



Your Touchstone Energy® Partner 

April 24, 2020

Will Seuffert, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

**SUBJECT: Compliance Filing
In the Matter of the Application of Dakota Electric Association for
Authority to Increase Rates for Electric Service in Minnesota
MPUC Docket No. E-111/GR-19-478
OAH Docket No. 60-2500-36475**

Dear Mr. Seuffert:

On April 23, 2020, the Minnesota Public Utilities Commission (MPUC or Commission) issued a *NOTICE OF SCHEDULE FOR FILING EXCEPTIONS TO THE ALJ'S REPORT AND REQUEST FOR DAKOTA ELECTRIC ASSOCIATION TO FILE SCHEDULES REFLECTING THE ALJ'S RECOMMENDATION* (Notice) in Docket No. E-111/GR-19-478. This Notice establishes a comment period for filign exceptions to the Administrative Law Judge's Findings of Fact, Conclusions and Recommendation and requires Dakota Electric Assocaion (Dakota Electric or Cooperative) to file the following information:

Dakota Electric Association (Dakota Electric) is to file a pro forma rate base, income statement, and revenue requirement summary, a schedule of the class revenue allocations and all billing determinants, a detailed schedule supporting the calculation of the base cost of gas, and bridge schedules, that reflect the test year revenue requirement and rate design recommended by the ALJ, by Monday, April 27, 2020.

This compliance filing includes the information described above.

If you or your staff has any questions regarding this compliance filing, please call me at (651) 463-6258.

Sincerely,

/s/ Douglas R. Larson

Douglas R. Larson
Vice President of Regulatory Services
Dakota Electric Association
4300 220th St. W.
Farmington, MN 55024

Certificate of Service

I, Cherry Jordan, hereby certify that I have this day served copies of the attached document to those on the following service list by e-filing, personal service, or by causing to be placed in the U.S. mail at Farmington, Minnesota.

Docket Nos. E-111/GR-19-478

Dated this 24th day of April 2020

/s/ Cherry Jordan

Cherry Jordan

Income Adjustment Reconciliation - Present Rates

	<u>DEA Original Pro Forma Test Year</u>	<u>DOC Proposal</u> 1/	<u>DOC Position</u> 1/	<u>OAG Proposal</u> 2/	<u>Adjusted Pro Forma Test Year</u>
Revenue Adjustments					
Rate Schedules	200,480,307	148,612	200,628,919		
Other	<u>1,100,791</u>		<u>1,100,791</u>		
Total Operating Revenue	201,581,098	148,612	201,729,710		201,729,710
Expense Adjustments					
Power Costs	150,649,466	100,178	150,749,644		150,749,644
NRECA Dues (13%)		(10,475)			
MREA Lobbying		(24,367)			
Employee Travel				(3,549)	
Community Events				<u>(7,965)</u>	
Other Expenses	<u>49,120,160</u>	<u>(34,842)</u>	<u>49,085,318</u>	<u>(11,514)</u>	49,073,804
Subtotal Expense Adjustment	199,769,626	65,336	199,834,962	(11,514)	199,823,448
Net Operating Income	1,811,472	83,276	1,894,748	11,514	1,906,262

1/ Ex. DOC - ____, MAJ-S-6

2/ Lee Surrebuttal Testimony

Rate of Return Adjustment Reconciliation - Present Rates

	DEA Original Pro Forma Test Year	DOC Adjustments	1/	DOC Surrebuttal Position	OAG Adjustments	1/	Updated Net Position
Average Rate Base	189,064,856	(2,622)		189,062,234	(1,162)		189,061,072
Rate of Return	5.73%	-0.05%		5.68%			5.68%
Required Operating Income	10,831,846			10,742,260			10,742,194
Less: Non Operating Income	292,978	(8,227)		284,751			284,751
Net Operating Income Required	10,538,868			10,457,509			10,457,443
Operating Income	1,811,472	83,276		1,894,748	11,514		1,906,262
Income Deficiency	8,727,396	(164,635)		8,562,761	(11,580)		8,551,181

1/ Adjustment to cash working capital based on reduction of allowable expenses

UPDATED

Statement of Operations
Present Rates
Test Year - 2018 Historical Adjusted

(a) Line No.	(b) Description	(c) 2018 Actual	(d) Adjustments ¹	(e) Pro Forma Test Year
1	<u>Operating Revenue</u>	(\$)	(\$)	(\$)
2	Rate Schedules	202,630,477	(2,001,558)	200,628,919 ²
3	Other	508,198	592,593	1,100,791
4	Total Operating Revenue	203,138,675	(1,408,965)	201,729,710
5	<u>Operating Expenses</u>			
6	Cost of Purchased Power	149,330,034	1,419,610	150,749,644 ³
7	Transmission - O & M	-		-
8	Distribution - Operation	7,277,184	(383,045)	6,894,139
9	Distribution - Maintenance	6,151,338	242,574	6,393,912
10	Consumer Accounts	5,312,955	380,854	5,693,809
11	Consumer Service & Information	3,585,760	(180,461)	3,405,299
12	Sales	-		-
13	Administrative & General	11,907,838	25,427	11,933,265
14	Depreciation & Amortization	10,281,975	404,073	10,686,048
15	Taxes - Property	3,372,283	178,507	3,550,790
16	Taxes - Other	-		-
17	Other Interest Expense	549,008		549,008
18	Other Deductions	6,239	(38,705)	(32,466)
19	Total Operating Expenses (Before Long Term Interest)	197,774,614	2,048,834	199,823,448
20	Net Operating Income (Before Long Term Interest)	5,364,061	(3,457,799)	1,906,262

¹ The operating expense adjustments are summarized on pages 2 through 10.

² See pages 12 through 21 for Pro Forma Test Year Revenue.

³ See page 22 for Pro Forma Test Year Purchased Power expense.

UPDATED

Summary of Test Year Adjustments to Operating Expenses

(a) Line No.	(b) Description	(c) 2018 Actual	(d) Adjustments	(e) Pro Forma Test Year	Change from 2018 Actual
<u>Operating Expenses</u>					
1	Distribution - Operation (DO)	\$ 7,277,184	\$ (383,045)	\$ 6,894,139	-5.3%
2	Distribution - Maintenance (DM)	6,151,338	242,574	6,393,912	3.9%
3	Consumer Accounts (CA)	5,312,955	380,854	5,693,809	7.2%
4	Consumer Service & Information (CS)	3,585,760	(180,461)	3,405,299	-5.0%
5	Sales		-	-	
6	Administrative & General (AG)	11,907,838	25,427	11,933,265	0.2%
7	Depreciation & Amortization	10,281,975	404,073	10,686,048	3.9%
8	Taxes - Property	3,372,283	178,507	3,550,790	5.3%
9	Taxes - Other	-	-	-	
10	Other Interest Expense	549,008	-	549,008	0.0%
11	Other Deductions	6,239	(38,705)	(32,466)	-620.4%
12	Total Operating Expenses Excluding Purchased Power (Before Long Term Interest)	\$ 48,444,580	\$ 629,224	\$ 49,073,804	1.3%

Check Total

Summary of Test Year Adjustments to Operating Expenses

Reference

Payroll

General Payroll Increase	\$ 420,048	Page 3 of 22
Capital to Expense Changes	(65,168)	Page 4 of 22
Staffing Changes	260,379	Page 5 of 22
Total Payroll Adjustments	615,259	

Payroll Benefits

Benefits on General Payroll Increase	197,171	Page 7 of 22
Benefits on Capital to Expense Changes	(30,590)	Page 7 of 22
Benefits on Staffing Changes	122,222	Page 7 of 22
Base Benefit Decrease	(393,317)	Page 6 of 22
Total Payroll Benefits	(104,514)	

Depreciation

Depreciation	404,073	Page 8 of 22
Other Adjustments	(118,505)	Page 10 of 22
Property Taxes	178,507	Page 8 of 22
Reduction in CIP Spending 2019 Budget to 2018 Actual	(200,296)	Page 9 of 22
Regulatory Filing Fees	18,800	Page 9 of 22
Rate Filing Fees recovery over 5 years	82,000	Page 10 of 22

DOC Disallowed Dues Expense	(34,842)
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OAG Disallowed Travel and Community Events Expense	(11,514)
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Net Deduction for Disallowed Expenses	(199,744)	Page 10 of 22
Total Test Year Adjustments	\$ 629,224	

**Summary of Consumers, Energy Sales, and
Revenue Under Present Rates**

(Continued)

II. Consumer and Sales Data for Pro Forma Test Year

(a)	(b)	(c)	(d)	(e)	(f)
Line No.	Description	2019 Budget Avg No. Cons. ¹	Energy Sales ² (kWh)	Billing Demand ² (kW)	Revenue ³ (\$)
1	Residential & Farm Service (31)	100,202	839,291,952	N.A.	114,480,647
2	Residential & Farm Demand Control (32)	15	378,000	917.2	42,670
3	Electric Vehicle (33)	88	300,960	N.A.	24,636
4	Irrigation Service (36) Firm	8	162,528	1,867.3	50,143
5	Irrigation Service (36) Interruptible	384	7,801,344	74,387.5	862,089
6	Small General Service (41)	4,431	42,537,600	N.A.	5,799,609
7	Security Lighting Service (44) - Closed to New	878	405,600	N.A.	102,369
8	Street Lighting Service (44-2)	2,269	2,405,280	N.A.	466,293
9	Street Lighting System (44-1)	470	521,040	N.A.	72,603
10	Custom Residential Street Lighting (44-3)	12,190	6,750,960	N.A.	1,334,683
11	LED Security Lighting Service (44 -4)	356	64,896	N.A.	31,109
12	LED Street Lighting Member Owned(44-5)	11	8,712	N.A.	1,297
13	LED Street Lighting (44-6)	597	202,152	N.A.	59,884
14	Low Wattage Unmetered Service (45)	71	-	N.A.	8,520
15	General Service (46)	2,750	462,000,000	1,442,500.4	50,261,766
16	Municipal Civil Defense Sirens (47)	66	-	N.A.	3,960
17	Geothermal Heat Pump (49) Closed to New	3	172,800	N.A.	16,571
18	Controlled Energy Storage (51)	1,718	10,308,000	N.A.	459,736
19	Controlled Interruptible Service (52)	6,686	44,127,600	N.A.	2,634,418
20	Residential & Farm Time of Day (53)	18	216,216	N.A.	29,057
21	General Service Time of Day (54)	6	1,059,984	6,802.3	126,286
22	Standby Service (60)	1	-	-	66,840
23	Full Interruptible Service (70)	234	379,080,000	858,880.1	23,144,467
24	Partial Interruptible Service (71)	28	27,720,000	111,609.5	2,151,089
25	Cycled Air Conditioning Service (80)	41,880	5,075,000	N.A.	(1,625,193)
26	Wellspring				23,370
27	Total ⁴	108,165	1,825,515,624	2,496,964.3	200,628,919
28	Actual Revenue Recorded 2018				202,630,477
29	Adjustment				(2,001,558)

¹ Pro Forma Test Year consumers are based on DEA's average number of 2019 budgeted consumers.

² Energy Sales are based on average monthly sales using the higher of 7-10 year trend or budget multiplied by average budgeted 2019 number of customers. See Workpaper 13.

³ See page 13 through 21.

⁴ The total number of consumers excludes Security, Street & Residential Lighting, Low Wattage Unmetered Service, Municipal Civil Defense Sirens, Controlled Off-Peak Energy Storage, Interruptible Heating, and Controlled Air Conditioning Service.

**Summary of Consumers, Energy Sales, and
Revenue Under Present Rates**
(Continued)

III. Estimate of Revenue Under Present Rates

Rate Class	Billing Determinants	Units	Rate	Revenue
<u>Residential & Farm Service (31)</u>				(\$)
Fixed Charge	100,202	cons.	\$9.00	10,821,816
Energy Charge	839,291,952	kWh		
Summer	257,394,071	kWh	\$0.13080	33,667,144
Other	581,897,881	kWh	\$0.11680	67,965,673
			Subtotal	112,454,633
RTA Charge ¹	839,291,952	kWh	\$0.00250	2,098,230
Controlled Water Heater Credit	1,003	units	(\$6.00)	(72,216)
			Total	<u>114,480,647</u>
<u>Residential & Farm Demand Control (32)</u>				
Fixed Charge	15	cons.	\$12.00	2,160
Demand Charge	917.2	kW		
Summer	182.2	kW	\$14.70	2,678
Other	735.0	kW	\$11.10	8,159
Energy Charge	378,000	kWh	\$0.07600	28,728
			Subtotal	41,725
RTA Charge ¹	378,000	kWh	\$0.00250	945
			Total	<u>42,670</u>
<u>Electric Vehicle (33)</u>				
Energy Charge				
Off Peak	280,402	kWh	\$0.06740	18,899
On Peak	8,554	kWh	\$0.41440	3,545
Other				
Summer	2,693	kWh	\$0.13080	352
Other	9,311	kWh	\$0.11680	1,088
			Subtotal	23,884
RTA Charge ¹	300,960	kWh	\$0.00250	752

24,636

¹ 2019 applied RTA.

UPDATED

**Summary of Consumers, Energy Sales, and
Revenue Under Present Rates
(Continued)**

III. Estimate of Revenue Under Present Rates

Rate Class	Billing Determinants	Units	Rate	Revenue (\$)
<u>Controlled Air Conditioning Service (80)</u>				
Option 1		kWh	\$0.00	0
Option 2				
Residential Rate 81/31	4,750,463	kWh	(\$0.03200)	(152,015)
Rate 81/41	324,537	kWh	(\$0.03200)	(10,385)
Rate 81/46	0	kWh	(\$0.03200)	0
	5,075,000	kWh		(162,400)
Option 3				
Residential Rate 82/31	35,158	cons.	(\$13.00)	(1,371,162)
Commercial	0	cons.	(\$13.00)	0
	35,158			(1,371,162)
Option 4				
Rate 84/41	4,699	tons	(\$6.50)	(91,631)
Rate 84/46	0	tons	(\$6.50)	0
	4,699			(91,631)
			Total	(1,625,193)

Wellspring

23,370

Grand Total	1,825,515,624 kWh	\$ 200,628,919
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UPDATED**Estimate of Pro Forma
Test Year Purchased Power Expense**

(a) Line No.	(b) Description	(c) Units	(d) Rate	(e) Cost (\$)
	Based on GRE Year 2019 Rates ¹			
1	GRE General Purchases			
2	Capacity Charge ²			
3	Summer - Gross	1,170,182.0 kW		
4	Less Demand Credits	(188,977.0) kW		
5	Summer - Net	981,205.0 kW	\$ 18.24 /kW	17,897,179
6				
7	Winter	841,667.0 kW		
8	Less Demand Credits	(151,242.0) kW		
9	Winter - Net	690,425.0 kW	\$ 12.16 /kW	8,395,568
10				
11	Other	1,636,822.0 kW		
12	Less Demand Credits	(318,324.0) kW		
13	Other - Net	1,318,498.0 kW	\$ 6.08 /kW	8,016,468
14	Total Demand - Net	2,990,128.0 kW		34,309,215
15				
16	Energy Charge			
17	Wholesale Solar	4,500,000 kWh	\$ 0.060494 /kWh	272,224
18	On Peak	620,986,580 kWh	\$ 0.059390 /kWh	36,880,393
19	Off Peak	1,248,965,342 kWh	\$ 0.046460 /kWh	58,026,930
20	Ancillary Charge	1,874,451,922 kWh	\$ 0.000090 /kWh	168,701
21				
22	Transmission Charge	3,121,836.6 kW	\$ 6.57 /kW	20,510,466
23	Ancillary Charge	3,121,836.6 kW	\$ 0.69 /kW	2,154,067
24				
25	ETS-Space Heating Off Peak	1,323,100 kWh	\$ (0.023960) /kWh	(31,701)
26	ETS-Interruptible Water Heating Off Peak	6,187,000 kWh	\$ (0.026460) /kWh	(163,708)
27	ETS-Electric Vehicle Off Peak	264,300 kWh	\$ (0.026460) /kWh	(6,993)
28	Peak Shave Water Heating (8 hr) Off Peak	14,844,800 kWh	\$ (0.012460) /kWh	(184,966)
29	Peak Shave Water Heating (8 hr) On Peak	6,362,100 kWh	\$ (0.025390) /kWh	(161,534)
30	Dual Fuel Off Peak	12,961,800 kWh	\$ (0.009960) /kWh	(129,100)
31	Dual Fuel On Peak	5,555,100 kWh	\$ (0.022890) /kWh	(127,156)
32	Air Conditioner Credit (3 Mo.)		\$5.00 /unit/mo.	(772,584)
33				
34	Standby Reservation Fee	1 cons.	\$27,060.00 /year	27,060
35	Wellspring			23,370
36	MSR Credit			(45,040)
37	Total Test Year Purchased Power Cost			150,749,644
38	Actual Purchased Power Recorded 2018			149,330,034
39	Adjustment			1,419,610

¹ Test Year Rates are GRE's Year 2019 updated rates. Includes a direct pass through of Wellspring costs.

² The Test Year capacity is based on 2019 budget

³ Wholesale Solar purchases are 2019 budget.

**Determination of Revenue
Requirements - Summary**

(a) Line No.	(b) Description	(c) 2018 Actual (\$)	(d) Present Rates Pro Forma Test Year (\$)	(e) Proposed Rates Pro Forma Test Year (\$)
Financial Results From Rates				
1	Total Revenue ¹	203,138,675	201,729,710	210,275,382
2	Operating Expense ¹	197,774,614	199,823,448	199,823,448
3	Net Operating Income (before interest expense) ²	5,364,061	1,906,262	10,451,934
4	Capital Credits ³	5,111,212	5,111,212	5,111,212
5	Other Non-Operating Income ³	292,978	284,751	284,751
6	Total Margin (before interest expense) ⁴	10,768,251	7,302,225	15,847,897
Required Increase (Decrease) --ROR Objective				
7	Operating Expense (excluding interest) ¹	197,774,614	199,823,448	199,823,448
8	Margin Requirements			
9	Rate Base ⁵	189,061,072	189,061,072	189,061,072
10	Rate of Return ⁶	5.68%	5.68%	5.68%
11	Required Return ⁷	10,740,044	10,742,194	10,742,194
12	Less: Non-Operating Income ³	292,978	284,751	284,751
13	Net Operating Income Required ⁸	10,447,066	10,457,443	10,457,443
14	Total Revenue Requirements ⁹	208,221,680	210,280,891	210,280,891
15	Revenue Present Rates			
16	Tariff Revenue ¹	202,630,477	200,628,919	209,140,594
17	Other Operating Revenue ¹	508,198	1,100,791	1,134,788
18	Total Revenue ¹⁰	203,138,675	201,729,710	210,275,382
19	Required Increase (Decrease) ¹¹	5,083,005	8,551,181	5,509
20	Percent Increase (Decrease) ¹²	2.51	4.26	0.00

¹ See Exhibit__(DEA-1).

² Line 1 minus Line 2.

³ See Workpaper 1.

⁴ Line 3 plus Line 4 plus Line 5.

⁵ See Exhibit__(DEA-2), page 2.

⁶ See Exhibit__(DEA-2), page 8.

⁷ Line 9 times Line 10.

⁸ Line 11 minus Line 12.

⁹ Line 7 plus Line 13.

¹⁰ Line 16 plus Line 17.

¹¹ Line 14 minus Line 18.

¹² Line 19 divided by Line 16.

**Determination of Revenue
Requirements - Summary**

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	
Line No.	Description	2018 Actual	Present Rates Pro Forma Test Year	Settlement Agreement Adjustments DOC	OAG	Updated Present Rates Pro Forma Test Year	Original Proposed Rates Pro Forma Test Year	Combined Settlement Agreement Adjustments	Updated Proposed Rates Pro Forma Test Year	
Financial Results From Rates		(\$)	(\$)				(\$)		(\$)	
1	Total Revenue ¹	203,138,675	201,581,098	148,612		201,729,710	210,263,272		210,275,382	
2	Operating Expense ¹	197,774,614	199,769,626	65,336	(11,514)	199,823,448	199,769,626	53,822	199,823,448	
3	Net Operating Income (before interest expense) ²	5,364,061	1,811,472	83,276	11,514	1,906,262	10,493,646		10,451,934	
4	Capital Credits ³	5,111,212	5,111,212			5,111,212	5,111,212		5,111,212	
5	Other Non-Operating Income ³	292,978	292,978	(8,227)		284,751	292,978	(8,227)	284,751	
6	Total Margin (before interest expense) ⁴	10,768,251	7,215,662	75,049		7,302,225	15,897,836		15,847,897	
Required Increase (Decrease) --ROR Objective										
7	Operating Expense (excluding interest) ¹	197,774,614	199,769,626	65,336	(11,514)	199,823,448	199,769,626	53,822	199,823,448	
8	Margin Requirements									
9	Rate Base ⁵	189,064,856	189,064,856	(2,622)	(1,162)	189,061,072	189,064,856	(3,784)	189,061,072	
10	Rate of Return ⁶	5.73%	5.73%			5.68%	5.73%		5.68%	
11	Required Return ⁷	10,831,846	10,831,846			10,742,194	10,831,846		10,742,194	
12	Less: Non-Operating Income ³	292,978	292,978	(8,227)		284,751	292,978	(8,227)	284,751	
13	Net Operating Income Required ⁸	10,538,868	10,538,868			10,457,443	10,538,868		10,457,443	
14	Total Revenue Requirements ⁹	208,313,482	210,308,494			210,280,891	210,308,494		210,280,891	
15	Revenue Present Rates									
16	Tariff Revenue ¹	202,630,477	200,480,307	148,612		200,628,919	209,128,484		209,140,594	
17	Other Operating Revenue ¹	508,198	1,100,791			1,100,791	1,134,788		1,134,788	
18	Total Revenue ¹⁰	203,138,675	201,581,098			201,729,710	210,263,272		210,275,382	
19	Required Increase (Decrease) ¹¹	5,174,807	8,727,396			8,551,181	45,222		5,509	
20	Percent Increase (Decrease) ¹²	2.55	4.35			4.26	0.02		0.00	
21	Recommended Total Tariff Revenue					209,180,100				
22	Total Increase					8,551,181				

¹ See Exhibit__(DEA-1).

² Line 1 minus Line 2.

³ See Workpaper 1.

⁴ Line 3 plus Line 4 plus Line 5.

⁵ See Exhibit__(DEA-2), page 2.

⁶ See Exhibit__(DEA-2), page 8.

⁷ Line 9 times Line 10.

⁸ Line 11 minus Line 12.

⁹ Line 7 plus Line 13.

¹⁰ Line 16 plus Line 17.

¹¹ Line 14 minus Line 18.

¹² Line 19 divided by Line 16.

Rate Base

(a)	(b)	(c)
Line No.	Description	Proposed Pro Forma Test Year
		(\$)
1	Utility Plant in Service ¹	300,342,133
2	Construction Work in Progress ¹	4,222,209
3	Less: Accumulated Provision for Deprec. ²	126,526,023
4	Net Plant ¹	178,038,319
5	Materials & Supplies - Electric ³	4,715,491
6	Working Capital ⁴	6,812,363
7	Subtotal	11,527,854
8	Less: Consumer Deposits ¹	505,101
9	Total Rate Base	189,061,072

¹ December 31, 2018 Form 7 amount. See Workpaper 1.

² December 31, 2018 Form 7 amount adjusted to include Depreciation adjustment .
See Exhibit _ (DEA-1), page 8.

³ Thirteen - month average. See Exhibit __ (DEA-2), page 3.

⁴ See Exhibit 9. Updated for DOC and OAG adjustments.

Asset Growth Rate
Department of Commerce Methodology
(Natural Logarithm of a Number)

(a) <i>LN of Assets</i>	(b) <i>Year</i>	(c) <i>Time</i>	(d) <i>Assets</i> ¹	(e) From LRF
19.6450	2018	1	340,193,777	340,193,777
19.6618	2019	2	345,961,418	345,961,418
19.6816	2020	3	352,873,712	352,873,712
19.6974	2021	4	358,477,813	358,477,813
19.7135	2022	5	364,321,717	364,321,717
19.7318	2023	6	371,018,880	371,018,880
19.7445	2024	7	375,785,642	375,785,642
19.7583	2025	8	380,994,230	380,994,230
19.7713	2026	9	385,996,186	385,996,186
19.7851	2027	10	391,362,529	391,362,529
19.8009	2028	11	397,573,959	397,573,959

0.0154 (10 yr. exponential GR)

0.0173 (5 yr. exponential GR)

¹ Assets represent forecasted Assets for the years listed.
See Workpaper 5, Page 2.

(f) <i>LN of Assets</i>	(g) <i>Year</i>	(h) <i>Time</i>	(i) <i>Forecasted Assets</i> ²	(j) <i>LN of Act Assets</i>	(e) <i>Actual Assets</i> ³
19.4784	2013	1	287,990,179	19.4784	287,990,179
19.5124	2014	2	297,949,038	19.5158	298,958,097
19.5390	2015	3	305,981,551	19.5245	301,558,832
19.5599	2016	4	312,447,547	19.5645	313,867,753
19.5836	2017	5	319,938,321	19.6097	328,388,386
19.6030	2018	6	326,183,309	19.6450	340,193,777
19.6207	2019	7	332,020,372		
19.6382	2020	8	337,892,083		
19.6557	2021	9	343,853,341		
19.6731	2022	10	349,876,440		
19.6904	2023	11	355,974,823		

0.0204 (10 yr. exponential GR)

0.0245 (5 yr. exponential GR)

0.0330 (5 yr. exponential GR)

Difference in Actual & Forecasted Asset Growth Rates 2013 to 2018	0.0085
Divided by 3	3
DOC Adjustment	0.0028

² Assets represent forecasted Assets for the years listed.
See Workpaper 5, Page 2 (2014 Rate Case)

³ Actual assets for the years listed from Form 7. See Workpaper 2.

**Overall Return on Rate Base
Department of Commerce Methodology**

Assumptions:

1	Asset Growth Rate	2.01%
2	Test Year Equity Ratio - 2018	63.43%
3	Test Year Debt Ratio - 2018	36.57%
4	Test Year Total Capital	\$ 272,999,564
5	Test Year Total Equity	\$ 173,151,167
6	Test Year Total Debt	\$ 99,848,397
7	Annual Capital Credits	\$ 3,500,000
8	Rate Base	\$ 189,061,072
9	Cost of Long-Term Debt	3.77%

Terms:

CC	Capital Credits
DR	Debt Ratio = (Debt/Total Capital)
ER	Equity Ratio = (Equity/Total Capital)
g	Growth in Equity
i	Cost of Long-Term Debt
K	Rate of Return on Equity
OCC	Overall Cost of Capital
RB	Rate Base
ROR	Return on Rate Base
TC	Total Capital
TIER	Times Interest Earned Ratio

DOC Method:

Return on Equity: $K=g+(CC/(ER \times TC))$	g	ER	TC	CC
	0.0201	0.6343	272,999,564	\$ 3,500,000
Return on Equity:	0.0403	$K = g + (CC/(ER \times TC))$		
Overall Cost of Capital (OCC):	0.0393	$OCC = (ER \times K) + ((1 - ER) \times i)$		
Overall Return on Rate Base:	0.0568	ROR = OCC x (TC/RB)		
Times Interest Earned Ratio:	2.85	$TIER = ((K \times ER) + (i \times DR)) / (i \times DR)$		

¹ 5 Year Asset Growth Rate plus DOC Adjustment, See Exhibit__(DEA-2), Page 6 UPDATED.
(.0173+.0028=.0201)

² Equity/Total Capital

³ 1 - (Equity/Total Capital)

⁴ See DEA Exhibit_(DEA-2), Page 5

⁵ See DEA Exhibit_(DEA-2), Page 5

⁶ See DEA Exhibit_(DEA-2), Page 5

⁷ Long Range Financial Forecast

⁸ See DEA Exhibit_(DEA-2), Page 2 UPDATED.

⁹ See DEA Exhibit_(DEA-2), Page 4

Statement of Operations
Proposed Rates
Test Year - 2018 Historical Adjusted

(a) Line No.	(b) Description	(c) 2018 Actual	(d) Adjustments ¹	(e) Pro Forma Test Year
1	Operating Revenue	(\$)	(\$)	(\$)
2	Rate Schedules	202,630,477	6,510,117	209,140,594 ²
3	Other	508,198	626,590	1,134,788
4	Total Operating Revenue	203,138,675	7,136,707	210,275,382
5	Operating Expenses			
6	Cost of Purchased Power	149,330,034	1,419,610	150,749,644
7	Transmission - O & M	-		-
8	Distribution - Operation	7,277,184	(383,045)	6,894,139
9	Distribution - Maintenance	6,151,338	242,574	6,393,912
10	Consumer Accounts	5,312,955	380,854	5,693,809
11	Consumer Service & Information	3,585,760	(180,461)	3,405,299
12	Sales	-		-
13	Administrative & General	11,907,838	25,427	11,933,265
14	Depreciation & Amortization	10,281,975	404,073	10,686,048
15	Taxes - Property	3,372,283	178,507	3,550,790
16	Taxes - Other	-		-
17	Other Interest Expense	549,008		549,008
18	Other Deductions	6,239	(38,705)	(32,466)
	Total Operating Expenses (Before Long			
19	Term Interest)	197,774,614	2,048,834	199,823,448
	Net Operating Income (Before Long Term			
20	Interest)	5,364,061	5,087,873	10,451,934

¹ The operating expense adjustments are summarized on page 2 of Exhibit__(DEA-1).

² See pages 2 through 10 for an estimate of the Pro Forma Test Year revenue under proposed rates.

Statement of Operations
Proposed Rates
Test Year - 2018 Historical Adjusted

(a) Line No.	(b) Description	(c) 2018 Actual	(d) Original Adjustments ¹	(e) Pro Forma Test Year	(h) DOC			(i) ROR Adjustments ⁴	(j) DOC Updated Pro Forma Test Year	(k) OAG Adjustments ⁵	(l) Initial Proposed Deficiency	(m) Current Proposed Deficiency	(n) Calculated Pro Forma Test Year	Updated Pro Forma Test Year
					Other Inc. Adjustments ²	Expense Adjustments ³								
1	Operating Revenue	(S)												(S)
2	Rate Schedules	202,630,477	6,498,007	209,128,484	8,227	65,336	(89,652)	209,112,395	(11,514)	45,222	(5,509)	209,140,594	209,140,594	
3	Current Deficiency										5,509			-
4	Total Tariff Revenue Allowed												209,140,594	
5	Other	508,198	626,590	1,134,788				1,134,788					1,134,788	1,134,788
6	Total Operating Revenue	203,138,675	7,124,597	210,263,272	8,227	65,336	(89,652)	210,247,183	(11,514)	45,222		210,275,382	210,275,382	
7	Operating Expenses													
8	Cost of Purchased Power	149,330,034	1,319,432	150,649,466		100,178		150,749,644				150,749,644	150,749,644	
9	Transmission - O & M	-	-	-				-				-	-	
10	Distribution - Operation	7,277,184	(383,045)	6,894,139				6,894,139				6,894,139	6,894,139	
11	Distribution - Maintenance	6,151,338	242,574	6,393,912				6,393,912				6,393,912	6,393,912	
12	Consumer Accounts	5,312,955	380,854	5,693,809				5,693,809				5,693,809	5,693,809	
13	Consumer Service & Information	3,585,760	(180,461)	3,405,299				3,405,299				3,405,299	3,405,299	
14	Sales	-	-	-				-				-	-	
15	Administrative & General	11,907,838	71,783	11,979,621		(34,842)		11,944,779	(11,514)			11,933,265	11,933,265	
16	Depreciation & Amortization	10,281,975	404,073	10,686,048				10,686,048				10,686,048	10,686,048	
17	Taxes - Property	3,372,283	178,507	3,550,790				3,550,790				3,550,790	3,550,790	
18	Taxes - Other	-	-	-				-				-	-	
19	Other Interest Expense	549,008	-	549,008				549,008				549,008	549,008	
20	Other Deductions	6,239	(38,705)	(32,466)				(32,466)				(32,466)	(32,466)	
	Total Operating Expenses (Before Long Term Interest)	197,774,614	1,995,012	199,769,626	-	65,336	-	199,834,962	(11,514)	-	-	199,823,448	199,823,448	
21	Net Operating Income (Before Long Term Interest)	5,364,061	5,129,585	10,493,646	8,227	-	(89,652)	10,412,221	-	45,222	(5,509)	10,451,934	10,451,934	
22	Interest)													

¹ The operating expense adjustments are summarized on page 2 of Exhibit __ (DEA-1).

² Adjustment to Other Income per Johnson Surrebuttal Testimony.

³ Adjustment to Expense per Johnson Surrebuttal Testimony

⁴ Adjustment to Rate of Return Expense per Johnson Surrebuttal Testimony

⁵ Adjustment to Expense per Lee Surrebuttal Testimony

**Summary of Consumers, Energy Sales, and
Revenue Under Proposed Rates**

(Continued)

I. Consumer and Sales Data for Pro Forma Test Year

(a)	(b)	(c)	(d)	(e)	(f)
Line No.	Description	Avg. No. Cons.	Energy Sales ¹ (kWh)	Billing Demand (kW)	Revenue ² (\$)
1	Residential & Farm Service (31)	100,202	839,291,952	N.A.	119,434,146
2	Residential & Farm Demand Control (32)	15	378,000	917	44,491
3	Electric Vehicle (33)	88	300,960	N.A.	26,475
4	Irrigation Service (36) Firm	8	162,528	1,867	50,448
5	Irrigation Service (36) Interruptible	384	7,801,344	74,388	878,380
6	Small General Service (41)	4,431	42,537,600	N.A.	6,193,082
7	Security Lighting Service (44) - Closed to New	878	405,600	N.A.	120,426
8	Street Lighting Service (44-2)	2,269	2,405,280	N.A.	523,962
9	Street Lighting System (44-1)	470	521,040	N.A.	88,025
10	Custom Residential Street Lighting (44-3)	12,190	6,750,960	N.A.	1,621,490
11	LED Security Lighting Service (44 -4)	356	64,896	N.A.	31,393
12	LED Street Lighting Member Owned(44-5)	11	8,712	N.A.	1,472
13	LED Street Lighting (44-6)	597	202,152	N.A.	57,687
14	Low Wattage Unmetered Service (45)	71	-	N.A.	8,946
15	General Service (46)	2,750	462,000,000	1,442,500	51,164,153
16	Municipal Civil Defense Sirens (47)	66	-	N.A.	3,960
17	Geothermal Heat Pump (49) Closed to New	3	172,800	N.A.	17,798
18	Controlled Energy Storage (51)	1,718	10,308,000	N.A.	502,001
19	Controlled Interruptible Service (52)	6,686	44,127,600	N.A.	2,784,452
20	Residential & Farm Time of Day (53)	18	216,216	N.A.	30,323
21	General Service Time of Day (54)	6	1,059,984	6,802	130,759
22	Standby Service (60)	1	-	-	74,160
23	Full Interruptible Service (70)	234	379,080,000	858,880	24,654,929
24	Partial Interruptible Service (71)	28	27,720,000	111,610	2,299,459
25	Cycled Air Conditioning Service (80)	41,880	5,075,000	N.A.	(1,625,193)
26	Wellspring	-	-	-	23,370
27	Total ³	108,168	1,825,515,624	2,496,964.3	209,140,594

¹ See Exhibit__(DEA-1), page 12 UPDATED.

² See Exhibit__(DEA-5), pages 3 through 10 UPDATED.

³ The total number of consumers excludes Security, Street & Residential Lighting, Low Wattage Unmetered Service , Municipal Civil Defense Sirens, Controlled Off-Peak Energy Storage, Interruptible Heating, and Controlled Air Conditioning Service.

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**Summary of Consumers, Energy Sales, and
Revenue Under Proposed Rates**
(Continued)

II. Estimate of Revenue Under Proposed Rates

Rate Class	Billing		Rate	Revenue
Rate Class	Determinants	Units	Rate	Revenue
<u>Residential & Farm Service (31)</u>				(\$)
Fixed Charge	100,202	cons.	\$10.00	12,024,240
Energy Charge				
Summer	257,394,071	kWh	\$0.13770	35,443,164
Other	581,897,881	kWh	\$0.12380	72,038,958
	839,291,952	kWh	Subtotal	119,506,362
RTA Charge ¹	839,291,952	kWh		
Controlled Water Heater Credit	1,003	units	(\$6.00)	(72,216)
			Total	<u>119,434,146</u>
<u>Residential & Farm Demand Control (32)</u>				
Fixed Charge	15	cons.	\$13.00	2,340
Demand Charge				
Summer	182.2	kW	\$15.50	2,824
Other	735.0	kW	\$11.90	8,747
Energy Charge	378,000	kWh	\$0.08090	30,580
			Subtotal	44,491
RTA Charge ¹	378,000	kWh		
			Total	<u>44,491</u>
<u>Electric Vehicle (33)</u>				
Energy Charge				
Off Peak	280,402	kWh	\$0.07550	21,170
On Peak	8,554	kWh	\$0.44200	3,781
Other				
Summer	2,693	kWh	\$0.13770	371
Other	9,311	kWh	\$0.12380	1,153
			Subtotal	26,475
RTA Charge ¹	300,960	kWh		
				<u>26,475</u>
<u>Irrigation Service (36)</u>				
Firm Service				
Fixed Charge	8	cons.	\$33.00	3,168
Demand Charge				
Summer	902.3	kW	\$26.40	23,821
Winter	2.5	kW	\$21.00	53
Other	962.5	kW	\$15.52	14,938
Energy Charge	162,528	kWh	\$0.05210	8,468
RTA Charge ¹	162,528	kWh		
			Total	<u>50,448</u>

¹ Proposed rates assume zero RTA.

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**Summary of Consumers, Energy Sales, and
Revenue Under Proposed Rates
(Continued)**

II. Estimate of Revenue Under Proposed Rates

Rate Class	Billing Determinants	Units	Rate	Revenue (\$)
<u>Irrigation Service (36)</u>				
Interruptible Service				
Fixed Charge		384 cons.	\$33.00	152,064
Demand Charge		74,388 kW	\$4.30	319,866
Energy Charge		7,801,344 kWh	\$0.05210	406,450
RTA Charge ¹		7,801,344 kWh		
			Total	<u>878,380</u>
<u>Small General Service (41)</u>				
Fixed Charge				
Energy Charge		4,431 cons.	\$15.00	797,580
Summer		10,541,910 kWh	\$0.13740	1,448,458
Other		31,995,690 kWh	\$0.12340	3,948,268
		42,537,600 kWh	Subtotal	<u>6,194,306</u>
RTA Charge ¹		42,537,600 kWh		
Controlled Water Heater Credit		17 units	(\$6.00)	(\$1,224)
			Total	<u>6,193,082</u>
<u>Security Lighting Service (44) - Closed to New</u>				
175 W MV		lights	N/A	
100 W HPS		819 lights	\$12.00	117,936
150 W HPS		4 lights	\$14.24	684
250 W HPS		8 lights	\$18.81	1,806
		831 lights	Subtotal	<u>120,426</u>
RTA Charge ¹		405,600 kWh		
			Total	<u>120,426</u>
<u>Street Lighting Service (44-2)</u>				
175 W MV		lights	\$17.42	
250 W MV		3 lights	\$20.90	752
400 W MV		lights	\$26.86	
100 W HPS		38 lights	\$13.78	6,284
150 W HPS		646 lights	\$15.94	123,567
250 W HPS		1,597 lights	\$20.51	393,054
400 W HPS		1 lights	\$25.39	305
		2,285 lights	Subtotal	<u>523,962</u>
RTA Charge ¹		2,405,280 kWh		
			Total	<u>523,962</u>

¹ Proposed rates assume zero RTA.

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**Summary of Consumers, Energy Sales, and
Revenue Under Proposed Rates
(Continued)**

III. Estimate of Revenue Under Proposed Rates

<u>Rate Class</u>	<u>Billing Determinants</u>	<u>Units</u>	<u>Rate</u>	<u>Revenue</u>
<u>Street Lighting System (44-1)</u>				(\$)
175 W MV		lights	\$13.24	
250 W MV		lights	\$16.72	
400 W MV		lights	\$22.68	
100 W HPS		lights	\$9.60	
150 W HPS	101	lights	\$11.76	14,253
200 W HPS	101	lights	\$14.16	17,162
250 W HPS	272	lights	\$16.33	53,301
400 W HPS	13	lights	\$21.21	3,309
	487	lights	Subtotal	88,025
RTA Charge ¹	521,040	kWh		
			Total	88,025
<u>Custom Residential Street Lighting (44-3)</u>				
175 W MV		lights	\$14.01	
50 W HPS	81	lights	\$8.44	8,204
100 W HPS	8,416	lights	\$10.37	1,047,287
150 W HPS	3,732	lights	\$12.62	565,174
250 W HPS	4	lights	\$17.18	825
	12,233	lights	Subtotal	1,621,490
RTA Charge ¹	6,750,960	kWh		
			Total	1,621,490
<u>LED Security Lighting Service (44 -4)</u>				
LED, >4,500 Lumens	338	lights	\$7.74	31,393
RTA Charge ¹	64,896	kWh		
			Total	31,393

¹ Proposed rates assume zero RTA.

**Summary of Consumers, Energy Sales, and
Revenue Under Proposed Rates**
(Continued)

III. Estimate of Revenue Under Proposed Rates

Rate Class	Billing Determinants	Units	Rate	Revenue
<u>LED Street Lighting Member Owned(44-5)</u>				(\$)
A (40-80 watts)		lights	\$5.50	
B (81-150 watts)		lights	\$7.74	
C (151-250 watts)		11 lights	\$11.15	1,472
D (251-350 watts)		lights	\$15.02	
E (351-450 watts)		lights	\$19.04	
				1,472
RTA Charge ¹		8,712 kWh		1,472
<u>LED Street Lighting (44-6)</u>				
Standard				
>5,200 L, Coach (Post)		121 lights	\$9.29	13,489
>5,200 L, Acorn (Post)		48 lights	\$10.84	6,244
>7,000 L, Cobra (Mast)		91 lights	\$8.59	9,380
>11,500 L, Shoebox		151 lights	\$10.68	19,352
Basic				
>5,200 L, Coach (Post)		41 lights	\$6.35	3,124
>5,200 L, Acorn (Post)		lights	\$6.11	
>7,000 L, Cobra (Mast)		53 lights	\$6.97	4,433
>11,500 L, Shoebox		16 lights	\$8.67	1,665
				57,687
RTA Charge ¹		202,152 kWh		57,687
<u>Low Wattage Unmetered Service (45)</u>				
Fixed Charge		71 cons.	\$10.50	8,946

¹ Proposed rates assume zero RTA.

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**Summary of Consumers, Energy Sales, and
Revenue Under Proposed Rates**
(Continued)

III. Estimate of Revenue Under Proposed Rates

Rate Class	Billing Determinants	Units	Rate	Revenue
<u>Controlled Interruptible Service (52)</u>				(\$)
Energy Net Charge - Rate 31				
Summer	10,488,495	kWh	\$ 0.0631	661,824
Other	32,538,130	kWh	0.0631	2,053,156
Energy Charge - Rate 41				
Summer	64,095	kWh	\$0.06310	4,044
Other	386,791	kWh	\$0.06310	24,407
Energy Charge - Rate 46				
RTA Charge ¹	44,127,600		NA	41,021
Total				2,784,452
<u>Residential & Farm Time of Day (53)</u>				
Fixed Charge		18 cons.	\$13.00	2,808
Energy Charge				
Peak Period				
Summer	49,267	kWh	\$0.21263	10,476
Other	12,117	kWh	\$0.19863	2,407
Off-Peak Period				
	154,832	kWh	\$0.09450	14,632
	216,216	kWh	Subtotal	30,323
RTA Charge ¹	216,216	kWh		
Total				30,323
<u>General Service Time of Day (54)</u>				
Fixed Charge		6 cons.	\$39.00	2,808
Demand Charge				
Peak Period				
Summer	960.1	kW	\$26.14	25,097
Winter	436.9	kW	\$19.91	8,699
Other	1,253.2	kW	\$13.67	17,131
	2,650.2	kW		
Maximum	4,152.1	kW	\$5.25	21,799
Energy Charge				
	1,059,984	kWh	\$0.05210	55,225
Subtotal				130,759
Discounts				
Primary Voltage		kW	(\$0.15)	
Primary Metering			(2.00%)	
RTA Charge ¹	1,059,984	kWh		
Total				130,759

¹ Proposed rates assume zero RTA.

**Summary of Consumers, Energy Sales, and
Revenue Under Proposed Rates**
(Continued)

III. Estimate of Revenue Under Proposed Rates

Rate Class	Billing		Rate	Revenue
	Determinants	Units		
				(\$)
<u>Standby Service (60)</u>				
Generation Reservation Fee				
Summer	1,000	kW	\$3.21	9,630
Winter	1,000	kW	\$2.47	7,410
Other	1,000	kW	\$1.74	10,440
Distribution Reservation Fee				
Primary	1,000	kW	\$3.89	46,680
Secondary		kW	\$4.02	
			Total	<u>74,160</u>
<u>Full Interruptible Service (70)</u>				
Fixed Charge	234	cons.	\$130.00	365,040
Communication Fee	51		\$8.70	5,324
Coinc. Demand Charge				
Summer	1,042.8	kW	\$26.14	27,259
Winter		kW	\$19.91	
Other		kW	\$13.67	
Total Coinc Demand	1,042.8	kW		
Non-Coinc. Demand	858,880.1	kW	\$5.25	4,509,121
Failure to Control	1,042.8	kW	\$5.00	5,214
Energy Charge	379,080,000	kWh	\$0.05210	19,750,068
Discounts				Subtotal
Primary Voltage	47,311.1	kW	(\$0.15)	(\$7,097)
Primary Metering			(2.0%)	
RTA Charge ¹	379,080,000	kWh		
			Total	<u>24,654,929</u>
<u>Partial Interruptible Service (71)</u>				
Fixed Charge	28	cons.	\$130.00	43,680
Communication Fee	17		\$8.70	1,775
Coinc. Demand Charge				
Summer	3,212.2	kW	\$26.14	83,967
Winter	2,980.2	kW	\$19.91	59,336
Other	5,964.3	kW	\$13.67	81,532
Total Coinc Demand	12,156.7	kW		
Non-Coinc. Demand	111,609.5	kW	\$5.25	585,950
Excess Demand		kW	\$5.00	
Energy Charge	27,720,000	kWh	\$0.05210	1,444,212
Discounts				Subtotal
Primary Voltage	6,623	kW	\$0.15	(993)
Primary Metering			2.0%	-
RTA Charge ¹	27,720,000	kWh		
			Total	<u>2,299,459</u>

¹ Proposed rates assume zero RTA.

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**Summary of Consumers, Energy Sales, and
Revenue Under Proposed Rates**
(Continued)

III. Estimate of Revenue Under Proposed Rates

Rate Class	Billing Determinants	Units	Rate	Revenue
<u>Cycled Air Conditioning Service (80)</u>				
Option 1		kWh		
Option 2				
Residential Rate 8131	4,750,463	kWh	(\$0.03200)	(152,015)
Rate 8141	324,537	kWh	(\$0.03200)	(10,385)
Rate 8146		kWh	(\$0.03200)	
	5,075,000	kWh		(162,400)
Option 3				
Residential Rate 8231	35,158	cons.	(\$13.00)	(1,371,162)
Commercial		cons.	(\$13.00)	
				(1,371,162)
Option 4				
Rate 8441	4,699	tons	(\$6.50)	(91,631)
Rate 8446		tons	(\$6.50)	
	4,699			(91,631)
				(1,625,193)
		Total		
Wellspring				23,370
Grand Total	1,825,515,624			209,140,594

¹ Proposed rates assume zero RTA.

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**Summary of Consumers, Energy Sales, and
Revenue Under Proposed Rates**
(Continued)

III. Estimate of Revenue Under Proposed Rates

Rate Class	Billing Determinants	Units	Rate	Revenue (\$)
<u>General Service (46)</u>				
Fixed Charge	2,750	cons.	\$37.00	1,221,000
Demand Charge	1,442,500.4	kW		
Summer	413,627.7			
Summer Load Adjustment	(11,771.4)			
Net Summer	401,856.3	kW	\$13.76	5,529,543
Other	1,028,872.7			
Other Load Adjustment	(21,406.1)			
Net Other	1,007,466.6	kW	\$10.66	10,739,594
Energy Charge				
First 200 kWh/kW	264,418,387	kWh	\$0.07800	20,624,634
Next 200 kWh/kW	158,964,776	kWh	\$0.06800	10,809,605
Over 400 kWh/kW	38,616,837	kWh	\$0.05800	2,239,777
			Subtotal	51,164,153
Discounts				
Primary Voltage			(\$0.15)	
Primary Metering			(2.00%)	
RTA Charge ¹	462,000,000			
			Total	<u>51,164,153</u>
<u>Municipal Civil Defense Sirens (47)</u>				
Fixed Charge	66	kWh cons.	\$5.00	3,960
<u>Geothermal Heat Pump (49)</u>				
Energy Charge	172,800	kWh	\$0.10300	17,798
RTA Charge ¹	172,800	kWh		
			Total	<u>17,798</u>
<u>Controlled Energy Storage (51)</u>				
Energy Net Charge - Rate 31				
Summer	2,701,434	kWh	\$0.04870	131,560
Other	7,509,011	kWh	\$0.04870	365,689
Energy Charge - Rate 41				
Summer	6,874	kWh	\$0.04870	335
Other	39,232	kWh	\$0.04870	1,911
Energy Charge - Rate 46	51,449	kWh	\$0.04870	2,506
			Subtotal	502,001
RTA Charge ¹	10,308,000	kWh	NA	
			Total	<u>502,001</u>

¹ Proposed rates assume zero RTA.

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**Comparison of
Present and Proposed Rate Schedules**

Present Rates**Proposed Rates****Residential & Farm Service (31)**

Fixed Charge	@	\$9.00	/month
Energy Charge			
Summer	@	\$0.13080	/kWh
Other	@	\$0.11680	/kWh

Residential & Farm Service (31)

Fixed Charge	@	\$10.00	/month
Energy Charge			
Summer	@	\$0.13770	/kWh
Other	@	\$0.12380	/kWh

Residential & Farm Demand Control (32)

Fixed Charge	@	\$12.00	/month
Demand Charge			
Summer	@	\$14.70	/kW
Other	@	\$11.10	/kW
Energy Charge	@	\$0.07600	/kWh

Residential & Farm Demand Control (32)

Fixed Charge	@	\$13.00	/month
Demand Charge			
Summer	@	\$15.50	/kW
Other	@	\$11.90	/kW
Energy Charge	@	\$0.08090	/kWh

Electric Vehicle (33)

Energy Charge			
Off Peak	@	\$0.06740	/kWh
On Peak	@	\$0.41440	/kWh
Other			
Summer	@	\$0.13080	/kWh
Other	@	\$0.11680	/kWh

Electric Vehicle (33)

Energy Charge			
Off Peak	@	\$0.07550	/kWh
On Peak	@	\$0.44200	/kWh
Other			
Summer	@	\$0.13770	/kWh
Other	@	\$0.12380	/kWh

Irrigation Service (36)***Firm Service***

Fixed Charge	@	\$30.00	/month
Demand Charge			
Summer	@	\$26.35	/kW/mo.
Winter	@	\$20.95	/kW/mo.
Other	@	\$15.50	/kW/mo.
Energy Charge	@	\$0.04990	/kWh

Irrigation Service (36)***Firm Service***

Fixed Charge	@	\$33.00	/month
Demand Charge			/kW/mo.
Summer	@	\$26.40	/kW/mo.
Winter	@	\$21.00	
Other	@	\$15.52	/kW/mo.
Energy Charge	@	\$0.05210	/kWh

Interruptible Service

Fixed Charge	@	\$30.00	/month
Demand Charge	@	\$4.55	/kW/mo.
Energy Charge	@	\$0.04990	/kWh

Interruptible Service

Fixed Charge	@	\$33.00	/month
Demand Charge	@	\$4.30	/kW/mo.
Energy Charge	@	\$0.05210	/kWh

Small General Service (41)

Fixed Charge	@	\$14.00	/month
Energy Charge			
Summer	@	\$0.12690	/kWh
Other	@	\$0.11290	/kWh

Small General Service (41)

Fixed Charge	@	\$15.00	/month
Energy Charge			
Summer	@	\$0.13740	/kWh
Other	@	\$0.12340	/kWh

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**Comparison of
Present and Proposed Rate Schedules**
(Continued)

<u>Present Rates</u>				<u>Proposed Rates</u>			
<u>Security Lighting Service (44) - Closed to New</u>				<u>Security Lighting Service (44) - Closed to New</u>			
175 W MV	@	N/A	/month	175 W MV	@	N/A	/month
100 W HPS	@	\$10.10	/month	100 W HPS	@	\$12.00	/month
150 W HPS	@	\$11.99	/month	150 W HPS	@	\$14.24	/month
250 W HPS	@	\$15.79	/month	250 W HPS	@	\$18.81	/month
<u>Street Lighting System (44-1)</u>				<u>Street Lighting System (44-1)</u>			
175 W MV (Clsd to New)	@	\$10.52	/month	175 W MV (Clsd to New)	@	\$13.24	/month
250 W MV (Clsd to New)	@	\$13.46	/month	250 W MV (Clsd to New)	@	\$16.72	/month
400 W MV (Clsd to New)	@	\$18.54	/month	400 W MV (Clsd to New)	@	\$22.68	/month
100 W HPS (Clse to New)	@	\$7.56	/month	100 W HPS (Clse to New)	@	\$9.60	/month
150 W HPS	@	\$9.46	/month	150 W HPS	@	\$11.76	/month
200 W HPS	@	\$11.41	/month	200 W HPS	@	\$14.16	/month
250 W HPS	@	\$13.25	/month	250 W HPS	@	\$16.33	/month
400 W HPS	@	\$17.67	/month	400 W HPS	@	\$21.21	/month
<u>Street Lighting Service (44-2)</u>				<u>Street Lighting Service (44-2)</u>			
175 W MV (Clsd to New)	@	\$15.23	/month	175 W MV (Clsd to New)	@	\$17.42	/month
250 W MV (Clsd to New)	@	\$18.16	/month	250 W MV (Clsd to New)	@	\$20.90	/month
400 W MV (Clsd to New)	@	\$23.25	/month	400 W MV (Clsd to New)	@	\$26.86	/month
100 W HPS (Clsd to New)	@	\$12.27	/month	100 W HPS (Clsd to New)	@	\$13.78	/month
150 W HPS (Clsd to New)	@	\$14.16	/month	150 W HPS (Clsd to New)	@	\$15.94	/month
250 W HPS (Clsd to New)	@	\$17.95	/month	250 W HPS (Clsd to New)	@	\$20.51	/month
400 W HPS (Clsd to New)	@	\$22.38	/month	400 W HPS (Clsd to New)	@	\$25.39	/month
<u>Custom Residential Street Lighting (44-3)</u>				<u>Custom Residential Street Lighting (44-3)</u>			
175 W MV (Clsd to New)	@	\$11.37	/month	175 W MV (Clsd to New)	@	\$14.01	/month
50 W HPS (Clsd to New)	@	\$6.70	/month	50 W HPS (Clsd to New)	@	\$8.44	/month
100 W HPS	@	\$8.41	/month	100 W HPS	@	\$10.37	/month
150 W HPS (Clsd to New)	@	\$10.30	/month	150 W HPS (Clsd to New)	@	\$12.62	/month
250 W HPS (Clsd to New)	@	\$14.09	/month	250 W HPS (Clsd to New)	@	\$17.18	/month
<u>LED Security Lighting Service (44 -4)</u>				<u>LED Security Lighting Service (44 -4)</u>			
LED, >4,500 Lumens	@	7.63	/month	LED, >4,500 Lumens	@ \$	7.74	/month

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**Comparison of
Present and Proposed Rate Schedules**
(Continued)

<u>Present Rates</u>				<u>Proposed Rates</u>			
<u>LED Street Lighting Member Owned(44-5)</u>				<u>LED Street Lighting Member Owned(44-5)</u>			
A (40-80 watts)	@	4.81	/month	A (40-80 watts)	@	\$5.50	/month
B (81-150 watts)	@	\$6.71	/month	B (81-150 watts)	@	\$7.74	/month
C (151-250 watts)	@	\$9.66	/month	C (151-250 watts)	@	\$11.15	/month
D (251-350 watts)	@	\$13.05	/month	D (251-350 watts)	@	\$15.02	/month
E (351-450 watts)	@	\$16.52	/month	E (351-450 watts)		\$19.04	/month
<u>LED Street Lighting (44-6)</u>				<u>LED Street Lighting (44-6)</u>			
Standard							
>5,200 L, Coach (Post)	@	\$10.60	/month	>5,200 L, Coach (Post)	@	\$9.29	/month
>5,200 L, Acorn (Post)	@	\$11.24	/month	>5,200 L, Acorn (Post)	@	\$10.84	/month
>7,000 L, Cobra (Mast)	@	\$8.31	/month	>7,000 L, Cobra (Mast)	@	\$8.59	/month
>11,500 L, Shoebox	@	\$10.71	/month	>11,500 L, Shoebox	@	\$10.68	/month
Basic							
>5,200 L, Coach (Post)	@	\$6.83	/month	>5,200 L, Coach (Post)	@	\$6.35	/month
>5,200 L, Acorn (Post)	@	\$6.30	/month	>5,200 L, Acorn (Post)	@	\$6.11	/month
>7,000 L, Cobra (Mast)	@	\$6.51	/month	>7,000 L, Cobra (Mast)	@	\$6.97	/month
>11,500 L, Shoebox	@	\$7.98	/month	>11,500 L, Shoebox	@	\$8.67	/month
<u>Low Wattage Unmetered Service (45)</u>				<u>Low Wattage Unmetered Service (45)</u>			
Fixed Charge	@	\$10.00	/month	Fixed Charge	@	\$10.50	/month
<u>General Service (46)</u>				<u>General Service (46)</u>			
Fixed Charge	@	\$34.00	/month	Fixed Charge	@	\$37.00	/month
Demand Charge				Demand Charge			
Summer	@	\$12.26	/kW	Summer	@	\$13.76	/kW
Other	@	\$9.16	/kW	Other	@	\$10.66	/kW
Energy Charge				Energy Charge			
First 200 kWh/kW	@	\$0.07760	/kWh	First 200 kWh/kW	@	\$0.07800	/kWh
Next 200 kWh/kW	@	\$0.06760	/kWh	Next 200 kWh/kW	@	\$0.06800	/kWh
Over 400 kWh/kW	@	\$0.05760	/kWh	Over 400 kWh/kW	@	\$0.05800	/kWh
Primary Voltage Disc.	@	\$0.15	/kW	Primary Voltage Disc.	@	\$0.15	/kW
Primary Metering Disc.	@	2.00%		Primary Metering Disc.	@	2.00%	

**Comparison of
Present and Proposed Rate Schedules**
(Continued)

<u>Present Rates</u>				<u>Proposed Rates</u>			
<u>Municipal Civil Defense Sirens (47)</u>				<u>Municipal Civil Defense Sirens (47)</u>			
Fixed Charge	@	\$5.00	/month	Fixed Charge	@	\$5.00	/month
<u>Geothermal Heat Pump (49) Closed to New</u>				<u>Geothermal Heat Pump (49) Closed to New</u>			
Energy Charge	@	\$0.09400	/kWh	Energy Charge	@	\$0.10300	/kWh
<u>Controlled Energy Storage (51)</u>				<u>Controlled Energy Storage (51)</u>			
Net Energy Charge	@	\$0.04400	/kWh	Net Energy Charge	@	\$0.04870	/kWh
<u>Controlled Interruptible Service (52)</u>				<u>Controlled Interruptible Service (52)</u>			
Net Energy Charge	@	\$0.05500	/kWh	Net Energy Charge	@	\$0.06310	/kWh
Alternate Rate for Water Heaters		(\$6.00)	/month	Alternate Rate for Water Heaters		(\$6.00)	/month
<u>Residential & Farm Time of Day (53)</u>				<u>Residential & Farm Time of Day (53)</u>			
Fixed Charge	@	\$12.00	/month	Fixed Charge	@	\$13.00	/month
Energy Charge				Energy Charge			
Peak Period				Peak Period			
Summer	@	\$0.18800	/kWh	Summer	@	\$0.21263	/kWh
Other	@	\$0.17400	/kWh	Other	@	\$0.19863	/kWh
Off-Peak	@	\$0.09400	/kWh	Off-Peak	@	\$0.09450	/kWh
<u>General Service Time of Day (54)</u>				<u>General Service Time of Day (54)</u>			
Fixed Charge	@	\$36.00	/month	Fixed Charge	@	\$39.00	/month
Demand Charge				Demand Charge			
Peak Period				Peak Period			
Summer	@	\$24.85	/kW/mo.	Summer	@	\$26.14	/kW/mo.
Winter	@	\$18.95	/kW/mo.	Winter	@	\$19.91	/kW/mo.
Other	@	\$13.00	/kW/mo.	Other	@	\$13.67	/kW/mo.
Maximum	@	\$4.75	/kW	Maximum	@	\$5.25	/kW
Energy Charge	@	\$0.04990	/kWh	Energy Charge	@	\$0.05210	/kWh
Primary Voltage Disc.	@	\$0.15	/kW	Primary Voltage Disc.	@	\$0.15	/kW
Primary Metering Disc.	@	2.00%		Primary Metering Disc.	@	2.00%	

**Comparison of
Present and Proposed Rate Schedules
(Continued)**

<u>Present Rates</u>				<u>Proposed Rates</u>			
<u>Residential & Farm Service Time of Day (56)</u>				<u>Residential & Farm Service Time of Day (56)</u>			
Fixed Charge	@	\$12.00	/month	Fixed Charge	@	\$13.00	/month
Energy Charges				Energy Charges			
Peak Period				Peak Period			
Summer	@	\$0.2710	/kWh	Summer	@	\$0.2890	/kW/mo.
Winter	@	\$0.2210	/kWh	Winter	@	\$0.2320	/kW/mo.
Other	@	\$0.1750	/kWh	Other	@	\$0.1880	/kW/mo.
Intermediate Period	@	\$0.0970	/kWh	Intermediate Period	@	\$0.1060	/kWh
Off-Peak Period	@	\$0.0760	/kWh	Off-Peak Period	@	\$0.0820	/kWh
<u>Standby Service (60)</u>				<u>Standby Service (60)</u>			
Generation Reservation Fee				Generation Reservation Fee			
Summer	@	\$3.21	/kW	Summer	@	\$3.21	/kW
Winter	@	\$2.47	/kW	Winter	@	\$2.47	/kW
Other	@	\$1.74	/kW	Other	@	\$1.74	/kW
Distribution Reservation Fee				Distribution Reservation Fee			
Primary	@	\$3.28	/kW	Primary	@	\$3.89	/kW
Secondary	@	\$3.51	/kW	Secondary	@	\$4.02	/kW
Substation	@	\$0.90	/kW	Substation	@	\$0.81	/kW
<u>Full Interruptible Service (70)</u>				<u>Full Interruptible Service (70)</u>			
Fixed Charge	@	\$110.00	/month	Fixed Charge	@	\$130.00	/month
Communication Fee	@	\$8.70	/month	Communication Fee	@	\$8.70	/month
Coinc. Demand Charge				Coinc. Demand Charge			
Summer	@	\$24.85	/kW	Summer	@	\$26.14	/kW/mo.
Winter	@	\$18.95	/kW	Winter	@	\$19.91	/kW/mo.
Other	@	\$13.00	/kW	Other	@	\$13.67	/kW/mo.
Non-Coinc. Demand	@	\$4.75	/kW	Non-Coinc. Demand	@	\$5.25	/kW
Failure to Control		\$5.00	/kW	Failure to Control	@	\$5.00	/kW
Energy Charge	@	\$0.04990	/kWh	Energy Charge	@	\$0.05210	/kWh
Primary Voltage Disc.	@	\$0.15	/kW	Primary Voltage Disc.	@	\$0.15	/kW
Primary Metering Disc.	@	2.00%		Primary Metering Disc.	@	2.00%	
<u>Partial Interruptible Service (71)</u>				<u>Partial Interruptible Service (71)</u>			
Fixed Charge	@	\$110.00	/month	Fixed Charge	@	\$130.00	/month
Communication Fee	@	\$8.70	/month	Communication Fee	@	\$8.70	/month
Coinc. Demand Charge				Coinc. Demand Charge			
Summer	@	\$24.85	/kW	Summer	@	\$26.14	/kW/mo.
Winter	@	\$18.95	/kW	Winter	@	\$19.91	/kW/mo.
Other	@	\$13.00	/kW	Other	@	\$13.67	/kW/mo.
Non-Coinc. Demand	@	\$4.75	/kW	Non-Coinc. Demand	@	\$5.25	/kW
Excess Demand	@	\$5.00	/kW	Excess Demand	@	\$5.00	/kW
Energy Charge	@	\$0.04990	/kWh	Energy Charge	@	\$0.05210	/kWh
Primary Voltage Disc.	@	\$0.15	/kW	Primary Voltage Disc.	@	\$0.15	/kW
Primary Metering Disc.	@	2.00%		Primary Metering Disc.	@	2.00%	

**Comparison of
Present and Proposed Rate Schedules**
(Continued)

<u>Present Rates</u>				<u>Proposed Rates</u>			
<u>Cycled Air Conditioning Service (80)</u>				<u>Cycled Air Conditioning Service (80)</u>			
Option 1	@		/kWh	Option 1	@		/kWh
Option 2	@	(\$0.03200)	/kWh	Option 2	@	(\$0.03200)	/kWh
Option 3	@	(\$13.00)	/month	Option 3	@	(\$13.00)	/month
Option 4	@	(\$6.50)	/ton/mo.	Option 4	@	(\$6.50)	/ton/mo.

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**Comparison of Revenue
Present and Proposed Rates**

(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
Line No.	Rate Class	Revenue Present Rates	Original Revenue Proposed Rates	Increase (Decrease)		Settlement Agreement Adjustments Present Rates	Settlement Agreement Revenue Present Rates	Revenue Proposed Rates	Increase (Decrease)	
		(\$)	(\$)	Amount	Percent			(\$)	Amount	Percent
				(\$)	(%)				(\$)	(%)
1	Residential & Farm Service (31)	114,332,035	119,389,671	5,057,636	4.42	148,612	114,480,647	119,434,146	4,953,499	4.33
2	Residential & Farm Demand Control (32)	42,670	44,529	1,859	4.36		42,670	44,491	1,821	4.27
3	Electric Vehicle (33)	24,636	26,505	1,869	7.59		24,636	26,475	1,839	7.46
4	Irrigation Service (36) Firm	50,143	50,484	341	0.68		50,143	50,448	305	0.61
5	Irrigation Service (36) Interruptible	862,089	883,153	21,064	2.44		862,089	878,380	16,291	1.89
6	Small General Service (41)	5,799,609	6,197,337	397,728	6.86		5,799,609	6,193,082	393,473	6.78
7	Security Lighting Service (44) - Closed to New	102,369	120,526	18,157	17.74		102,369	120,426	18,057	17.64
8	Street Lighting Service (44-2)	466,293	524,779	58,486	12.54		466,293	523,962	57,669	12.37
9	Street Lighting System (44-1)	72,603	88,142	15,539	21.40		72,603	88,025	15,422	21.24
10	Custom Residential Street Lighting (44-3)	1,334,683	1,623,968	289,285	21.67		1,334,683	1,621,490	286,807	21.49
11	LED Security Lighting Service (44 -4)	31,109	31,434	325	1.04		31,109	31,393	284	0.91
12	LED Street Lighting Member Owned(44-5)	1,297	1,473	176	13.57		1,297	1,472	175	13.49
13	LED Street Lighting (44-6)	59,884	57,768	(2,116)	(3.53)		59,884	57,687	(2,197)	(3.67)
14	Low Wattage Unmetered Service (45)	8,520	8,946	426	5.00		8,520	8,946	426	5.00
15	General Service (46)	50,261,766	51,183,966	922,200	1.83		50,261,766	51,164,153	902,387	1.80
16	Municipal Civil Defense Sirens (47)	3,960	3,960	-	-		3,960	3,960	-	-
17	Geothermal Heat Pump (49) Closed to New	16,571	17,798	1,227	7.40		16,571	17,798	1,227	7.40
18	Controlled Energy Storage (51)	459,736	502,001	42,265	9.19		459,736	502,001	42,265	9.19
19	Controlled Interruptible Service (52)	2,634,418	2,784,452	150,034	5.70		2,634,418	2,784,452	150,034	5.70
20	Residential & Farm Time of Day (53)	29,057	30,323	1,266	4.36		29,057	30,323	1,266	4.36
21	General Service Time of Day (54)	126,286	130,543	4,257	3.37		126,286	130,759	4,473	3.54
22	Standby Service (60)	66,840	74,160	7,320	10.95		66,840	74,160	7,320	10.95
23	Full Interruptible Service (70)	23,144,467	24,654,929	1,510,462	6.53		23,144,467	24,654,929	1,510,462	6.53
24	Partial Interruptible Service (71)	2,151,089	2,299,459	148,370	6.90		2,151,089	2,299,459	148,370	6.90
25	Cycled Air Conditioning Service (80)	(1,625,193)	(1,625,193)	-	-		(1,625,193)	(1,625,193)	-	-
26	Wellspring	23,370	23,370	-	-		23,370	23,370	-	-
27	Total	200,480,307	209,128,483	8,648,176	4.31	148,612	200,628,919	209,140,594	8,511,675	4.25
Other Operating Revenue			1,100,791				1,100,791	1,134,788	33,997	
Total Revenue			210,229,274					210,275,382		
Allowed Total Revenue Increase				8,727,396					8,551,181	
Other Operating Revenue Increase				-					33,997	
Allowed Tariffed Revenue Increase				8,727,396					8,517,184	
Additional Increase Allowed/ (Excess)				79,220					5,509	

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Aafedt	daafedt@winthrop.com	Winthrop & Weinstine, P.A.	Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-478_GR-19-478
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street Bismarck, ND 585014092	Electronic Service	No	OFF_SL_19-478_GR-19-478
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Lane PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-478_GR-19-478
Kenneth	Baker	Ken.Baker@walmart.com	Wal-Mart Stores, Inc.	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_19-478_GR-19-478
Carolyn	Berninger	cberninger@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-478_GR-19-478
James J.	Bertrand	james.bertrand@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-478_GR-19-478
Brenda A.	Bjorklund	brenda.bjorklund@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-478_GR-19-478
Lizzie	Brodeen Kuo	lbrodeen-kuo@kennedy-graven.com	Kennedy & Graven	470 US Bank Plaza 200 S Sixth St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-478_GR-19-478
C. Ian	Brown	office@gasworkerslocal340.com	United Association	Gas Workers Local 340 312 Central Ave SW Minneapolis, MN 55414	Electronic Service	No	OFF_SL_19-478_GR-19-478
James	Canaday	james.canaday@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota St. St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-478_GR-19-478

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_19-478_GR-19-478
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-478_GR-19-478
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_19-478_GR-19-478
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_19-478_GR-19-478
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-478_GR-19-478
Shannon	Geshick	shannon.geshick@state.mn.us	Minnesota Indian Affairs Council (MIAC)	N/A	Electronic Service	No	OFF_SL_19-478_GR-19-478
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-478_GR-19-478
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1800 St. Paul, MN 55101-2134	Electronic Service	Yes	OFF_SL_19-478_GR-19-478
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_19-478_GR-19-478
Bruce L.	Hoffarber	bhoffarber@kinectenergy.com	Kinect Energy Group	605 North Highway 169 Ste 1200 Plymouth, MN 55441	Electronic Service	No	OFF_SL_19-478_GR-19-478

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Holly	mholly@winthrop.com	Winthrop & Weinstine, P.A.	225 S Sixth St Ste 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-478_GR-19-478
Rebekah	Howell	Rebekah.Howell@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_19-478_GR-19-478
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_19-478_GR-19-478
Jody	Johnson	jody.johnson@piic.org	Prairie Island Indian Community	N/A	Electronic Service	No	OFF_SL_19-478_GR-19-478
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-478_GR-19-478
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-478_GR-19-478
Daniel	LeFevers	dlefevers@gti.energy	GTI	1700 S Mount Prospect Rd Des Plains, IL 60018	Electronic Service	No	OFF_SL_19-478_GR-19-478
Roger	Leider	roger@mnpropane.org	Minnesota Propane Association	PO Box 220 209 N Run River Dr Princeton, MN 55371	Electronic Service	No	OFF_SL_19-478_GR-19-478
Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_19-478_GR-19-478
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_19-478_GR-19-478

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Loeffler	mike.loeffler@nngco.com	Northern Natural Gas Co.	CORP HQ, 714 1111 So. 103rd Street Omaha, NE 681241000	Electronic Service	No	OFF_SL_19-478_GR-19-478
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-478_GR-19-478
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_19-478_GR-19-478
Gregory C.	Miller	gmiller@dakotaelectric.com	Dakota Electric Association	4300 220th Street West Farmington, MN 55024	Electronic Service	No	OFF_SL_19-478_GR-19-478
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-478_GR-19-478
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-478_GR-19-478
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_19-478_GR-19-478
Mike	OConnor	moconnor@ibewlocal949.org	Local 949 IBEW	12908 Nicollet Ave S Burnsville, MN 55337	Electronic Service	No	OFF_SL_19-478_GR-19-478
Jeff	Oxley	jeff.oxley@state.mn.us	Office of Administrative Hearings	600 North Robert Street St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-478_GR-19-478
Greg	Palmer	gpalmer@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_19-478_GR-19-478

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-478_GR-19-478
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_19-478_GR-19-478
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-478_GR-19-478
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-478_GR-19-478
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_19-478_GR-19-478
Peggy	Sorum	peggy.sorum@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-478_GR-19-478
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-478_GR-19-478
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-478_GR-19-478
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_19-478_GR-19-478

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Lou Ann	Weflen	lweflen@dakotaelectric.com	Dakota Electric Association	4300 220th Street West Farmington, MN 55024	Electronic Service	No	OFF_SL_19-478_GR-19-478
Heather	Westra	hwestra@piic.org	Prairie Island Indian Community	5636 Sturgeon Lake Rd Welch, MN 55089	Electronic Service	No	OFF_SL_19-478_GR-19-478
Samantha	Williams	swilliams@nrdc.org	Natural Resources Defense Council	20 N. Wacker Drive Ste 1600 Chicago, IL 60606	Electronic Service	No	OFF_SL_19-478_GR-19-478
Joseph	Windler	jwindler@winthrop.com	Winthrop & Weinstine	225 South Sixth Street, Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-478_GR-19-478
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_19-478_GR-19-478
Jonathan	Wolfgram	Jonathan.Wolfgram@state.mn.us	Office of Pipeline Safety	Minnesota Department of Public Safety 445 Minnesota Street Suite 147 St. Paul, MN 55101-1547	Electronic Service	No	OFF_SL_19-478_GR-19-478
Scott	Zemke	szemke@capsh.org	Community Action Partnership	of Suburban Hennepin 8800 Highway 7, Ste. 401 St. Louis Park, MN 55426	Electronic Service	No	OFF_SL_19-478_GR-19-478