

	Xcel's IRP Preferred Plan	DOC's Initial RL⁷	DOC's Response RL
Sherco Unit 1	10 to 15 years	10 years	7 years
Sherco Unit 2	10 to 15 years	10 years	10 years
Angus Anson Units 2 & 3	15 years	10 years	10 years
Granite City Units 1 to 4	8 years	10 years	8 years

The Department considers our revised recommendations for extending the remaining lives for Sherco Unit 2, Angus C. Anson Units 2 and 3, and Granite City Units 1 to 4 to be conservative and reasonable, striking an appropriate balance of the important goals of setting reasonable depreciation rates yet allowing Xcel a fair recovery of its plant investment

⁷ Remaining Life.

from the customers who will use the facilities. Further, the Department urges the Commission to make a timely decision on these remaining lives for purposes of depreciation, so that the lives can be used into Xcel's upcoming multi-year rate case when setting base rates.

Regarding the remaining lives, the Department recommends that the Commission:

- approve Xcel's proposed depreciation lives for electric production, gas production and gas storage, except for the remaining lives of Sherco Unit 2, Angus C. Anson Units 2 and 3, and Granite City Units 1 to 4; and
- revise the remaining lives for Sherco Unit 2 and Angus C. Anson Units 2 and 3 to the Department recommended 10 years.

In addition, the Department now recommends in these response comments that the Commission:

- approve Xcel's proposed remaining life of 7 years for Sherco Unit 1; and
- revise the remaining lives for Granite City Units 1 to 4 to the Department's recommended 8 years.

B. SHERCO FACILITY'S REMOVAL COST ERROR

Xcel explained that the Company recently discovered an error in the initial filing:

In addition to addressing the recommendations of the Department and the OAG below, we also have a correction to our petition. As discussed below, we recently discovered that the cost of removal for ash landfills was overstated for the Sherco steam production facility. Our initial filing stated this removal cost was \$35.3 million, however, upon review, we realized the removal cost should have been \$20.4 million. Accordingly, our recommended depreciation change for 2016 is \$3.1 million as compared to \$4.9 million in our initial filing.⁸

Later in its reply, Xcel provided more detail on the error:

We also would like to take this opportunity to provide a correction to our original filing. During a subsequent review of the data in the Dismantling Cost study, which was included in our initial filing, we discovered that the cost of removal for ash landfills was twice what it should have been for the Sherco steam production facility. Our original filing stated this removal cost was \$35.3 million, however, upon review, we realized the removal cost should have been \$20.4 million.

⁸ Xcel's Reply Comments, page 2.

Due to this error, the project total for dismantling Sherco was overstated by \$14.8 million. Based on the corrected cost estimate, we are recommending a net salvage rate of negative 15.2 percent for Sherco Units 1 and 2 and negative 2.7 percent for Sherco Unit 3. These recommended net salvage rates result in a recommended change in depreciation that is \$1.8 million lower than previously stated. As a result, our recommended depreciation change for 2016 is \$3.1 million as compared to \$4.9 million in our initial filing. We have included updated versions of Revised Attachments A, B, and G with our reply to account for these corrections.⁹

Thus, the net salvage rates went down for Sherco as shown below:

Table 2: Sherco Salvage Rate Before and After Correction

	Salvage Before Corrected	Salvage After Corrected
Sherco Units 1 and 2	-17%	-15.2%
Sherco Unit 3	-3%	-2.7%

Xcel stated that these recommended net salvage rates result in a recommended reduction in the Company's proposed 2016 depreciation of \$1.8 million lower than previously stated.¹⁰

The Department appreciates Xcel's correction of its net salvage rates for Sherco Units 1, 2, and 3 as shown above. The Department recommends that the Commission accept this correction, which reduces Xcel's proposed depreciation expense (with probabilities) increase from \$4.9 million to \$3.1 million, or a \$1.8 million reduction in depreciation expense.

Regarding salvage rates, the Department continues to recommend that the Commission approve Xcel's proposed salvage rates for electric production, gas production and gas storage. In addition, the Department now recommends that the Commission:

- approve Xcel's corrected salvage rates for Sherco Units 1 and 2 of negative 15.2 percent; and
- approve Xcel's corrected salvage rates for Sherco Unit 3 of negative 2.7 percent.

C. IMPACT OF USING 10-YEAR LIVES

Xcel calculated and compared the Department's recommended dollar adjustments to its adjustments with probabilities. The Company stated:

⁹ Xcel's Reply Comments, page 5.

¹⁰ The Department notes that in this docket we are not making any additional recommendations for the decommissioning probabilities. Docket No. E999/CI/13-626 is pending a Commission decision. See Xcel's initial petition for further information on decommissioning probabilities.

In response to the Department's request, we have calculated the depreciation expense impact based upon their above recommendation to extend the remaining lives of these six units to ten years. This proposed life extension results in an overall \$11.3 million decrease to depreciation expense in 2016. The original filing showed a \$4.9 million increase, thus resulting in a \$16.2 million decrease from what was filed. With the correction of the Sherco net salvage, the Department's scenario results in a \$12.6 million decrease to depreciation in 2016. Comparing this to our revised \$3.1 million increase results in a \$15.7 million decrease from the Company's recommendations to the Department's recommendations. We have included the detailed depreciation impact in Attachment A.

The Department made Tables 3 and 4 based on the above information:

Table 3: Dollar Differences Between the DOC and Xcel With Probabilities

	DOC's adjustment to lives (with probabilities) (a)	Xcel's proposed lives (with probabilities) (b)	Difference between DOC and Xcel (with probabilities) (c) = (a) - (b)
Total Before Correction	\$11.3 M decrease	\$4.9 M increase	\$16.2 M decrease
Total After Correction	\$12.6 M decrease	\$3.1 M increase	\$15.7 M decrease
Change	\$1.3 M decrease	\$1.8 M decrease	(\$0.5) M ¹¹

The Department also provides Table 4 to show the dollar differences of the DOC's adjustments to remaining lives with and without probabilities.

Table 4: DOC's Adjustments to Remaining Lives With and Without Probabilities

	DOC's adjustment to lives (with probabilities) (a)	DOC's adjustment to lives (without probabilities) ¹² (b)
Total Before Correction	\$11.3 M ¹³ decrease	\$7.8 M decrease ¹⁴
Total After Correction	\$12.6 M decrease	\$9.2 M decrease
Change	\$1.3 M decrease	\$1.4 M decrease

¹¹ This difference reflects the Department's recommended longer life and lower depreciation expense for Sherco Units 1 and 2 resulting in a smaller correction to net salvage.

¹² Xcel provide the figures in column (b) in a September 16, 2015 email.

¹³ Million.

¹⁴ On page 16 of its Petition, Xcel estimated an increase in depreciation expense of \$8.4 million without probabilities.

The Department requests that Xcel update the Department's Tables 3 and 4 based on the Department's revised recommended life for Sherco Unit 1 to 7 years and Granite City Units 1 to 4 to 8 years. The Department also requests that the Company provide a table showing the depreciation expense impact for each Department recommendation with and without probabilities, including the impact for Sherco Unit 2, Angus C. Anson Units 2 and 3, Granite City Units 1 to 4 and Xcel's correction of the error for Sherco's net salvage rates. This information will allow the Commission and all parties to clearly see the impact of each change to depreciation expense that will likely be the starting point for Xcel's upcoming multi-year rate case.

D. SIBLEY CAPITAL ADDITIONS IN 2015 AND 2016

In its Comments, the Department stated that it was difficult to understand why no capital additions were planned for 2015 and 2016 for Sibley especially when the initial budget included replacing the 4160-volt control panel and all compressors and there are at least 10 recommendations (items 53-59, 63, 64, and 65) listed in the study for Sibley.¹⁵ Xcel replied:

In our response to DOC Information Request No. 11, we erroneously stated that no capital additions were currently planned for Sibley in 2015 or 2016. After further examination of the capital budget data, we determined that the specific projects for Sibley were processed with other gas capital projects and were not readily identifiable as Sibley related additions. As a result, there are in fact capital additions planned for Sibley during this timeframe.

Specifically, there are three capital projects slated for 2016, including the replacement of old Programmable Logic Controller's (PLC) at a cost of \$200,000, the replacement of Motor Control Center (MCC) switchgear panels at a cost of \$750,000, and the replacement of all compressors at a cost of \$3.5 million. These three projects are needed to avoid additional operational and maintenance costs and to avoid plant shutdowns and ensure future production reliability.

The Department is satisfied and has no further issues with the Sibley gas production plant capital additions in 2015 and 2016 at this time.

¹⁵ Department's *Comments*, pages 9-10.

III. RECOMMENDATIONS

The Department now recommends that the Commission:

- approve Xcel's proposed depreciation lives for electric production, gas production and gas storage, except for the remaining lives of Sherco Unit 2, Angus C. Anson Units 2 and 3, and Granite City Units 1 to 4;
- revise the remaining lives for Sherco Unit 2 and Angus C. Anson Units 2 and 3 to the Department recommended 10 years;
- revise the remaining lives for Granite City Units 1 to 4 to 8 years;
- approve Xcel's proposed remaining life of 7 years for Sherco Unit 1;
- approve Xcel's proposed salvage rates for electric production, gas production and gas storage, except for the salvage rates of Sherco Units 1, 2, and 3;
- approve Xcel's corrected salvage rates for Sherco Units 1 and 2 of negative 15.2 percent; and
- approve Xcel's corrected salvage rates for Sherco Unit 3 of negative 2.7 percent.

The Department continues to recommend that the Commission:

- require Xcel to file its next remaining life depreciation filing by February 17, 2017;
- require Xcel to continue to provide in future depreciation filings a comparison of depreciation remaining lives and resource planning lives for electric production with an explanation of any differences;
- require Xcel to continue to provide in future depreciation filings a historical comparison of changes in remaining lives and net salvage rates; and
- require Xcel to continue to provide in future depreciation filings updates on removal costs for the Minnesota Valley Plant, Key City Plant and Black Dog Units 3 and 4, including the impact on depreciation reserves, and a final true up when the retirement/removal is completed.

The Department also requests that Xcel provide in Supplemental Reply Comments:

- an update of the Department's Tables 3 and 4 based on the Department's revised recommended life for Sherco Unit 1 to 7 years and Granite City Units 1 to 4 to 8 years; and
- a table showing the depreciation expense impact for each Department recommendation with and without probabilities, including the impact for increasing the life of Sherco Unit 2 to 10 years, Angus C. Anson Units 2 and 3 to 10 years and Granite City Units 1 to 4 to 8 years, and Xcel's correction of the error for Sherco's net salvage rates.

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
Response Comments**

Docket No. E,G002/D-15-46

Dated this 21st day of September 2015

/s/Sharon Ferguson

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