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May 1, 2014

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce**
Docket No. E017/M-14-201

Dear Dr. Haar:

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

 Otter Tail Power Company's (Otter Tail or Company) 2013 Demand Side Management Financial Incentive Project and Annual Filing to Update the CIP [Conservation Improvement Program] Rider (collectively referred to as the Petition).

The Petition was filed on April 1, 2014:

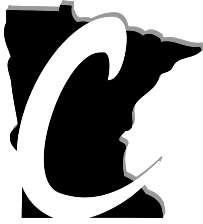
 Kim Pederson
 Manager, Market Planning
 Otter Tail Power company
 215 South Cascade Street
 PO Box 496
 Fergus Falls, MN 56538-0496

The Department will provide its final recommendation after reviewing Otter Tail's Reply Comments. The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ JOHN KUNDERT
Financial Analyst

JK/sm
Attachment



BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET NO. E017/M-14-201

I. SUMMARY OF THE UTILITY'S PROPOSAL

On April 1, 2014, Otter Tail Power Company (Otter Tail or the Company) submitted a filing to the Minnesota Public Utilities Commission (Commission) that contains the following sections:

- *Demand Side Management [DSM] Financial Incentive Project;*
- *Annual Filing to Update the Conservation Improvement Project Rider;*
- *Electric Utility Conservation Cost Recovery Report; and*
- *2013 CIP [Conservation Improvement Program] Status Report (Status Report).*

The first three sections are collectively referred to hereafter as the Petition. The *Status Report* is intended to fulfill the requirements of the Minnesota Department of Commerce, Division of Energy Resources' (Department or DOC) annual CIP reporting rules contained in Minnesota Rules part 7690.0500.

Since the Company's *Status Report* does not require Commission approval, this portion of the Petition has been assigned to a separate docket.

II. THE DEPARTMENT'S 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 2013 DSM financial incentive;
- in Section II.B, Otter Tail's proposed 2013 CIP Tracker Account;
- in Section II.C, Otter Tail's proposed update to the CIP rider; and
- in Section II.D, a review of Otter Tail's CIP activities for the period 2008 through 2013.

A. OTTER TAIL'S PROPOSED DSM FINANCIAL INCENTIVE FOR 2013

1. Background and Summary of Otter Tail's Proposed 2013 DSM Incentive

Under the Shared Savings DSM financial incentive plan approved by the Commission in Docket No. E,G999/CI-08-133, Otter Tail may request Commission approval of a performance bonus based on the percent of net benefits that the Company achieves. The Commission's January 27, 2010 Order explains the incentive as follows:

The New 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 new approach 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 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 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 \$0.09 times the number of kWh saved and gas utilities will earn at a range from \$4.50 to \$6.50 times the number of thousand cubic feet (Mcf) saved.

Importantly, the incremental incentive per additional energy savings achieved is higher than the average incentive achieved. Thus, the closer the energy savings is to reaching the 1.5 percent energy savings goal, the greater

the incremental incentive. However, the incentive is still less than the net benefits created through the savings, therefore reserving a majority of the net benefits for ratepayers.

Mandated assessments to utilities will not be included in the calculation of net benefits. Further, as agreed to by the working group, a utility can elect before the beginning of each year whether to include third party programs in its incentive calculation. The costs and benefits of non-elected third party programs will not be included in the calculation.

The incentive for Otter Tail is triggered when the Company achieves 50 percent of the utility's average achievements for the period 2005 to 2009, removing both the maximum and minimum achievements, or at 0.4 percent of retail sales, whichever is lowest. The incentive is capped at 11.25 cents per first-year kWh.

Otter Tail estimated that its 2013 achievements resulted in \$32,764,856 of net benefits. Otter Tail also stated in its Petition that its CIP activities achieved energy savings in 2013 of 35,792,002 kWh, which is approximately 1.67 percent of Otter Tail's weather-normalized sales of 2,142,354,181 kWh. Based on the terms and conditions of its approved DSM incentive plan, Otter Tail requests recovery of a DSM financial incentive of \$4,026,600 for 2013, which is approximately 77 percent (\$4,026,600/\$5,253,935) of the Company's 2013 CIP expenditures.

2. The Department's Review of Otter Tail's Proposed 2013 DSM Incentive

Otter Tail estimated that its 2013 performance should result in a Shared Savings DSM financial incentive of \$4,026,600. Otter Tail's 2013 energy savings of 35,792,002 kWh were sixteen percent higher than the Company's 2012 estimated energy savings of 27,957,635 and two percent higher than the Company's all-time best estimated energy savings of 35,706,319 kWh in 2009.

The Department's engineering-oriented analysis of the demand and energy savings that underpin Otter Tail's proposed 2013 DSM financial incentive of \$4,026,600 is ongoing. In all likelihood, it will not be completed before the fall of 2014. The existence of this lag between the Company's request for recovery of the incentive and the completion of the Department's engineering review is a recurring phenomenon. In 2013, the Department compensated for this lag by simply assuming OTP's claimed energy savings for 2012 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 2013 Status Report, without any adjustments, in Docket No. E017/CIP-10-356.02 and thus none need to be made in the instant docket.

In the event that the Deputy Commissioner of the Department approves different 2013 CIP energy savings or budget, the Commission can approve any adjustments to the Company's DSM financial incentive for 2013 achievements as part of the Company's 2014 filing that will be made April 1, 2015.

B. OTTER TAIL'S 2013 CIP TRACKER ACCOUNT

In its Petition, Otter Tail requests approval of its CIP Tracker account balance which includes the Company's recoveries and expenditures during 2013. Activity in Otter Tail's CIP tracker account during 2013 is summarized below in Table 1.

Table 1: Summary Of Otter Tail's CIP Tracker Account in 2013

Description	Time Period	Amount
Beginning Balance	December 31, 2012	\$3,572,621
CIP Expenses	January 1 through December 31, 2013	\$5,253,935
DSM Financial Incentive	Approved in 2013 for 2012	\$2,681,575
Carrying Charges	January 1 through December 31, 2013	\$237,859
Combined Base Rate and CCRA Recovery	January 1 through December 31, 2013	(\$6,910,431)
Ending Balance	December 31, 2013	\$4,835,558

The Department reviewed Otter Tail's CIP Tracker account and concludes that the Company correctly calculated its CIP tracker account for 2013. Thus, the Department recommends that the Commission approve Otter Tail's 2013 CIP Tracker account as summarized in Table 1. In the event that the Deputy Commissioner of the Department proposes an adjustment to the 2013 CIP savings budget for the Company, the Commission can approve any adjustments to the Company's DSM financial incentive for 2013 achievements as part of the Company's 2014 filing.

C. OTTER TAIL'S PROPOSED UPDATE TO THE CIP RIDER

1. Conservation Cost Recovery Adjustment (CCRA)

OTP's approved CCRA (CIP adjustment rate) is \$0.00175 per kWh, as approved by the Commission on October 15, 2013 in Docket No. E017/M-13-171. For July 2014 through June 2015, Otter Tail is proposing a change in the surcharge to \$0.00209/kWh or an increase of 19 percent over the Company's current surcharge.

Under Otter Tail's proposal the Company's CIP tracker balance would be \$4,263,408 on June 30, 2015. OTP estimates that its proposed increase in the CCRA would increase an average residential customer's bill by \$0.28/month or 0.34%. The Company estimates that the carrying

costs associated with this proposal for the July 1, 2014 through June 30, 2015 time period would be equal to \$487,263.

The Department is concerned that given the rate of increase in CIP program expenses and the incentive awards the Company has achieved, OTP's proposed CCRA rate will not recover a sufficient amount of the unrecovered costs the Company has incurred to date and will likely incur in 2015. Table 2 summarizes this information. Consequently, the Department is recommending that the Commission consider increasing the CCRA to a level above that proposed by OTP.

Reviewing the information in Table 2 below, from 2006 through 2015 the Department estimates that OTP will have increased its annual achieved energy savings by a total of 125%. At the same time, its annual CIP expenditures will have increased by 189%. While these two percentages are not identical, they mirror one another to a large degree. The same relationship does not hold for the amount the Company collects annually in carrying charges and the year-end tracker balance. The annual amount it collects in carrying charges will have increased by 623% and the year-end tracker balance by 451%. These results suggest that one result of OTP's reluctance to raise the CCRA rate is that it is under-recovering the CIP-related expenses included in the tracker.

As a result, the annual carrying charges that OTP collects on the tracker balance have also increased both in nominal terms and as a percentage of annual CIP expenditures. The Department estimates that OTP will book \$416,017 in carrying charge expenses in calendar year 2014 and \$472,375 in calendar year 2015. These amounts will represent 7.39 and 8.44 percent of the Company's annual CIP expenditures for those same years.

Table 2: Comparison of Selected CIP Program Statistics – 2006 through 2015

	Achieved Energy Savings (MWh)	CIP Expenditures (\$/yr)	Carrying Charges (\$/yr)	Carrying Charges/ Expenditures (%)	DSM Financial Incentive (\$/yr)	Year-End Tracker Balance (\$)
2006	13,984	\$1,938,812	\$65,371	3.37%	\$158,363	\$1,035,608
2007	11,469	\$1,862,697	\$53,025	2.85%	\$25,066	\$490,713
2008	15,995	\$2,345,874	(\$4,830)	-0.21%	\$273,798	\$265,056
2009	35,706	\$4,093,050	\$26,437	0.65%	\$1,101,060	\$1,927,314
2010	31,793	\$4,984,050	\$146,441	2.94%	\$3,531,538	\$3,721,665
2011	27,958	\$4,344,581	\$221,862	5.11%	\$2,608,098	\$5,188,129
2012	30,794	\$4,816,994	\$222,097	4.61%	\$2,681,575	\$3,572,621
2013	35,792	\$5,253,935	\$237,859	4.53%	\$4,026,600	\$4,835,558
2014*	31,485	\$5,628,738	\$416,017	7.39%	\$2,213,974	\$6,648,566
2015*	31,485	\$5,595,495	\$472,375	8.44%	\$2,213,974	\$5,708,014
Total % Change	125%	189%	623%	NA	NA	451%

* Estimated

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. One reason for this position is the Department's goal to minimize the carrying costs associated with the CIP tracker.

Consequently, the Department provides the following high-low analysis that identifies:

- A high CCRA scenario that would eliminate the existing under-recovery by June 30, 2015.
- A medium CCRA scenario that would help to mitigate this ongoing under-recovery. The Department identified a \$1.0 million under-recovery as the goal of the proposed change to the CCRA. The date this goal would be achieved was identified as December 31, 2015.
- A low scenario based on the Company's proposed CCRA that would result in the under-recovered CIP Tracker Balances identified in Table 2.

Regarding the high scenario, the Department estimates that the CCRA would need to increase to \$0.00388/kWh effective July 1, 2014 in order to eliminate the existing under-recovery by June 30, 2015. This change would represent a 122 percent increase in the existing CCRA of \$0.00175/kWh. The increase in the CCRA cost to a residential ratepayer would be \$1.76/month under this scenario. The monthly bill impact for a residential ratepayer would be equal to 2.11%.

The medium CCRA scenario's decision criteria were selected with an eye towards mitigating rate shock while providing an adequate amount of time for the new CCRA to be in effect. The \$1.0 million under-recovered CIP tracker balance would decrease the amount of the under-recovery that the new CCRA would need to recover. The eighteen-month time frame would allow more time for the new CCRA to be in effect relative to the normal twelve-month period.

A CCRA of \$0.00350/kWh would meet the threshold criteria identified in the medium CCRA scenario. This change would represent a 100 percent increase in the existing CCRA of \$0.00175/kWh. The increase in the CCRA cost to a residential ratepayer would be \$1.44/month under this scenario. The monthly bill impact for a residential ratepayer would be equal to 1.74%.

Table 3 summarizes the impacts of the three scenarios for OTP's residential rate class. The effects of the different CCRA's on the forecasted tracker balances and carrying charges are presented in greater detail in Attachment 1. The effects of the three CCRA's on average monthly bills are presented in greater detail in Attachment 2.

Table 3: Comparison of CCRA's, Percentage Increase in Monthly Bill for an Average Residential Customer and Forecasted June 30, 2015 CIP Tracker Balances

Scenario	Proposed CCRA (\$/kWh)	Percentage increase in Monthly Bill for an Average Customer (%)	June 30, 2015 Forecasted Tracker Balance (\$)
High	\$0.00388/kWh	2.11%	(\$15,841)
Medium*	\$0.00350/kWh	1.74%	\$892,603
Low	\$0.00209/kWh	0.34%	\$4,263,411

*This scenario also produces a December 31, 2015 CIP Tracker Balance of \$1,077,466, which is consistent with the decision criteria identified in the scenario.

All three scenarios share the following assumptions:

- No change to the existing per-kWh CIP rate included in base rates through December 31, 2015;
- Forecasted energy sales for January 2014 through June 2015 equal those included in Exhibit 1 of the CCRA section of the Petition:
- Forecasted energy sales for August 2015 through December 2015 based on the Company's forecasted sales for the same period in 2014.

Table 4 summarizes the year-ending tracker balances for 2014 and 2015, as well as the annual estimated carrying charges for the three scenarios.

Table 4: Comparison of High, Medium and Low CCRA Recovery Scenarios – December-Ending 2014 and 2015 CIP Tracker Balances and Annual Carrying Charges

Description	December Ending 2014 Tracker Balance	2014 Carrying Charge (\$/yr)	December Ending 2015 Tracker Balance	2015 Carrying Charge (\$/yr)
High	\$4,637,980	\$381,425	(\$297,624)	\$128,687
Medium	\$5,064,808	\$388,768	\$1,077,466	\$203,372
Low	\$6,648,566	\$416,017	\$5,708,014	\$472,375

The information in Table 4 suggests that OTP's current proposed rates and cost recovery approach (low scenario) would not provide an adequate amount of revenue to offset the combination of the existing under-recovery in the CIP tracker and ongoing program expenses. The estimated December 31, 2014 tracker balance would be \$6.6 million under-recovered, an all-

time high for the program. Assuming another 20% increase to the Company-proposed CCRA on July 1, 2015 results in a decrease in the tracker balance of \$940,552 to \$5.7 million on December 31, 2015.

After reviewing the information in Tables 3 and 4, the Department recommends that the Commission adopt the \$0.0035/kWh CCRA effective July 1, 2014. This is the CCRA derived in the medium scenario. The Department believes that this level of CCRA combined with one of the alternative cost-recovery scenarios identified in the following section would produce a reasonable, balanced result for OTP's ratepayers.

2013 CIP Incentive Cost Recovery Scenarios

The Company has requested an incentive for 2013 of \$4,026,600. The information included in the Petition assumes this incentive would be booked to the CIP tracker in its entirety on July 1, 2014. Given the magnitude of this incentive and the extent of the under-recovered balance in the CIP Tracker, the Department modified the proposed cost recovery assumption associated with the 2013 incentive in the medium scenario to determine the effect of changing that assumption.

The Department analyzed three variations on the medium scenario; each differs in the timing of when OTP would book its financial incentive. Specifically:

- Smoothed July – OTP would book its proposed 2013 incentive in twelve equal monthly installments of \$335,550.
- Lump Sum October – The Company would wait to book its 2013 incentive until October 1, 2014.
- Smoothed October – OTP would book its proposed 2013 incentive in nine equal monthly installments of \$447,400 beginning on October 1, 2014.

All three variations assume that proposed changes to the cost-recovery timing of the 2013 incentive would apply only to that annual incentive. All variations assume that the estimated 2014 incentive of \$2.2 million would be booked in its entirety on July 1, 2015. Table 5 contains this information.

Table 5: 2013 CIP Incentive Cost Recovery Variations under Medium CCRA Scenario

Variation	December Ending 2014 Tracker Balance	2014 Carrying Charge (\$/yr)	December Ending 2015 Tracker Balance	2015 Carrying Charge (\$/yr)
Medium (Base Case)	\$5,064,808	\$388,768	\$1,077,466	\$203,372
Smoothed July	\$2,941,427	\$278,687	\$903,472	\$139,460
Lump Sum - October	\$4,976,255	\$300,215	\$980,980	\$195,439
Smoothed October	\$2,243,519	\$251,880	\$856,246	\$119,042

These three variations rest on the assumption that it is reasonable to require the Company to absorb some portion of the carrying costs associated with the 2013 incentive. The differences in the December 31, 2015 tracker balances provide partial estimates of the direct costs of these scenarios to OTP. These range from a high of \$84,330 for the Smoothed October variation (\$203,372 - \$119,042) to \$7,933 for the Lump Sum October variation (\$203,372 - \$195,042).

The Department requests that OTP provide a discussion in Reply Comments regarding whether it is reasonable for the Company to delay initiating the recovery of its 2013 incentive until October 1, 2014 and then recover the incentive in equal installments over the subsequent nine months. Delaying recovery would help to offset a portion of the carrying costs included in the tracker balance and would eventually have a mitigating effect on future increases in the CCRA.

2. Variance Request

Otter Tail requests renewal of two 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
- A variance from Minnesota Rules part 7825.2600, which states that the Fuel Clause Adjustment (FCA) should be stated on a per-kWh basis on customer bills.

OTP seeks a variance of these two rules so that the Company can combine the FCA and CIP adjustment rate on one bill line-item called a "Resource Adjustment."

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 states 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 states 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 states 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.

D. HISTORY OF OTTER TAIL'S CIP ACHIEVEMENTS AND FINANCIAL INCENTIVES

Table 4 below, reproduced from OTP's Petition summarizes the Company's DSM financial incentives, CIP expenditures, reported energy savings and first-year average cost per kWh saved between 2007 and 2013.

Table 4: History of Otter Tail's CIP Achievements, Expenditures and Incentives (2008-2013)

	2008	2009	2010	2011	2012	2013
DSM Financial Incentive	\$273,798	\$1,101,060	\$3,531,538	\$2,608,098	\$2,681,575	\$4,026,600
CIP Expenditures (\$/yr)	\$2,345,874	\$4,093,050	\$4,984,050	\$4,344,581	\$4,816,994	\$5,253,935
Achieved Energy Savings (MWh)	15,995	35,706	31,793	27,958	30,794	35,792
Expenditures per First Year Kwh Saved	\$0.15	\$0.11	\$0.16	\$0.16	\$0.16	\$0.15

As indicated in Table 4, Otter Tail's 2013 energy savings are higher than its previous record (2009), and more than double the energy savings achieved 2006-2008. Otter Tail's 2013 average cost per kWh saved is the same as in 2008 and below those estimated from 2010 through 2012.

III. THE DEPARTMENT'S RECOMMENDATIONS

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

1. The Commission approve Otter Tail's CIP tracker account, as summarized in Table 1 above.
2. The Commission approve an incentive of \$4,026,600 for Otter Tail's 2013 CIP achievements.
3. The Commission 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

The Department will make a recommendation on the appropriate level of the CCRA once it has reviewed the Company's Reply Comments.

/sm

ATTACHMENT 1

Comparison of OTP and DOC CCRA Recovery Scenarios – Calendar Year 2014 and 2015 Tracker Balances and Annual Carrying Charges

Otter Tail Power (OTP or Company) identified a 2013 year-end tracker balance of \$4.8 million under-recovered in Docket No. E017/M-14-201. In an effort to bring the recovery of CIP related costs and incentives into line with the level of costs incurred, OTP proposed a 19 percent increase in the Conservation Cost Recovery Adjustment (CCRA). This proposed increase would increase the CCRA from the current level of \$0.00175/kWh to \$0.00209/kWh. The Company used a June-ending perspective in the analysis it included in the CCRA section of its *Petition*. This perspective is useful in that the proposed changes to the CCRA are usually effective July 1st. The Department elected to use a calendar year perspective in its analysis. This perspective appeared to be more useful relative to annual comparisons for the different components of the CIP tracker.

Attachment 1 contains the spreadsheets that summarize the high, medium and low (Company) scenarios discussed in the Department's comments. Each scenario included in a spreadsheet CIP tracker expenses and revenues through December 31, 2015. The Department mimicked the OTP estimates included in Exhibit 1 in the CCRA section of the *Petition* to the extent possible through June 30, 2015. The Department then extended the analysis through December 31, 2015 while making use of several conservative assumptions:

- Forecasted sales figures for the last six months of 2015 that are identical to the sales figures for the last six months of 2014.
- CIP expenses for the last six months of 2015 that are identical to those for the last six months of 2014; and
- A 2014 CIP incentive of \$2,213,974.
- An increase of 20% in the proposed CCRA of \$0.0209/kWh to \$0.0251/kWh effective July 1, 2015.

Attachments 1-1, 1-2 and 1-3 contain the high, medium and low scenarios discussed in the Department's comments.

The high scenario (Attachment 1-1) assumes that the CCRA is increased to \$0.00388/kWh effective July 1, 2014 and that it remains at that level through December 31, 2015.

The medium scenario (Attachment 1-2) assumes that the CCRA is increased to \$0.00350/kWh effective July 1, 2014 and that it remains at that level through December 31, 2015.

The low scenario (Attachment 1-2) assumes that the CCRA is increased to \$0.00209/kWh effective July 1, 2014 and that it remains at that level through June 30, 2015. The CCRA is then increased another twenty percent to \$0.00251/kWh effective July 1, 2015 through the end of the study period – December 31, 2015.

Attachments 1-2.a, 1-2.b and 1-2.c contain the Department's sensitivities on the timing of the cost-recovery of the 2013 CIP incentive. All three sensitivities use all the same assumptions as those listed for the Medium scenario.

Attachment 1-2.a contains the "Smoothed" variation which assumes that OTP books the 2013 incentive in twelve equal monthly installments of \$335,550 beginning on July 1, 2014.

Attachment 1-2.b contains the "Lump-sum October" variation assumes that OTP elects to wait until October 1, 2014 to book the 2013 incentive. Attachment 1-2.c contains the "Smoothed October" variation assumes that OTP waits until October 1, 2014 to begin to recover its 2013 incentive and that it recovers the incentive in nine equal monthly installments of \$447,400.

Not surprisingly, the DOC scenarios result in lower CIP tracker balances and annual carrying charge expenses in 2014 and 2015 as the combination of the increased revenue generated by the higher CCRA lowers the amount of the under-recovery in the Medium scenario. The changes in timing to the recovery of the 2013 incentive in the Smoothed, Lump-sum October and Smoothed October variations decrease the monthly tracker balances for the time period between July 1, 2014 and June 30, 2015 for the last three cases.

CIP Tracker and Calculation of Proposed CCRA

[illegible]

CIP Tracker and Calculation of Proposed CCRA

Line No.	Calendar Year 2014												Calendar Year 2015
	Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14	Aug-14	Sep-14	Oct-14	Nov-14	Dec-14	
1.	\$ 4,935,558	\$ 4,282,914	\$ 3,858,226	\$ 3,446,739	\$ 3,198,154	\$ 3,012,977	\$ 2,912,807	\$ 2,828,547	\$ 2,609,921	\$ 2,648,540	\$ 2,736,243	\$ 2,470,802	
2.	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	
3.	\$ 34,695	\$ 30,730	\$ 27,683	\$ 24,730	\$ 22,947	\$ 21,618	\$ 20,899	\$ 20,295	\$ 18,726	\$ 19,003	\$ 19,633	\$ 17,728	
4.	\$ 243,419	\$ 398,618	\$ 225,458	\$ 357,342	\$ 351,492	\$ 450,980	\$ 480,634	\$ 374,799	\$ 599,666	\$ 622,799	\$ 376,389	\$ 1,207,142	
5.	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 335,550	\$ 335,550	\$ 335,550	\$ 335,550	\$ 335,550	\$ 335,550	
6.	\$ (411,864)	\$ (393,678)	\$ (329,441)	\$ (312,603)	\$ (277,389)	\$ (283,908)	\$ (303,585)	\$ (312,786)	\$ (301,601)	\$ (293,141)	\$ (325,518)	\$ (359,089)	
7.	\$ (418,894)	\$ (400,358)	\$ (335,187)	\$ (318,055)	\$ (282,227)	\$ (288,860)	\$ (617,759)	\$ (636,484)	\$ (613,722)	\$ (596,509)	\$ (668,495)	\$ (730,705)	
8.	\$ 4,282,914	\$ 3,858,226	\$ 3,446,739	\$ 3,198,154	\$ 3,012,977	\$ 2,912,807	\$ 2,828,547	\$ 2,609,921	\$ 2,648,540	\$ 2,736,243	\$ 2,470,802	\$ 2,941,427	
9.	\$ 0.00175						\$ 0.00350						
10.	\$ 239,456,033	\$ 228,882,742	\$ 191,535,304	\$ 181,745,662	\$ 161,272,399	\$ 165,062,680	\$ 176,502,660	\$ 181,852,458	\$ 175,349,218	\$ 170,431,006	\$ 190,998,588	\$ 208,772,892	
11.	\$ 0.0017200	\$ 0.0017200	\$ 0.0017200	\$ 0.0017200	\$ 0.0017200	\$ 0.0017200	\$ 0.00172	\$ 0.00172	\$ 0.00172	\$ 0.00172	\$ 0.00172	\$ 0.00172	
12.	\$ 2,941,427	\$ 2,411,389	\$ 1,833,458	\$ 1,351,860	\$ 1,051,335	\$ 851,391	\$ 725,916	\$ 2,504,389	\$ 1,947,887	\$ 1,646,206	\$ 1,391,167	\$ 780,525	
13.	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	\$ 0.0072	
14.	\$ 21,105	\$ 17,302	\$ 13,155	\$ 9,700	\$ 7,543	\$ 6,109	\$ 5,208	\$ 17,969	\$ 13,976	\$ 11,812	\$ 9,982	\$ 5,600	
15.	\$ 293,196	\$ 255,598	\$ 225,458	\$ 357,342	\$ 351,492	\$ 450,980	\$ 480,634	\$ 374,799	\$ 599,666	\$ 622,799	\$ 376,389	\$ 1,207,142	
16.	\$ 335,550	\$ 335,550	\$ 335,550	\$ 335,550	\$ 335,550	\$ 335,550	\$ 2,213,974	\$ -	\$ -	\$ -	\$ -	\$ -	
17.	\$ (388,776)	\$ (390,915)	\$ (347,875)	\$ (330,529)	\$ (294,749)	\$ (302,520)	\$ (303,585)	\$ (312,786)	\$ (301,601)	\$ (293,141)	\$ (328,518)	\$ (359,089)	
18.	\$ (791,113)	\$ (795,466)	\$ (707,885)	\$ (672,588)	\$ (599,780)	\$ (615,594)	\$ (617,759)	\$ (636,484)	\$ (613,722)	\$ (596,509)	\$ (668,495)	\$ (730,705)	
19.	\$ 2,411,389	\$ 1,833,458	\$ 1,351,860	\$ 1,051,335	\$ 851,391	\$ 725,916	\$ 2,504,389	\$ 1,947,887	\$ 1,646,206	\$ 1,391,167	\$ 780,525	\$ 903,472	
20.							\$ 0.00350						
21.	\$ 226,032,294	\$ 227,276,122	\$ 202,252,917	\$ 192,168,059	\$ 171,365,689	\$ 175,883,876	\$ 176,502,660	\$ 181,852,458	\$ 175,349,218	\$ 170,431,006	\$ 190,998,588	\$ 208,772,892	
22.	\$ 0.00172	\$ 0.00172	\$ 0.00172	\$ 0.00172	\$ 0.00172	\$ 0.00172	\$ 0.00172	\$ 0.00172	\$ 0.00172	\$ 0.00172	\$ 0.00172	\$ 0.00172	

Medium Scenario - Lump-Sum October Sensitivity - OTP agrees to recover 2013 incentive on October 1, 2014.

CIP Tracker and Calculation of Proposed CCRA

[illegible]

Attachment 1-2.c
Medium Scenario - Smoothed October Sensitivity - OTP agrees to recover 2013 incentive in nine equal monthly installments beginning on October 1, 2014.
CIP Tracker and Calculation of Proposed CCRA

[illegible]

[illegible]

ATTACHMENT 2

Bill Comparisons for high, medium and low Scenarios

This attachment contains information on that compares the impacts of the different CCRA's proposed in the high, medium and low scenarios and summarizes that information.

Comparison of Monthly Bill Impacts for Different Scenarios (\$ and %) by Customer Class

Line No.	Rate Class	Monthly Bill \$ Change by Class by Scenario			Monthly Bill % Change by Class by Scenario		
		High	Medium	Low	High	Medium	Low
1.	Residential	\$1.76	\$1.45	\$0.28	2.11%	1.74%	0.34%
2.	Farm	\$4.67	\$3.84	\$0.74	2.39%	1.97%	0.38%
3.	General Service	\$5.63	\$4.62	\$0.90	2.35%	1.92%	0.37%
4.	Large General Service	\$449.50	\$369.31	\$71.75	3.43%	2.82%	0.55%
5.	Irrigation	\$3.96	\$3.25	\$0.63	3.13%	2.57%	0.50%
6.	Outdoor Lighting	\$0.17	\$0.14	\$0.02	1.45%	1.19%	0.17%
7.	Municipal Pumping	\$6.97	\$5.73	\$1.11	2.93%	2.41%	0.47%
8.	Water Heating, Cntl	\$0.46	\$0.38	\$0.07	2.79%	2.31%	0.43%
9.	Interrruptible Load	\$4.17	\$3.42	\$0.66	4.15%	3.40%	0.66%
10.	Deferred Load	\$3.96	\$3.25	\$0.63	3.97%	3.26%	0.63%

Comparison of Monthly Bill Impacts for Different Scenarios (\$ and %) by Customer Class
High Scenario - Comparison of Monthly Bill Impacts

Line No.	Rate Class	Average Usage (kWh/month)	Current CCRA (\$/kWh)	Current CCRA/Month (\$/Mon)	Proposed CCRA (\$/kWh)	Proposed CCRA/Month (\$/Mon)	Change in Monthly CCRA (\$/mon)
1.	Residential	825	\$0.00175	\$1.44	\$0.003880	\$3.20	\$1.76
2.	Farm	2,193	\$0.00175	\$3.84	\$0.003880	\$8.51	\$4.67
3.	General Service	2,644	\$0.00175	\$4.63	\$0.003880	\$10.26	\$5.63
4.	Large General Service	211,031	\$0.00175	\$369.30	\$0.003880	\$818.80	\$449.50
5.	Irrigation	1,858	\$0.00175	\$3.25	\$0.003880	\$7.21	\$3.96
6.	Outdoor Lighting	83	\$0.00175	\$0.15	\$0.003880	\$0.32	\$0.17
7.	Municipal Pumping	3,273	\$0.00175	\$5.73	\$0.003880	\$12.70	\$6.97
8.	Water Heating, Cntl	216	\$0.00175	\$0.38	\$0.003880	\$0.84	\$0.46
9.	Interruptionable Load	1,958	\$0.00175	\$3.43	\$0.003880	\$7.60	\$4.17
10.	Deferred Load	1,857	\$0.00175	\$3.25	\$0.003880	\$7.21	\$3.96

	Rate Class	Average Bill before CCRA (\$/mon)	Current CCRA/Month (\$/Mon)	Average Bill with Current CCRA (\$/mon)	Proposed CCRA/Month (\$/Mon)	Average Bill with Proposed CCRA (\$/mon)	Monthly Bill Impact (%)
11.	Residential	\$82.12	\$1.44	\$83.56	\$3.20	\$85.32	2.11%
12.	Farm	\$191.52	\$3.84	\$195.36	\$8.51	\$200.03	2.39%
13.	General Service	\$235.45	\$4.63	\$240.08	\$10.26	\$245.71	2.35%
14.	Large General Service	\$12,728.51	\$369.30	\$13,097.81	\$818.80	\$13,547.31	3.43%
15.	Irrigation	\$123.44	\$3.25	\$126.69	\$7.21	\$130.65	3.13%
16.	Outdoor Lighting	\$11.61	\$0.15	\$11.76	\$0.32	\$11.93	1.45%
17.	Municipal Pumping	\$232.32	\$5.73	\$238.05	\$12.70	\$245.02	2.93%
18.	Water Heating, Cntl	\$16.09	\$0.38	\$16.47	\$0.84	\$16.93	2.79%
19.	Interruptionable Load	\$97.04	\$3.43	\$100.47	\$7.60	\$104.64	4.15%
20.	Deferred Load	\$96.40	\$3.25	\$99.65	\$7.21	\$103.61	3.97%

Comparison of Monthly Bill Impacts for Different Scenarios (\$ and %) by Customer Class
Medium Scenario - Comparison of Monthly Bill Impacts

Line No.	Rate Class	Average Usage (kWh/month)	Current CCRA (\$/kWh)	Current CCRA/Month (\$/Mon)	Proposed CCRA (\$/kWh)	Proposed CCRA/Month (\$/Mon)	Change in Monthly CCRA (\$/mon)
1.	Residential	825	\$0.00175	\$1.44	\$0.00350	\$2.89	\$1.45
2.	Farm	2,193	\$0.00175	\$3.84	\$0.00350	\$7.68	\$3.84
3.	General Service	2,644	\$0.00175	\$4.63	\$0.00350	\$9.25	\$4.62
4.	Large General Service	211,031	\$0.00175	\$369.30	\$0.00350	\$738.61	\$369.31
5.	Irrigation	1,858	\$0.00175	\$3.25	\$0.00350	\$6.50	\$3.25
6.	Outdoor Lighting	83	\$0.00175	\$0.15	\$0.00350	\$0.29	\$0.14
7.	Municipal Pumping	3,273	\$0.00175	\$5.73	\$0.00350	\$11.46	\$5.73
8.	Water Heating, Cntl	216	\$0.00175	\$0.38	\$0.00350	\$0.76	\$0.38
9.	Interrruptible Load	1,958	\$0.00175	\$3.43	\$0.00350	\$6.85	\$3.42
10.	Deferred Load	1,857	\$0.00175	\$3.25	\$0.00350	\$6.50	\$3.25

Line No.	Rate Class	Average Bill before CCRA (\$/mon)	Current CCRA/Month (\$/Mon)	Average Bill with Current CCRA (\$/mon)	Proposed CCRA/Month (\$/Mon)	Average Bill with Proposed CCRA (\$/mon)	Monthly Bill Impact (%)
11.	Residential	\$82.12	\$1.44	\$83.56	\$2.89	\$85.01	1.74%
12.	Farm	\$191.52	\$3.84	\$195.36	\$7.68	\$199.20	1.97%
13.	General Service	\$235.45	\$4.63	\$240.08	\$9.25	\$244.70	1.92%
14.	Large General Service	\$12,728.51	\$369.30	\$13,097.81	\$738.61	\$13,467.12	2.82%
15.	Irrigation	\$123.44	\$3.25	\$126.69	\$6.50	\$129.94	2.57%
16.	Outdoor Lighting	\$11.61	\$0.15	\$11.76	\$0.29	\$11.90	1.19%
17.	Municipal Pumping	\$232.32	\$5.73	\$238.05	\$11.46	\$243.78	2.41%
18.	Water Heating, Cntl	\$16.09	\$0.38	\$16.47	\$0.76	\$16.85	2.31%
19.	Interrruptible Load	\$97.04	\$3.43	\$100.47	\$6.85	\$103.89	3.40%
20.	Deferred Load	\$96.40	\$3.25	\$99.65	\$6.50	\$102.90	3.26%

Comparison of Monthly Bill Impacts for Different Scenarios (\$ and %) by Customer Class
Low Scenario - Comparison of Monthly Bill Impacts

Line No.	Rate Class	Average Usage (kWh/month)	Current CCRA (\$/kWh)	Current CCRA/Month (\$/Mon)	Proposed CCRA (\$/kWh)	Proposed CCRA/Month (\$/Mon)	Change in Monthly CCRA (\$/mon)
1.	Residential	825	\$0.00175	\$1.44	\$0.00209	\$1.72	\$0.28
2.	Farm	2,193	\$0.00175	\$3.84	\$0.00209	\$4.58	\$0.74
3.	General Service	2,644	\$0.00175	\$4.63	\$0.00209	\$5.53	\$0.90
4.	Large General Service	211,031	\$0.00175	\$369.30	\$0.00209	\$441.05	\$71.75
5.	Irrigation	1,858	\$0.00175	\$3.25	\$0.00209	\$3.88	\$0.63
6.	Outdoor Lighting	83	\$0.00175	\$0.15	\$0.00209	\$0.17	\$0.02
7.	Municipal Pumping	3,273	\$0.00175	\$5.73	\$0.00209	\$6.84	\$1.11
8.	Water Heating, Cntl	216	\$0.00175	\$0.38	\$0.00209	\$0.45	\$0.07
9.	Interruption Load	1,958	\$0.00175	\$3.43	\$0.00209	\$4.09	\$0.66
10.	Deferred Load	1,857	\$0.00175	\$3.25	\$0.00209	\$3.88	\$0.63

	Rate Class	Average Bill before CCRA (\$/mon)	Current CCRA/Month (\$/Mon)	Average Bill with Current CCRA (\$/mon)	Proposed CCRA/Month (\$/Mon)	Average Bill with Proposed CCRA (\$/mon)	Monthly Bill Impact (%)
11.	Residential	\$82.12	\$1.44	\$83.56	\$1.72	\$83.84	0.34%
12.	Farm	\$191.52	\$3.84	\$195.36	\$4.58	\$196.10	0.38%
13.	General Service	\$235.45	\$4.63	\$240.08	\$5.53	\$240.98	0.37%
14.	Large General Service	\$12,728.51	\$369.30	\$13,097.81	\$441.05	\$13,169.56	0.55%
15.	Irrigation	\$123.44	\$3.25	\$126.69	\$3.88	\$127.32	0.50%
16.	Outdoor Lighting	\$11.61	\$0.15	\$11.76	\$0.17	\$11.78	0.17%
17.	Municipal Pumping	\$232.32	\$5.73	\$238.05	\$6.84	\$239.16	0.47%
18.	Water Heating, Cntl	\$16.09	\$0.38	\$16.47	\$0.45	\$16.54	0.43%
19.	Interruption Load	\$97.04	\$3.43	\$100.47	\$4.09	\$101.13	0.66%
20.	Deferred Load	\$96.40	\$3.25	\$99.65	\$3.88	\$100.28	0.63%

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-14-201

Dated this **1st** day of **May 2014**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
George	Agriesti		Minnesota Power	30 W Superior St Duluth, MN 55802	Paper Service	No	OFF_SL_14-201_M-14-201
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_14-201_M-14-201
Julie Rae	Ambach	jambach@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	OFF_SL_14-201_M-14-201
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_14-201_M-14-201
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_14-201_M-14-201
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_14-201_M-14-201
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	OFF_SL_14-201_M-14-201
William A.	Blazar	bblazar@mnychamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-201_M-14-201
Michael	Bradley	mike.bradley@lawmoss.com	Moss & Barnett	Suite 4800 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	OFF_SL_14-201_M-14-201
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson & Byron, P.A.	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_14-201_M-14-201
Richard G	Burud	rburud@noblesce.com	Nobles Cooperative Electric	22636 US HIGHWAY 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_14-201_M-14-201

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gary	Chesnut	gchesnut@agp.com	AG Processing Inc. a cooperative	12700 West Dodge Road PO Box 2047 Omaha, NE 681032047	Electronic Service	No	OFF_SL_14-201_M-14-201
Gary	Connett		Great River Energy	12300 Elm Creek Blvd N Maple Grove, MN 553694718	Paper Service	No	OFF_SL_14-201_M-14-201
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174 Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_14-201_M-14-201
Jill	Curran	jcurran@mnychamber.com	Minnesota Waste Wise	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_14-201_M-14-201
Jeffrey A.	Daugherty	jeffrey.daugherty@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-201_M-14-201
Executive	Director	N/A	Sustainable Resources Center	1081 10th Ave SE Minneapolis, MN 55414	Paper Service	No	OFF_SL_14-201_M-14-201
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_14-201_M-14-201
Chris	Duffrin	chrisd@thenec.org	Neighborhood Energy Connection	624 Selby Avenue St. Paul, MN 55104	Electronic Service	No	OFF_SL_14-201_M-14-201
Jim	Erchul		Daytons Bluff Neighborhood Housing Sv.	823 E 7th St St. Paul, MN 55106	Paper Service	No	OFF_SL_14-201_M-14-201
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_14-201_M-14-201

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl Northfield, MN 55057	Electronic Service	No	OFF_SL_14-201_M-14-201
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_14-201_M-14-201
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_14-201_M-14-201
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Paper Service	No	OFF_SL_14-201_M-14-201
Kelsey	Genung	kelsey.genung@xcelenergy.com	Xcel Energy	414 Nicollet Mall, Fl. 6 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-201_M-14-201
Benjamin	Gerber	bgerber@mnychamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_14-201_M-14-201
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_14-201_M-14-201
Mark	Glaess		Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Paper Service	No	OFF_SL_14-201_M-14-201
Rachel	Gold	rachel.gold@opower.com	Opower	1515 N. Courthouse Rd 8th Fl Arlington, VA 22201	Electronic Service	No	OFF_SL_14-201_M-14-201
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Electronic Service	No	OFF_SL_14-201_M-14-201

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	OFF_SL_14-201_M-14-201
Lara V	Greden	N/A	The Weidt Group	5800 Baker Rd Minnetonka, MN 55345	Paper Service	No	OFF_SL_14-201_M-14-201
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	OFF_SL_14-201_M-14-201
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_14-201_M-14-201
Stephan	Gunn	sgunn@appliedenergygroup.com	Applied Energy Group	1941 Pike Ln De Pere, WI 54115	Electronic Service	No	OFF_SL_14-201_M-14-201
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-201_M-14-201
Jeffrey	Haase	jhaase@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_14-201_M-14-201
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_14-201_M-14-201
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_14-201_M-14-201
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	OFF_SL_14-201_M-14-201

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Norm	Harold	N/A	NKS Consulting	5591 E 180th St Prior Lake, MN 55372	Paper Service	No	OFF_SL_14-201_M-14-201
Jared	Hendricks	hendricksj@owatonnautilities.com	Owatonna Public Utilities	PO Box 800 208 S Walnut Ave Owatonna, MN 55060-2940	Electronic Service	No	OFF_SL_14-201_M-14-201
Jessy	Hennesy	jessy.hennesy@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_14-201_M-14-201
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_14-201_M-14-201
Holly	Hinman	holly.r.hinman@xcelenergy.com	Xcel Energy	414 Nicollet Mall, 6th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-201_M-14-201
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_14-201_M-14-201
Karolanne	Hoffman	kmh@dairynet.com	Dairyland Power Cooperative	PO Box 817 La Crosse, WI 54602-0817	Electronic Service	No	OFF_SL_14-201_M-14-201
Tom	Holt	tholt@eastriver.coop	East River Electric Power Coop., Inc.	PO Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_14-201_M-14-201
Michael	Hoy	mhoy@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_14-201_M-14-201
Anne	Hunt	anne.hunt@ci.stpaul.mn.us	City of Saint Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	OFF_SL_14-201_M-14-201

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jim	Jarvis	N/A	ReDirect Energy, LLC	44 7th Avenue NE Minneapolis, MN 55413	Paper Service	No	OFF_SL_14-201_M-14-201
Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	OFF_SL_14-201_M-14-201
Paula	Johnson	paulajohnson@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_14-201_M-14-201
Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S Virginia, MN 55792	Electronic Service	No	OFF_SL_14-201_M-14-201
Dave	Johnson	N/A	Community Action of Minneapolis	2104 Park Ave S Minneapolis, MN 55404	Paper Service	No	OFF_SL_14-201_M-14-201
Larry	Johnston	lw.johnston@smmpa.org	SMMPA	500 1st Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_14-201_M-14-201
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_14-201_M-14-201
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE Austin, MN 55912	Electronic Service	No	OFF_SL_14-201_M-14-201
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-201_M-14-201
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_14-201_M-14-201

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Martin	Lepak	N/A	Arrowhead Economic Opportunity	702 S 3rd Ave Virginia, MN 55792	Paper Service	No	OFF_SL_14-201_M-14-201
Allan	Lian	alian@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_14-201_M-14-201
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_14-201_M-14-201
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_14-201_M-14-201
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-201_M-14-201
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_14-201_M-14-201
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_14-201_M-14-201
Matt	McCaffree	bademailmatt.mccaffree@opower.com	Opower	1515 N. Courthouse Rd 8th Fl Arlington, VA 22201	Paper Service	No	OFF_SL_14-201_M-14-201
Scot	McClure		Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Paper Service	No	OFF_SL_14-201_M-14-201
Tom	McDougall	N/A	The Weidt Group	5800 Baker Rd Minnetonka, MN 55345	Paper Service	No	OFF_SL_14-201_M-14-201

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bridget	McLaughlin	bmclaughlin@mncee.org	Center for Energy & Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-201_M-14-201
John	McWilliams	jmm@dairynet.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_14-201_M-14-201
Brian	Meloy	brian.meloy@stinsonleonard.com	Stinson, Leonard, Street LLP	150 S 5th St Ste 2300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-201_M-14-201
Craig	Metz	N/A	EnSave Energy Performance	65 Millet St, Suite 105 Richmond, VT 05477	Paper Service	No	OFF_SL_14-201_M-14-201
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_14-201_M-14-201
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-201_M-14-201
Gary	Myers	garym@hpuc.com	Hibbing Public Utilities	1902 E 6th Ave Hibbing, MN 55746	Paper Service	No	OFF_SL_14-201_M-14-201
Susan K	Nathan	snathan@appliedenergygroup.com	Applied Energy Group	2215 NE 107th Ter Kansas City, MO 64155-8513	Electronic Service	No	OFF_SL_14-201_M-14-201
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_14-201_M-14-201
Paul	Ohlson	N/A	EnSave Energy Performance	65 Millet Street, Suite 105 Richmond, VT 05477	Paper Service	No	OFF_SL_14-201_M-14-201

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Gary	Olson		Product Recovery, Inc.	2605 E Cliff Rd Burnsville, MN 55337	Paper Service	No	OFF_SL_14-201_M-14-201
Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_14-201_M-14-201
Larry	Oswald		Honeywell, Inc.	1335 2nd Ave N Ste B Fargo, ND 58103	Paper Service	No	OFF_SL_14-201_M-14-201
Kim	Pederson	kpederson@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-201_M-14-201
Audrey	Peer	audrey.peer@centerpointenergy.com	CenterPoint Energy	800 Lasalle Avenue - 14th Floor Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_14-201_M-14-201
Lisa	Pickard	lpickard@minnkota.com	Minnkota Power Cooperative	1822 Mill Rd PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	OFF_SL_14-201_M-14-201
Bill	Poppert		Technology North	2433 Highwood Ave St. Paul, MN 55119	Paper Service	No	OFF_SL_14-201_M-14-201
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-201_M-14-201
Michael	Sachse	N/A	Opower	1515 N Courthouse Rd FL 8 Arlington, VA 22201	Paper Service	No	OFF_SL_14-201_M-14-201

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Bruce	Sayler	bruces@connexusenergy.com	Connexus Energy	14601 Ramsey Boulevard Ransey, MN 55303	Electronic Service	No	OFF_SL_14-201_M-14-201
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-201_M-14-201
Cindy	Schweitzer Rott	cindy.schweitzer@clearesult.com	CLEAResult's	S12637A Merrilee Rd. Spring Green, WI 53588	Electronic Service	No	OFF_SL_14-201_M-14-201
Tom	Smilanich		Passive Concepts	228 6th Ave N South St. Paul, MN 55075	Paper Service	No	OFF_SL_14-201_M-14-201
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_14-201_M-14-201
Grey	Staples	gstaples@mendotagroup.com	The Mendota Group LLC	1830 Fargo Lane Mendota Heights, MN 55118	Electronic Service	No	OFF_SL_14-201_M-14-201
Leo	Steidel	N/A	The Weidt Group	5800 Baker Rd Minnetonka, MN 55345	Paper Service	No	OFF_SL_14-201_M-14-201
Leo	Steidel	lsteidel@energyplatforms.com	Energy Platforms	8170 Old Carriage Court N Ste 200 Shakopee, MN 55379	Paper Service	No	OFF_SL_14-201_M-14-201
John	Steinhoff		Resource Solutions, Inc.	318 Kensington Drive Madison, WI 53704	Paper Service	No	OFF_SL_14-201_M-14-201

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Richard	Szydlowski	N/A	Center for Energy & Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401-1459	Paper Service	No	OFF_SL_14-201_M-14-201
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-201_M-14-201
Steve	Tomac	N/A	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Paper Service	No	OFF_SL_14-201_M-14-201
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_14-201_M-14-201
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_14-201_M-14-201
Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_14-201_M-14-201
Lisa	Wilson	lisa.wilson@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_14-201_M-14-201
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_14-201_M-14-201

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
George	Agriesti		Minnesota Power	30 W Superior St Duluth, MN 55802	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Julie Rae	Ambach	jambach@shakopeeutilities.com	Shakopee Public Utilities	255 Sarazin St Shakopee, MN 55379	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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		Interstate Power And Light Company	4902 N Biltmore Ln PO Box 77007 Madison, WI 537071007	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
John	McWilliams	jmm@dairynet.com	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@stinsonleonard.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	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Gary	Myers	garym@hpuc.com	Hibbing Public Utilities	1902 E 6th Ave Hibbing, MN 55746	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

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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
Gary	Olson		Product Recovery, Inc.	2605 E Cliff Rd Burnsville, MN 55337	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Kim	Pederson	kpederson@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Audrey	Peer	audrey.peer@centerpointenergy.com	CenterPoint Energy	800 Lasalle Avenue - 14th Floor Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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Bill	Poppert		Technology North	2433 Highwood Ave St. Paul, MN 55119	Paper 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
Tom	Smilanich		Passive Concepts	228 6th Ave N South St. Paul, MN 55075	Paper 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
John	Steinhoff		Resource Solutions, Inc.	318 Kensington Drive Madison, WI 53704	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Richard	Szydlowski	N/A	Center for Energy & Environment	212 3rd Ave N Ste 560 Minneapolis, MN 55401-1459	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
SaGonna	Thompson	Regulatory.Records@xcele nergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Steve	Tomac	N/A	Basin Electric Power Cooperative	1717 E Interstate Ave Bismarck, ND 58501	Paper Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Lisa	Wilson	lisa.wilson@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Robyn	Woeste	robynwoeste@alliantenerg y.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST