Minnesota Energy Resources Corporation
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Rosemount, MN 55068
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August 4, 2021

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

VIA ELECTRONIC FILING

Re: In the Matter of Minnesota Energy Resources Corporation's Gas Affordability Program 2020 Annual Report, Docket No. G011/M-21-224

Supplemental Reply Comments of Minnesota Energy Resources Corporation

Dear Mr. Seuffert:

On July 21, 2021, the Minnesota Department of Commerce, Division of Energy Resources (the "Department") filed Supplemental Initial Comments in the above-referenced docket continuing to recommend that the Minnesota Public Utilities Commission ("Commission") accept Minnesota Energy Resources Corporation's ("MERC" or the "Company's") 2020 Gas Affordability Program ("GAP") Annual Report. The Department also reviewed and responded to MERC's June 28, 2021 Reply Comments, recommending that the Commission:

1) Approve MERC's proposal to temporarily suspend the $750,000 annual spending cap until a permanent modification to its 3% threshold is approved;
2) Require MERC to, as soon as possible, reduce the affordability threshold to 3% until the tracker balance is under $50,000, at which point MERC would then be required to submit, in its next scheduled GAP filing, a proposal regarding whether to revert, maintain, or otherwise modify the affordability threshold; whether to reduce the surcharge; as well as what to do regarding the spending cap;
3) Require MERC to ensure that its affordability credits and energy assistance payments ("EAPs") are only applied as a reduction to customer's bills and/or positive arrearage balances; and
4) If applicable, require MERC to apply any existing negative arrearage balance as an immediate credit to the applicable customers' bills until the credit is used up. If MERC cannot fully apply the negative arrearage balance over a 12-month period, for issues such as a customer leaving MERC's service territory, MERC should add the credit to the tracker balance, where the funds can be applied to other customers.

Lastly, the Department recommends that the Commission reject MERC's proposal to take certain customer credits and directly reallocate them to other customers and reject MERC's alternative proposal to use about $1.1 million of the tracker balance as a one-time credit to eliminate existing Low Income Home Energy Assistance Program ("LIHEAP") customer arrears.

MERC thanks the Department for their analysis and review and provides the following Supplemental Reply Comments responding to the Department's recommendations.

Modification to the Affordability Threshold

As discussed in MERC's annual report, MERC's GAP tracker balance at the end of 2020 was a positive balance of $2,280,485. In its March 31, 2021 Report ("Report"), MERC initially proposed to address this positive balance and the possible need to adjust the surcharge rate in its next GAP Evaluation Report due May 31, 2022. Additionally, in MERC's October 30, 2020 Comments in Docket No. E,G999/CI-20-375, the Company stated it was open to modifying its GAP program parameters to apply a lower percent of income threshold but that such modification should be evaluated in the Company's next evaluation report. However, in MERC's June 28, 2021 Reply Comments in this docket, the Company stated it would be open to modifying the program affordability credit from the currently approved 6 percent of income threshold to a 3 percent of income threshold before its next evaluation report.

In order to implement this change, the Company will require assistance from the Department to obtain current income information for all approximately 1,100 GAP participants. MERC has already started this process. Once the required information is gathered, the Company estimates that it would take approximately 3 to 6 months to process the information for all of the GAP participants. MERC is in agreement with the Department's recommendation that the Company, as soon as feasible, reduce the affordability threshold to 3 percent until the tracker balance is under $50,000. At that time, the Company will submit, in its next scheduled GAP filing, a proposal regarding whether to revert, maintain, or otherwise modify the affordability threshold; whether to reduce the surcharge, as well as what to do regarding the spending cap.

MERC has attached to these Reply Comments redline tariff revisions for the Commission's consideration reflecting this program modification, and proposes to implement these changes after Commission approval and once the Company is able to process the necessary information. MERC proposes to submit a compliance filing in advance of implementation, reflecting an effective date of the approved tariff modifications. Additionally, these tariff revisions also reflect MERC's agreement with the Department's recommendation to approve the Company's proposal to temporarily suspend the $750,000 annual spending cap until a permanent modification to its 3 percent threshold is approved.

As noted in the Department's June 4, 2021 Comments, it is possible that in the second half of this year, there may be increased interest in and customer need for GAP, for at least three reasons: 1) increased funding and eligibility for LIHEAP; 2) the resumption of disconnections; 3) higher arrearages for some customers. MERC continues to agree to report in its 2021 GAP Annual Report to be filed in March 2022 regarding any unusual enrollment trends due to pandemic-related factors, consistent with the Department's recommendation.[1]

Affordability Credits and EAPs Applied as a Reduction

The Department recommends that MERC be required to ensure that its affordability credits and EAPs are only applied as a reduction to customer bills and/or positive arrearage balances. As explained in MERC's June 28, 2021 Reply Comments, the credit balances on GAP customer accounts are due to the monthly affordability credits and EAPs that are applied to customer accounts.[2] However, a customer who qualifies for and receives LIHEAP can remain enrolled in GAP after paying down their account arrears. Such customers will continue to receive affordability bill credits, which are one-twelfth of the difference between MERC's estimate of the customer's annual gas bill and 6 percent of the customer's household income, as provided by the customer to MERC.[3] Additionally, customers enrolled in GAP can continue to receive additional EAPs annually. In the event that a customer continues to remain enrolled in MERC's GAP, continues to receive EAPs, and those continuing annual EAPs plus the affordability credit exceeds a customer's monthly utility bill, that customer will accumulate a credit balance on their account.

The Department recommends that the Company stop allowing affordability credits or EAPs to build any credit on customer accounts on a going forward basis.[4] As stated above, MERC notes that customers, whether they are or are not in arrears, can continue to receive EAPs annually. When those EAPs are applied to the customers' account, they can create a credit balance. Consistent with the terms of the EAP Policy Manual, the Company cannot stop applying the full amount of the EAP to a customer's account unless the household discontinues as a customer or a refund is requested by

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[1] Department Comments at 18.
[2] The Company also confirmed in its June 28, 2021 Reply Comments with respect to the arrearage forgiveness component of MERC's GAP, that once a customer's arrears are paid off through a combination of arrearage forgiveness credits and customer payments, the arrearage forgiveness benefit terminates and therefore would not cause a credit balance on a customer's account.
[3] MERC Tariff Sheet No. 7.09, Section 2.1.
[4] The Department recommends that the Commission require MERC to ensure that its affordability credits and EAPs are only applied as a reduction to customer's bills and/or positive arrearage balances. Therefore, if a customer has $0 bill after a portion of the affordability credit and EAP is used up, any remaining affordability credits or EAP would only be applied to any past-due balance. If the customer has no past-due balance on their account, the remaining amounts would be not be applied for the month.

the EAP Service Provider.[5] As a result, MERC cannot eliminate instances where application of an EAP causes a credit balance to a customer's account.

With respect to affordability credits causing a credit balance, MERC is open to making the recommended change to not allow GAP credits to build any credit on customer accounts on a going forward basis; however, this change will require billing system configuration changes, as well as process changes, and the Company estimates that this would require six months to implement. Additionally, the Department's recommendation would require tariff revisions, which MERC has attached to these Reply Comments for the Commission's consideration.

If the Commission were to approve this Department recommendation, upon the Commission's Order, MERC would start to implement the billing system and process changes, and agrees to report in its 2021 GAP Annual Report to be filed in March 2022 regarding progress on implementation and an expected completion date.

Apply Existing Negative Arrearage Balance as an Immediate Credit

For the existing credit balances, the Department recommends that MERC be required to apply any existing negative arrearage balance to a customer's monthly account balance until the credit is used up, and doing so for up to and no longer than 12-months. If the full negative arrearage balance is not utilized over the 12-month period, or in instances such as a customer leaving MERC's service territory, the Company should credit any remaining amounts to the tracker balance, where the funds can be applied to other customers.

Currently, MERC does apply existing negative arrearage balances as a credit against the customer's bill until the credit is used up. But the Company notes that it may, and in some instances, does take longer than 12-months to utilize the full negative arrearage balance. The Department is recommending that if the negative arrearage balance cannot be fully applied over a 12-month period, then the Company should add the credit to the tracker balance. Utilizing a 12-month period to apply the credit would be a change to MERC's current practice, and as noted above, with respect to EAP payments, would conflict with the Energy Assistance Program policy guidance. MERC cannot credit EAP to the GAP tracker and is required to return any credits to the Energy Assistance Program, for example, when a customer moves and is no longer a MERC customer. With respect to GAP affordability payments, the change to only carry forward existing credit balances for 12-months would require system configuration changes to the billing system, as well as process changes. As with the configuration and process

[5] Minnesota Department of Commerce, Energy Assistance Program Policy Manual, FFY2, Chapter 3, Page 5, https://mn.gov/commerce-stat/pdfs/ffy2021-eap-policy-manual.pdf. ("If the household account is active, EAP benefits must remain on the household account, unless the household discontinues as a customer or a refund is requested by the Service Provider. In each case, refunds must be made to the Energy Assistance Program.").

changes discussed above, the Company estimates that this would require six months to implement. Additionally, the Department's recommendation would require tariff revisions, of which MERC has attached to these Reply Comments redline tariff revisions for the Commission's consideration.

If the Commission were to approve this recommendation, upon the Commission's Order, MERC would start to implement the billing system and process changes, and agrees to report in its 2021 GAP Annual Report to be filed in March 2022 regarding progress on implementation and an expected completion date.

MERC notes that it is current practice that GAP credits are returned to the GAP tracker balance for future use when GAP participant's leave MERC's service territory.[6]

Department's Rejection of MERC's Additional Proposals to Reduce the Tracker Balance

The Department recommends that the Commission reject MERC's proposal to utilize a portion of the GAP tracker balance to pay down LIHEAP customers'[7] arrearage balances on a one-time basis and reject MERC's alternative proposal to reallocate the negative arrears balances (i.e., credit balances) of GAP participants[8] to pay down non-GAP, LIHEAP customers' arrearage balances on a one-time basis. In light of the impact of the COVID pandemic on customers and the Department's request for initial thoughts on how to address the large tracker balance, MERC suggested these possible program modifications. The Department does not believe either of these proposals are an optimal solution, therefore MERC withdraws these two proposals.

Please contact me at (414) 221-4208 if you have any questions regarding the information in this filing. Thank you for your attention to this matter.

Sincerely,

Joylyn C. Hoffman Malueg

Joylyn C. Hoffman Malueg
Project Specialist 3
Minnesota Energy Resources Corporation

[6] See Attachment A, MERC's tracker provided in the Company's March 1, 2021 Initial Filing, column labeled "Credits Due to Final Accounts."
[7] MERC proposed to define LIHEAP customers as those customers who have qualified for LIHEAP in one of the past two years (2019 and 2020) or have currently been approved for LIHEAP and have arrearage balances greater than $100.
[8] MERC proposed to define GAP participants with credit balances as being those GAP participants with credit balances greater than $500.

Enclosures
cc: Service List

Redline Tariff Sheets

1. Availability:

GAP is available to residential customers in the MERC Minnesota service area who have been qualified and receive assistance from the Low Income Home Energy Assistance Program ("LIHEAP") during the federal fiscal year ("Program Year").

2. Program Description and Rate Impact for Qualifying Customers:

This Program shall meet the conditions of Minnesota Statutes, Chapter 216B.16, Subd. 15 on low income programs. The Program has two components: 1) Affordability, and 2) Arrearage Forgiveness. MERC or an agent of MERC, will review current billing and consumption information, approved LIHEAP benefits and household income information as submitted to MERC to determine a Qualified Customer's affordability bill credit and arrearage forgiveness. A Qualified Customer's payment each month shall include both payment of the customer's current month's bill after inclusion of the affordability bill credit, and payment of a portion of the Qualified Customer's pre-program arrears.

2.1. *Affordability Component:*

The Affordability component consists of a bill credit determined as one-twelfth of the difference between MERC's estimate of the Qualified Customer's annual gas bill and 3~~6~~% of the Qualified Customer's household income as provided by the Qualified Customer to MERC. This bill credit is a Program cost that will be included in the Tracker. Any energy assistance sums not applied to arrears will be applied to a Qualified Customer's current bill. Application of the affordability credit to a Qualified C~~c~~ustomer's account cannot create a credit balance on their account. In instances where application of the affordability credit would cause a credit balance, an affordability credit will only be applied in an amount that causes the Qualified Customers' account to reduce to $0.

In instances where a Qualified Customer's account accrues a negative arrears balance, the credit balance shall be applied to the customer's bill over a period of time until such credit balance is eliminated, with that time period lasting no longer than 12-months. Credit balances remaining at the end of the 12-month period will be removed from the customer's account and credited to the Tracker.

2.2. *Arrearage Forgiveness Component:*

The Arrearage Forgiveness component consists of a monthly credit that will be applied each month after receipt of the Qualified Customer's payment. The credit will be designed to retire pre-program arrears over a period of up to 24 months, with the Company matching the Qualifying Customer's contribution to retiring pre-program arrears. The credit is determined by taking the pre-program arrears divided by the number of months to retire the arrears divided by two and then subtracting any energy assistance sums received by the Company on behalf of the customer divided by the number of months remaining to retire the arrears divided by two. This arrearage forgiveness credit is a Program cost that will be included in the Tracker.

3. Conditions of Service:

3.1. Enrollment participation is limited to a first come first served basis until the estimated Program dollar cap is reached. This limitation is suspended effective with the 2021 calendar year until reinstated by the MPUC.

3.2. Before the start of an enrollment period, MERC will mail information on the Program and an application to participate in the Program to targeted current LIHEAP customers in arrears. The application for participation must be completed in full and returned to MERC before the close of the enrollment period.

3.3. Regardless of arrears balances, MERC agrees to maintain service and suspend collection activities to Qualified Customers if they maintain their payment schedule.

3.4. Qualified Customers must maintain an active MERC account in said customer's name at their permanent primary residence only to be eligible for this Program.

3.5. Qualified Customers agree to notify MERC of any changes in address, income level, or household size. Such changes may result in removal from the Program. Additionally, Qualified Customers who do not continue to qualify under the provisions of Section 1 above can be removed from the Program.

3.6 If a Qualified Customer fails to pay two consecutive monthly payments in full under the Program, they will be terminated from the Program and will be subject to MERC's regular collection practices including the possibility of disconnection.

4. Funding:

4.1. Total Program costs, which include start-up costs, Affordability component, Arrearage Forgiveness component and incremental administration costs incurred collectively by MERC shall not exceed $750,000 per year plus the estimated tracker balance as of December 31, 2011. This annual spending cap is suspended until reinstated by the MPUC. MERC shall limit administrative costs included in the Tracker (except start-up related costs) to 5% of total Program costs. Administrative costs will include, but are not limited to, the costs to inform customers of the Program and costs to process and implement enrollments.

4.2. MERC shall recover Program costs in the Delivery Charge applicable to all firm service customers receiving service under Rate Schedules GS-NNG General Service and GS-Consolidated General Service.

4.3. A tracking mechanism ("Tracker") will be established to provide for recovery of actual Program costs as compared to the recovery of Program costs through rates. MERC will track and defer Program costs with regulatory approval. The prudency of the Program costs are subject to regulatory review.

4.4. Program costs shall be recovered in the GAP Surcharge for all firm service customers receiving service under Rate Schedules GS-NNG General Service and GS-Consolidated General Service. Effective April 1, 2019, the surcharge shall be $0.00905 per therm. MERC may petition the Commission to adjust this rate in order to true-up the Program balance in the Tracker either in a general rate case, in an annual GAP report filing, or in a future GAP evaluation filing. .

5. Evaluation:

5.1. The Program shall be evaluated once every three years and may be modified based on annual reports and on a financial evaluation.

5.2. The annual reports will include the effect of the Program on customer payment frequency, payment amount, arrearage level and number of customers in arrears, service disconnections, retention rates, customer complaints and utility customer collection activity. The annual reports may also include information about customer satisfaction with the Program.

5.3. The financial evaluation will include a discounted cash flow of the Program's cost-effectiveness analysis from a ratepayer perspective comparing the 1) total Program costs, which includes the Affordability component, Arrearage Forgiveness component and total company incurred administration costs, to 2) the total net savings including cost reductions on utility functions such as the impact of the Program on write-offs, service disconnections and reconnections and collections activities. The discounted cash flow difference between total Program costs and total net savings will result in either a net benefit or a net cost to ratepayers for the Program.

6. Program Revocation:

The Program is effective unless the Commission, after notice and hearing, rescinds or amends its order approving the Program.

7. Term:

The Program is approved on a permanent basis, with annual reports to be filed by March 31 each year and a program evaluation to be filed every three years, beginning May 31, 2022 covering Program years 2019-2021.

8. Applicability:

Unless otherwise specified in this tariff, Qualified Customers in the Program shall receive service in accordance with all terms and conditions of the standard gas service tariffs applicable to residential customers.

Clean Tariff Sheets

GAS AFFORDABILITY PROGRAM (GAP) 5th Revised Sheet No. 7.09

1. Availability:
GAP is available to residential customers in the MERC Minnesota service area who have been qualified and receive assistance from the Low Income Home Energy Assistance Program ("LIHEAP") during the federal fiscal year ("Program Year").

2. Program Description and Rate Impact for Qualifying Customers:
This Program shall meet the conditions of Minnesota Statutes, Chapter 216B.16, Subd. 15 on low income programs. The Program has two components: 1) Affordability, and 2) Arrearage Forgiveness. MERC or an agent of MERC, will review current billing and consumption information, approved LIHEAP benefits and household income information as submitted to MERC to determine a Qualified Customer's affordability bill credit and arrearage forgiveness. A Qualified Customer's payment each month shall include both payment of the customer's current month's bill after inclusion of the affordability bill credit, and payment of a portion of the Qualified Customer's pre-program arrears.

2.1. *Affordability Component:*
The Affordability component consists of a bill credit determined as one-twelfth of the difference between MERC's estimate of the Qualified Customer's annual gas bill and 3% of the Qualified Customer's household income as provided by the Qualified Customer to MERC. This bill credit is a Program cost that will be included in the Tracker. Any energy assistance sums not applied to arrears will be applied to a Qualified Customer's current bill. Application of the affordability credit to a Qualified Customer's account cannot create a credit balance on their account. In instances where application of the affordability credit would cause a credit balance, an affordability credit will only be applied in an amount that causes the Qualified Customers' account to reduce to $0.

In instances where a Qualified Customer's account accrues a negative arrears balance, the credit balance shall be applied to the customer's bill over a period of time until such credit balance is eliminated, with that time period lasting no longer than 12-months. Credit balances remaining at the end of the 12-month period will be removed from the customer's account and credited to the Tracker.

2.2. *Arrearage Forgiveness Component:*
The Arrearage Forgiveness component consists of a monthly credit that will be applied each month after receipt of the Qualified Customer's payment. The credit will be designed to retire pre-program arrears over a period of up to 24 months, with the Company matching the Qualifying Customer's contribution to retiring pre-program arrears. The credit is determined by taking the pre-program arrears divided by the number of months to retire the arrears divided by two and then subtracting any energy assistance sums received by the Company on behalf of the customer divided by the number of months remaining to retire the arrears divided by two. This arrearage forgiveness credit is a Program cost that will be included in the Tracker.

3. Conditions of Service:

3.1. Enrollment participation is limited to a first come first served basis until the estimated Program dollar cap is reached. This limitation is suspended effective with the 2021 calendar year until reinstated by the MPUC.

3.2. Before the start of an enrollment period, MERC will mail information on the Program and an application to participate in the Program to targeted current LIHEAP customers in arrears. The application for participation must be completed in full and returned to MERC before the close of the enrollment period.

3.3. Regardless of arrears balances, MERC agrees to maintain service and suspend collection activities to Qualified Customers if they maintain their payment schedule.

3.4. Qualified Customers must maintain an active MERC account in said customer's name at their permanent primary residence only to be eligible for this Program.

3.5. Qualified Customers agree to notify MERC of any changes in address, income level, or household size. Such changes may result in removal from the Program. Additionally, Qualified Customers who do not continue to qualify under the provisions of Section 1 above can be removed from the Program.

3.6 If a Qualified Customer fails to pay two consecutive monthly payments in full under the Program, they will be terminated from the Program and will be subject to MERC's regular collection practices including the possibility of disconnection.

4. Funding:

4.1. Total Program costs, which include start-up costs, Affordability component, Arrearage Forgiveness component and incremental administration costs incurred collectively by MERC shall not exceed $750,000 per year plus the estimated tracker balance as of December 31, 2011. This annual spending cap is suspended until reinstated by the MPUC. MERC shall limit administrative costs included in the Tracker (except start-up related costs) to 5% of total Program costs. Administrative costs will include, but are not limited to, the costs to inform customers of the Program and costs to process and implement enrollments.

4.2. MERC shall recover Program costs in the Delivery Charge applicable to all firm service customers receiving service under Rate Schedules GS-NNG General Service and GS-Consolidated General Service.

4.3. A tracking mechanism ("Tracker") will be established to provide for recovery of actual Program costs as compared to the recovery of Program costs through rates. MERC will track and defer Program costs with regulatory approval. The prudency of the Program costs are subject to regulatory review.

4.4. Program costs shall be recovered in the GAP Surcharge for all firm service customers receiving service under Rate Schedules GS-NNG General Service and GS-Consolidated General Service. Effective April 1, 2019, the surcharge shall be $0.00905 per therm. MERC may petition the Commission to adjust this rate in order to true-up the Program balance in the Tracker either in a general rate case, in an annual GAP report filing, or in a future GAP evaluation filing. .

5. Evaluation:

5.1. The Program shall be evaluated once every three years and may be modified based on annual reports and on a financial evaluation.

5.2. The annual reports will include the effect of the Program on customer payment frequency, payment amount, arrearage level and number of customers in arrears, service disconnections, retention rates, customer complaints and utility customer collection activity. The annual reports may also include information about customer satisfaction with the Program.

5.3. The financial evaluation will include a discounted cash flow of the Program's cost-effectiveness analysis from a ratepayer perspective comparing the 1) total Program costs, which includes the Affordability component, Arrearage Forgiveness component and total company incurred administration costs, to 2) the total net savings including cost reductions on utility functions such as the impact of the Program on write-offs, service disconnections and reconnections and collections activities. The discounted cash flow difference between total Program costs and total net savings will result in either a net benefit or a net cost to ratepayers for the Program.

6. Program Revocation:

The Program is effective unless the Commission, after notice and hearing, rescinds or amends its order approving the Program.

7. Term:

The Program is approved on a permanent basis, with annual reports to be filed by March 31 each year and a program evaluation to be filed every three years, beginning May 31, 2022 covering Program years 2019-2021.

8. Applicability:

Unless otherwise specified in this tariff, Qualified Customers in the Program shall receive service in accordance with all terms and conditions of the standard gas service tariffs applicable to residential customers.

Minnesota Energy Resources Corporation's
Gas Affordability Program 2020 Annual Report Docket No. G011/M-21-224

CERTIFICATE OF SERVICE

I, Colleen T. Sipiorski, hereby certify that on the 4th day of August, 2021, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed Supplemental Reply Comments of Minnesota Energy Resources Corporation on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 4th day of August, 2021.

/s/ Colleen T. Sipiorski
Colleen T. Sipiorski

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500 Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_21-224_M-21-224
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-224_M-21-224
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_21-224_M-21-224
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Joylyn C	Hoffman Malueg	Joylyn.hoffmanmalueg@wecenergygroup.com	Minnesota Energy Resources	2685 145th St W Rosemount, MN 55068	Electronic Service	Yes	OFF_SL_21-224_M-21-224
Brian	Meloy	brian.meloy@stinson.com	STINSON LLP	50 S 6th St Ste 2600 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-224_M-21-224
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-224_M-21-224
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_21-224_M-21-224
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_21-224_M-21-224
Elizabeth	Schmiesing	eschmiesing@winthrop.com	Winthrop & Weinstine, P.A.	225 South Sixth Street Suite 3500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-224_M-21-224

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Colleen	Sipiorski	Colleen.Sipiorski@wecenergygroup.com	Minnesota Energy Resources Corporation	700 North Adams St Green Bay, WI 54307	Electronic Service	Yes	OFF_SL_21-224_M-21-224
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	Yes	OFF_SL_21-224_M-21-224
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_21-224_M-21-224
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-224_M-21-224