

215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpco.com (web site)



May 16, 2017

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

**RE: In the Matter of Otter Tail Power Company's 2016 Conservation Cost Recovery
Adjustment and 2016 Electric Demand Side Management Financial Incentive
Docket No. E017/M-17-246
REPLY COMMENTS**

Dear Mr. Wolf:

The Minnesota Department of Commerce Staff (Department) filed comments on May 1, 2017, recommending approval of Otter Tail Power Company's (Otter Tail or the Company):

1. 2016 Conservation Improvement Project (CIP) tracker account, resulting in a December 31, 2016 tracker balance of \$4,835,852;
2. Financial incentive of \$5,031,678 for Otter Tail's 2016 CIP achievements;
3. Conservation Cost Recovery Adjustment of \$0.00754/kWh with an effective date of October 1, 2017;
4. Proposal to be granted a variance to Minnesota Rules part 7820.3500(K) and part 7825.2600 for one year after the issue date of the Commission's Order in the present docket.

Otter Tail appreciates the Department's review of the carrying charges applied in the CIP tracker account. Otter Tail agrees with the Department's recommendation, the likely approved new short-term cost of debt rate of 2.55 percent from the Company's 2016 rate case should be applied beginning in the month the Commission's final Order on the rate case is issued. Otter Tail agrees with the Department's recommendation, to submit a filing in the instant docket within 20 days of the Commission's final rate case Order; updating the carrying charge, the projected tracker balance, and the CCRA in the instant docket.

Otter Tail also accepts the Department's additional recommendation, requiring the Company to submit a compliance filing within 10 days of the issue date of the Order in the present docket, with revised tariff sheet reflecting the Commission's determinations in this matter.

Mr. Wolf
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A Certificate of Service is also enclosed. Otter Tail has served a copy of this filing on all parties listed on the enclosed Service List. If you or Commission Staff have any questions, please contact me at (218) 739-8639 or jgrenier@otpc.com.

Very truly yours,

/s/ JASON GRENIER
Jason Grenier
Manager, Market Planning

jch
Enclosures
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

RE: In the Matter of Otter Tail Power Company's 2016 Conservation Cost Recovery Adjustment and 2016 Electric Demand Side Management Financial Incentive Docket Nos. E017/M-17-246

I, Jana Hrdlicka, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class mail.

**Otter Tail Power Company
Reply Comments**

Dated this **16th** day of **May, 2017**

/s/ JANA HRDLICKA

Jana Hrdlicka
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8879

| 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_17-246_M-17-246 |
| Christopher | Anderson | canderson@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022191 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| 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_17-246_M-17-246 |
| John | Bailey | bailey@ilsr.org | Institute For Local Self-Reliance | 1313 5th St SE Ste 303 Minneapolis, MN 55414 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| 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_17-246_M-17-246 |
| Lisa | Beckner | lbeckner@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 55802 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| William | Black | bblack@mmua.org | MMUA | Suite 400 3025 Harbor Lane North Plymouth, MN 554475142 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| 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_17-246_M-17-246 |
| Christina | Brusven | cbrusven@fredlaw.com | Fredrikson Byron | 200 S 6th St Ste 4000 Minneapolis, MN 554021425 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Charlie | Buck | charlie.buck@oracle.com | Oracle | 760 Market St FL 4 San Francisco, CA 94102 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| | | | | | | | |

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|------------|-----------|---|---|--|--------------------|-------------------|------------------------|
| Ray | Choquette | rchoquette@agp.com | Ag Processing Inc. | 12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Gary | Connett | gconnett@grenergy.com | Great River Energy | 12300 Elm Creek Blvd N Maple Grove, MN 553694718 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| George | Crocker | gwillc@nawo.org | North American Water Office | PO Box 174 Lake Elmo, MN 55042 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Carl | Cronin | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Jill | Curran | jcurran@mnchamber.com | Minnesota Waste Wise | 400 Robert Street North Suite 1500 St. Paul, Minnesota 55101 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| 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_17-246_M-17-246 |
| Jeffrey A. | Daugherty | jeffrey.daugherty@centerpointenergy.com | CenterPoint Energy | 800 LaSalle Ave Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Ian | Dobson | Residential.Utilities@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_17-246_M-17-246 |
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|------------|------------|------------------------------|--|--|--------------------|-------------------|------------------------|
| Charles | Drayton | charles.drayton@enbridge.com | Enbridge Energy Company, Inc. | 7701 France Ave S Ste 600 Edina, MN 55435 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Jim | Erchul | jerchul@dbnhs.org | Daytons Bluff Neighborhood Housing Sv. | 823 E 7th St St. Paul, MN 55106 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| James C. | Erickson | jericksonkbc@gmail.com | Kelly Bay Consulting | 17 Quechee St Superior, WI 54880-4421 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Greg | Ernst | gaernst@q.com | G. A. Ernst & Associates, Inc. | 2377 Union Lake Trl Northfield, MN 55057 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Emma | Fazio | emma.fazio@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Melissa S | Feine | melissa.feine@semcac.org | SEMCAC | PO Box 549 204 S Elm St Rushford, MN 55971 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Edward | Garvey | garveyed@aol.com | Residence | 32 Lawton St Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Bruce | Gerhardson | bgerhardson@otpc.com | Otter Tail Power Company | PO Box 496 215 S Cascade St Fergus Falls, MN 565380496 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Angela E. | Gordon | angela.e.gordon@lmco.com | Lockheed Martin | 1000 Clark Ave. St. Louis, MO 63102 | Electronic Service | No | OFF_SL_17-246_M-17-246 |

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|------------|-----------|------------------------------------|-------------------------------|---|--------------------|-------------------|------------------------|
| Pat | Green | N/A | N Energy Dev | City Hall 401 E 21st St Hibbing, MN 55746 | Paper Service | No | OFF_SL_17-246_M-17-246 |
| Jason | Grenier | jgrenier@otpc.com | Otter Tail Power Company | 215 South Cascade Street Fergus Falls, MN 56537 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Stephan | Gunn | sgunn@appliedenergygroup.com | Applied Energy Group | 1941 Pike Ln De Pere, WI 54115 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Jeffrey | Haase | jhaase@greenergy.com | Great River Energy | 12300 Elm Creek Blvd Maple Grove, MN 55369 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| 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_17-246_M-17-246 |
| J Drake | Hamilton | hamilton@fresh-energy.org | Fresh Energy | 408 St Peter St Saint Paul, MN 55101 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Patty | Hanson | phanson@rpu.org | Rochester Public Utilities | 4000 E River Rd NE Rochester, MN 55906 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Norm | Harold | N/A | NKS Consulting | 5591 E 180th St Prior Lake, MN 55372 | Paper Service | No | OFF_SL_17-246_M-17-246 |
| Jared | Hendricks | hendricksj@owatonnautilities.com | Owatonna Public Utilities | PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Shane | Henriksen | shane.henriksen@enbridge.com | Enbridge Energy Company, Inc. | 1409 Hammond Ave FL 2 Superior, WI 54880 | Electronic Service | No | OFF_SL_17-246_M-17-246 |

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|------------|-----------|-------------------------------|---------------------------------------|--|--------------------|-------------------|------------------------|
| Holly | Hinman | holly.r.hinman@xcelenergy.com | Xcel Energy | 414 Nicollet Mall, 7th Floor Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Karolanne | Hoffman | kmh@dairynet.com | Dairyland Power Cooperative | PO Box 817 La Crosse, WI 54602-0817 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| 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_17-246_M-17-246 |
| Jim | Horan | Jim@MREA.org | Minnesota Rural Electric Association | 11640 73rd Ave N Maple Grove, MN 55369 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| 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_17-246_M-17-246 |
| Dave | Johnson | dave.johnson@aeoa.org | Arrowhead Economic Opportunity Agency | 702 3rd Ave S Virginia, MN 55792 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Joel W. | Kanvik | joel.kanvik@enbridge.com | Enbridge Energy LLC | 4628 Mike Colalillo Dr Duluth, MN 55807 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Deborah | Knoll | dknoll@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 55802 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Tina | Koecher | tkoecher@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Kelly | Lady | kellyl@austinutilities.com | Austin Utilities | 400 4th St NE Austin, MN 55912 | Electronic Service | No | OFF_SL_17-246_M-17-246 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|------------------------------------|-------------------------------------|--|--------------------|-------------------|------------------------|
| Erica | Larson | erica.larson@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| James D. | Larson | james.larson@avantenergy.com | Avant Energy Services | 220 S 6th St Ste 1300 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Douglas | Larson | dlarson@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Martin | Lepak | Martin.Lepak@aeoa.org | Arrowhead Economic Opportunity | 702 S 3rd Ave Virginia, MN 55792 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Kavita | Maini | kmairi@wi.rr.com | KM Energy Consulting LLC | 961 N Lost Woods Rd Oconomowoc, WI 53066 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Nick | Mark | nick.mark@centerpointenergy.com | CenterPoint Energy | 800 LaSalle Ave Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E St. Paul, MN 55106 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| 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_17-246_M-17-246 |
| 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_17-246_M-17-246 |
| John | McWilliams | jmm@dairy.net | Dairyland Power Cooperative | 3200 East Ave SPO Box 817 La Crosse, WI 54601-7227 | Electronic Service | No | OFF_SL_17-246_M-17-246 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|----------------------------------|---------------------------------------|---|--------------------|-------------------|------------------------|
| Brian | Meloy | brian.meloy@stinson.com | Stinson, Leonard, Street LLP | 150 S 5th St Ste 2300 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Craig | Metz | N/A | EnSave Energy Performance | 65 Millet St, Suite 105 Richmond, VT 05477 | Paper Service | No | OFF_SL_17-246_M-17-246 |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Gary | Myers | garym@hpuc.com | Hibbing Public Utilities | PO Box 249 Hibbing, MN 55746 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Susan K | Nathan | snathan@appliedenergygroup.com | Applied Energy Group | 2215 NE 107th Ter Kansas City, MO 64155-8513 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Carl | Nelson | cnelson@mncee.org | Center for Energy and Environment | 212 3rd Ave N Ste 560 Minneapolis, MN 55401 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Jed | Norgaarden | J.Norgaarden@src-mn.org | Sustainable Resources Center | 1081 10th Ave SE Minneapolis, MN 55414 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| 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_17-246_M-17-246 |
| Paul | Ohlson | N/A | EnSave Energy Performance | 65 Millet Street, Suite 105 Richmond, VT 05477 | Paper Service | No | OFF_SL_17-246_M-17-246 |

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|------------|------------|------------------------------------|-----------------------------|---|--------------------|-------------------|------------------------|
| Matt | Okeefe | Matt.okeefe@oracle.com | Oracle | 760 Market St FL 4 San Francisco, CA 94102 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Audrey | Partridge | audrey.peer@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Mall Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Lisa | Pickard | lpickard@minnkota.com | Minnkota Power Cooperative | 1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Bill | Poppert | info@technologycos.com | Technology North | 2433 Highwood Ave St. Paul, MN 55119 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Michael | Reinertson | michael.reinertson@avantenergy.com | Avant Energy | 220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Dave | Reinke | dreinke@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024-9583 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Richard | Savelkoul | rsavelkoul@martinsquires.com | Martin & Squires, P.A. | 332 Minnesota Street Ste W2750 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Bruce | Sayler | bruces@connexusenergy.com | Connexus Energy | 14601 Ramsey Boulevard Ransey, MN 55303 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Larry L. | Schedin | Larry@LLSResources.com | LLS Resources, LLC | 332 Minnesota St, Ste W1390 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_17-246_M-17-246 |

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|-------------|-----------------|------------------------------------|----------------------------------|--|--------------------|-------------------|------------------------|
| Christopher | Schoenherr | cp.schoenherr@smmpa.org | SMMPA | 500 First Ave SW Rochester, MN 55902-3303 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Cindy | Schweitzer Rott | cindy.schweitzer@clearesult.com | CLEAResult's | S12637A Merrilee Rd. Spring Green, WI 53588 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Anna | Sherman | anna.sherman@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Mall PO Box 59038 Minneapolis, MN 55459 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Ken | Smith | ken.smith@districtenergy.com | District Energy St. Paul Inc. | 76 W Kellogg Blvd St. Paul, MN 55102 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Anna | Sommer | anna@sommerenergy.com | Sommer Energy LLC | PO Box 766 Grand Canyon, AZ 86023 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Grey | Staples | gstaples@mendotagroup.com | The Mendota Group LLC | 1830 Fargo Lane Mendota Heights, MN 55118 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Leo | Steidel | lsteidel@energyplatforms.com | Energy Platforms | 8170 Old Carriage Court N Ste 200 Shakopee, MN 55379 | Paper Service | No | OFF_SL_17-246_M-17-246 |
| Richard | Szydlowski | rszydlowski@mncee.org | Center for Energy & Environment | 212 3rd Ave N Ste 560 Minneapolis, MN 55401-1459 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Steve | Tomac | stomac@becp.com | Basin Electric Power Cooperative | 1717 E Interstate Ave Bismarck, ND 58501 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Stuart | Tommerdahl | stommerdahl@otpc.com | Otter Tail Power Company | 215 S Cascade St PO Box 496 Fergus Falls, MN 56537 | Electronic Service | No | OFF_SL_17-246_M-17-246 |

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|------------|-----------|---------------------------------|---------------------------------------|--|--------------------|-------------------|------------------------|
| 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_17-246_M-17-246 |
| Sharon N. | Walsh | swalsh@shakopeeutilities.com | Shakopee Public Utilities | 255 Sarazin St Shakopee, MN 55379 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Roger | Warehime | warehimer@owatonnautilities.com | Owatonna Public Utilities | 208 South WalnutPO Box 800 Owatonna, MN 55060 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Cam | Winton | cwinton@mnychamber.com | Minnesota Chamber of Commerce | 400 Robert Street North Suite 1500 St. Paul, Minnesota 55101 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| Robyn | Woeste | robynwoeste@alliantenergy.com | Interstate Power and Light Company | 200 First St SE Cedar Rapids, IA 52401 | Electronic Service | No | OFF_SL_17-246_M-17-246 |
| 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_17-246_M-17-246 |

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|------------|-----------|-----------------------------------|------------------------------------|---|--------------------|-------------------|---------------------------------|
| 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 |
| 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 |
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| 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@centerp ointenergy.com | CenterPoint Energy | 800 LaSalle Ave Minneapolis, MN 55402 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |
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| 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 |

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| 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 | jgrenier@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 |

| 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 | SPL_SL__CIP SPECIAL SERVICE LIST |
| Karolanne | Hoffman | kmh@dairynet.com | Dairyland Power Cooperative | PO Box 817 La Crosse, WI 54602-0817 | 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 |
| Erica | Larson | erica.larson@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Avenue P.O. Box 59038 Minneapolis, Minnesota 55459-0038 | 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 |
|------------|------------|---------------------------------|------------------------------------|---|--------------------|-------------------|----------------------------------|
| 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 |
| 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 |
| Scot | 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 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|-------------|-----------------|------------------------------------|------------------------------------|--|--------------------|-------------------|----------------------------------|
| 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 |
| 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 |
| Matt | Okeefe | Matt.okeefe@oracle.com | Oracle | 760 Market St FL 4 San Francisco, CA 94102 | Electronic Service | No | SPL_SL__CIP SPECIAL SERVICE LIST |
| Audrey | Partridge | audrey.peer@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Mall 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 | info@technologycos.com | Technology North | 2433 Highwood Ave St. Paul, MN 55119 | Electronic 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 | CLEARResult'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 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|-------------------------------|------------------------------------|--|--------------------|-------------------|---------------------------------|
| 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 |
| Anna | Sommer | anna@sommerenergy.com | Sommer Energy LLC | PO Box 766 Grand Canyon, AZ 86023 | Electronic 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 |
| Steve | Tomac | stomac@becp.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 55102147 | Electronic Service | No | SPL_SL_CIP SPECIAL SERVICE LIST |