



505 Nicollet Mall  
P.O. Box 59038  
Minneapolis, MN 55459-0038

July 6, 2015

Mr. Daniel Wolf, Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>TH</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

**RE: Reply Comments: Annual Automatic Adjustment Report –  
CenterPoint Energy; Docket No. G999/AA-14-580**

Dear Mr. Wolf:

CenterPoint Energy submits its reply comments to the response comments of the 2013-2014 Annual Automatic Adjustment Reports by the Minnesota Department of Commerce (Department or DOC) dated June 24, 2015 and the comments of the Office of the Attorney General (OAG) dated June 26, 2015.

If you have any questions regarding the information provided in this filing, please contact me at (612) 321-5078.

Sincerely,

/s/

Marie Doyle  
Rate Analyst

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
John Tuma	Commissioner
Betsy Wergin	Commissioner

Annual Automatic Adjustment Report and  
True Up Filing for 2013-2014

Reply Comments  
Dockets G999/AA-14-580  
and G-008/AA-14-752

CenterPoint Energy (“CPE” or “the Company”) submits to the Minnesota Public Utilities Commission (or “PUC”) these Reply Comments in response to the Department of Commerce’s (“Department” or “DOC”) June 24, 2015 Response Comments and the Office of the Attorney General’s (“OAG”) June 26, 2015 Comments on the Company’s 2013-2014 Annual Automatic Adjustment Report (“*AAA Report*”).

**Response to the Department of Commerce**

In its Response Comments, the DOC recommends that the Commission:

- A. Accept CenterPoint Energy’s FYE14 true up, Docket No. G008/AA-14-752; and
- B. Allow CenterPoint Energy to implement its true up as shown in Department Attachment G10 of the *AAA Report*.

CenterPoint Energy agrees with the recommendations to accept the FYE14 true up and to allow the Company to implement the true up as filed.

In addition, the DOC recommends several requirements for Minnesota gas utilities of which the following are applicable to CPE:

- C. Require CenterPoint Energy to continue to provide a post-mortem analysis of gas hedging in a format similar to that provided in this docket;
- D. Require CenterPoint Energy to total the gas costs in its Contractor Main Strikes Report and provide the allocation of the gas costs credited to each class in its true-up of commodity costs; and
- E. Require CenterPoint Energy to provide information on unauthorized gas use in the next three AAA Reports including, for each customer that did not comply with a requested interruption during the heating season:
  - a. The volume of gas consumed by the customer;
  - b. The commodity rate charged for unauthorized gas use and how the rate is determined;

- c. The financial penalty assessed by the Company including supporting calculations, if any; and
- d. A discussion about communication by the utility with the customer regarding non-compliance with interruption requests.

CenterPoint Energy agrees with these recommendations and specifically supports the DOC's recommendation about unauthorized gas use. The Company believes the recommendation will lead to increased understanding of the issues by all parties.

### **Response to the Office of the Attorney General**

In its Comments, the OAG:

- A. Argues that customers that fail to interrupt when requested compromise system reliability and shift costs onto firm customers;
- B. Discusses the measurement of curtailment compliance; and
- C. Requests that utilities' Reply Comments discuss "how they measure curtailment performance internally, and additional metrics that could be used to ensure that utilities' customer outreach and fees are effective at increasing customer compliance."

The Company will reply to each of these points in turn.

#### **A. System Reliability**

The OAG identifies three "problems" related to a failure of interruptible customers to interrupt gas usage when requested. These problems include: the possible impact on system reliability, the perceived inequity of receiving lower rates for interruptible service, but not interrupting; and a possible impact on future peak day forecasting.

CenterPoint Energy agrees that compliance with interruption requests is important for reliability and fairness reasons. On the reliability issue, we point out that compliance with interruption requests *by the class* of interruptible customers is important to ensure system reliability; however, in only the most unique circumstances would non-compliance *by an individual* interruptible customer, or even a number of small individual customers, jeopardize reliability.<sup>1</sup> This is true simply because the relative impact of non-compliant customers is quite small compared to total load and, in fact, is dwarfed by variability due to intra-day changes in weather. For example, a change in average temperature of just one degree equates to about 15,000 dekatherms ("dth") of firm customer load. This is about as large as the highest daily unauthorized use, in total, by non-compliant customers during the 2013/14 heating season. During a typical winter, the Company routinely manages weather-driven intra-day demand swings of five to ten times that amount or more while maintaining system reliability.

---

<sup>1</sup> Those unique circumstances are generally location-specific (e.g., a large interruptible customer on a relatively small segment of the distribution system with limited supply points) and are managed through a higher level of communication with the customer.

The OAG comments state that interruptible customers' failure to interrupt could inflate demand forecasts, increase pipeline entitlement levels and raise costs to firm customers. These claims are simply incorrect for CenterPoint Energy. The Company's design day demand forecast is based on the historical usage data of firm customers only. Usage by interruptible customers is not included in the data and therefore has no impact on the design day forecast, the level of pipeline entitlements obtained or the cost of such entitlements for firm customers.

The OAG comments also discuss how utilities can influence curtailment compliance through communication and penalties. The OAG interprets a DOC comment from a different docket about the appropriate level of penalty for non-compliance, but it's not clear to the Company whether the OAG recommends adoption of its interpretation or only provides it for informational purposes. In either case, the Company believes its tariffs provide appropriate mechanisms for cost recovery and compliance incentives for interruptible customers. The DOC has not recommended any changes to CenterPoint Energy's tariffs in this area.

## B. Measuring Curtailment Compliance

The OAG provides comments on the importance of measuring "curtailment compliance performance", discusses the limitations of using unauthorized gas use as a percentage of (daily or annual ) sales as a metric of performance, and concludes that the difference between actual and expected curtailment should be used as a metric. The Company disagrees on several points.

The OAG's comments appear to be based on the idea that if the actual curtailment amount is less than the expected curtailment amount, then system reliability may be compromised and the curtailment performance should be improved. The Company disagrees with this premise and believes it may be based on an incomplete understanding of how a curtailment event is managed. Even if the Commission were to accept the OAG's theoretical construct, it has several flaws that render it unworkable in practice.

For CenterPoint Energy, planning for the upcoming gas day includes a comparison of forecasted load and expected supplies. When forecasted load exceeds expected supplies, the difference must be obtained during the gas day through either reductions in load or increases in supplies or a combination of both. Reductions in load occur through warmer weather conditions, closures of schools or businesses, and curtailment. Increases in supplies occur through the addition of peak shaving gas or the additional use of storage withdrawals or swing supply contracts (if pipeline capacity is available intra-day). The Company uses all these tools to maintain system reliability during current and expected conditions while maintaining flexibility to respond to unforeseeable changes (e.g., mechanical failure on an interstate pipeline). The Company does not have a static "expected curtailment" quantity against which to measure performance.

Even if the Commission were to find some value in the OAG's theoretical approach, it is not practicable for at least two reasons. First, the actual curtailment is not measurable.

It is not possible to measure the amount of gas not used and therefore it can only be estimated. It is estimated after the fact by subtracting actual load from estimated load at the actual temperature. The OAG metric would then compare this estimate to the “expected curtailment amount”. As already explained, CPE does not have a static “expected curtailment amount”. Notwithstanding that fact, assuming the OAG obtained some proxy for “expected curtailment amount”, the OAG metric would be essentially the difference between what curtailment the Company thinks will be needed if the weather forecast is accurate with what curtailment the Company thinks happened with the actual weather. This difference reflects both the effect of the modeling equations at different temperatures as well as decreases in load due to curtailment and as such is not a measure of either forecasting or curtailment accuracy or curtailment compliance.

Second, the OAG metric does not consider intra-day changes that would affect the level of actual curtailment, but have nothing to do with compliance with curtailment requests. As already alluded to, changes in weather (e.g., temperature, wind speed, cloud cover, precipitation), gas supplies, pipeline limitations, peaking plant operations (i.e., LNG, propane-air or underground storage), and school or business closures are just some examples that can and do lead to intra-day changes in the amount of curtailment requested. The OAG’s recommended metric is a static measure of a dynamic event driven by several variables. The metric could not be reasonably used to measure compliance with curtailment requests.

The OAG has also either misunderstood or misinterpreted the data provided by CPE in response to Information Request OAG-002. The OAG comments state that CenterPoint Energy “estimated that during one of its curtailment events it received only 54% of the curtailment it expected to receive.” This is not an accurate statement—the Company made no such estimation. The Company merely provided the data shown on the attached Information Request response. Since the OAG did not provide the calculations it made that led to this inaccurate comment, CPE cannot be certain how the OAG came to its incorrect conclusion. However, it appears the OAG mistook “Estimated Curtailment” (column H) for “expected curtailment”. The OAG appears to have subtracted “Unauthorized Usage” (column I) to obtain “actual curtailment”. It appears the OAG then took the ratio of these numbers for January 24, 2014<sup>2</sup> and interpreted this as “54% of the curtailment it [CPE] expected to receive.” This calculation is fundamentally flawed because the “Estimated Curtailment” is an estimate of the curtailment that actually occurred and not a measure of expected curtailment. Consequently, the Company attaches no meaning to this ratio as a measure of curtailment compliance or curtailment or forecasting accuracy. For these reasons, the Company does not agree that the OAG metric would be an improved measure of curtailment compliance especially given the availability of a more direct measure, as discussed next.

---

<sup>2</sup> From Response to OAG-002, for January 24, 2014:  $(1800-819)/1800 = 54\%$ .

### C. CNP Curtailment Metrics

The Company evaluates compliance with curtailment requests by two primary, direct observations: did the customer who was curtailed have any unauthorized gas usage and, if so, was the amount material?

These questions are directly answerable from records of the customers who were contacted for interruption and the metered usage of those customers. Since the meters serving interruptible customers measure hourly flow, the Company can determine whether a customer complied with the curtailment request in a timely manner, an untimely manner, or not at all. In the event of customer non-compliance, the Company applies its tariffs and the appropriate penalties are charged for unauthorized gas usage.

The OAG requested that utilities identify additional metrics to ascertain whether customer outreach and fees are effective at increasing curtailment compliance. As discussed above, the Company agrees with the Department's recommended additional reporting.

As a final note, the OAG comments suggest that "it may be reasonable to begin allocating a portion of demand costs to [CPEs] interruptible class" if the Company believes curtailment compliance cannot or need not be improved. The Company has strong compliance from its interruptible customers as demonstrated by the low level of unauthorized gas usage. Further, any non-compliance to date has not jeopardized system reliability. Therefore the Company does not agree, and the OAG has certainly not shown, that additional demand costs should be allocated to interruptible customers. As the Commission is aware, a portion of demand costs related to interstate pipeline storage services are currently allocated to interruptible customers. In addition, a portion of the rate base cost of service associated with Company-owned peaking facilities is allocated to interruptible customers. This current treatment of costs is both fair and appropriate for all customers, interruptible and firm.

### Conclusion

In summary:

- CenterPoint Energy agrees with the recommendations of the DOC.
- CenterPoint Energy does not agree with the comments and recommendations of the OAG.

CenterPoint Energy believes that its existing tariff language and business processes effectively manage curtailment and unauthorized gas use and no further action is necessary at this time.



505 Nicollet Mall  
PO Box 59038  
Minneapolis, MN 55459-0038

June 19, 2015

Mr. John Lindell  
MN Office of the Attorney General  
1400 Bremer Tower  
St. Paul, Minnesota 55101-2131

**Information Request Response(s): OAG No. 2 and 3 –  
Dockets G-999/AA-14-580 and G-008/AA-14-752**

Dear Mr. Lindell:

Enclosed are CenterPoint Energy's responses to the Office of the Attorney General's Information Requests 2-3 in Docket No. G-999/AA-14-580.

CenterPoint Energy has Emailed its responses in PDF format as requested.

Herein, CenterPoint Energy is:

- Mailing paper copies to John Lindell as requested.

If you have any questions or require additional information, please contact me at (612) 321-5078.

Sincerely,  
/s/  
Marie M. Doyle  
Rates Analyst  
Attachments

**Office of the Attorney General**  
UTILITY INFORMATION REQUEST

DOCKET NO. G-999/AA-14-580

**CenterPoint Energy Response**

Requested By: Ryan Barlow

---

Date Received: June 9, 2015

---

Response Date: June 19, 2015

---

Respondent/s Name: Marie M. Doyle / John Heer / Tim Olson

---

Respondent/s Title, Department: Sr. Rates Analyst, Regulatory Services

---

Confidential: No

---

---

**REQUEST NO.:** OAG - 002

Reference: Interruption over report period

For each interruption period provide the number of therms the company *expected* to interrupt and the number *actually* interrupted. Explain, in laymen's terms, the method used for calculating the expected and actual number of therms interrupted and provide the detailed calculation in a live Excel spreadsheet. In addition, provide the total number of therms consumed over each interruption period. If interruption periods span more than one day, provide an additional break out by day for each of the questions above.

**RESPONSE:**

CenterPoint Energy ("CNP") has records of the forecasted daily load and the planned supplies to meet the expected load as of a specific point in time before the beginning of the gas day. When expected load exceeds planned supplies, the difference is planned to be met through curtailment from sales service or through additional peak shaving resources. It is important to note that the load and supplies can change throughout the gas day during a curtailment event as weather conditions, gas supplies, and customer loads change.

CNP also has records of the estimated curtailment that did occur calculated as the difference between the actual load and the estimated load at actual conditions. This difference is an approximation of the curtailment that occurred. The estimated load is calculated by inputting actual experienced temperature into the load curve equations.

CNP is compiling this information for the requested interruption periods and will provide it when it is available.



CNP assumes the request to provide “the total number of therms consumed over each interruption period” to be a request for the amount of unauthorized gas used by curtailed customers during each curtailment period. That information has been previously provided in DOC-018 in the present docket and provided to the OAG on June 4, 2015.

For additional context, a general description of CNP’s curtailment process is provided below.

CenterPoint Energy approaches each period of curtailment based on the unique set of circumstances presented at the time of the curtailment decision. Based on forecasted conditions and corresponding projected gas load, the Gas Control department consults with the Engineering and Gas Supply departments to assess the need for and extent of curtailment required. The estimated curtailment required may include a variety of factors, such as quantity, locations, possible durations, supply constraints, delivery system constraints and other relevant factors. Using the developed requirements, CNP will sort its interruptible customer database as needed and identify customers for curtailment.

In a typical supply curtailment (e.g., curtailment of system supply customers because the pipeline entitlement usage is at capacity), a customer database is sorted for customers on system supply, and then arranged in order of increasing margin. The database has an associated value for the customers’ past peak daily energy usage. CNP will use these peak day values as adjusted for the actual forecasted conditions and other relevant factors to accumulate enough natural gas energy to curtail, with a conservative contingency amount included, to balance the available system supply with forecasted usage. The customers are then contacted to curtail their gas use. During a curtailment event, CNP continues to assess the evolving conditions on its system as actual weather can, and often does, deviate from forecasted weather. If the weather warms from the forecast and system supply is available, some customers will be released from the curtailment. If the weather turns colder than forecasted, additional customers may be curtailed. CNP’s focus during a supply curtailment is not with exactly how much load was curtailed but with balancing of available supply with actual customer demand.

In an operational or distribution system constraint curtailment, the decisions are typically geographical, limited to an area of low pressure on the distribution system. In these cases, the customer data base is sorted by location and margin and considering the forecasted or actual weather and expected loads, decisions are made on the extent of curtailment required. These operational curtailments may involve just a few customers and may only be for a few hours during peak system demand periods. During operational curtailments, CNP’s overriding objective is to maintain system reliability by focusing on maintaining sufficient pressure during the curtailment.

Curtailment situations are dynamic; decisions are made based on then-current data and modified as the actual situation changes. Our curtailment management is a look-forward philosophy with our goal to efficiently manage system supply and distribution reliability.

**From:** Doyle, Marie M.  
**To:** ["Donnelly, Deanna"](#)  
**Cc:** ["Barlow, Ryan"](#); ["Canaday, James"](#); ["Dobson, Ian"](#); ["Meyer, Joseph"](#); ["Lee, Shoua"](#); ["Lindell, John"](#); ["Nelson, Ron"](#); ["Sigal, Judy"](#); ["Wichmann, Andrea"](#); ["Sorum, Peggy J."](#); ["Bjorklund, Brenda A."](#)  
**Subject:** RE: In the Matter of the Review of 2013-2014 Annual Automatic Adjustment Reports - Docket No. G999/AA-14-580  
**Date:** Wednesday, June 24, 2015 2:22:00 PM  
**Attachments:** [Load Forecast - Supply - Curtailment 2013 - 2014.xlsx](#)

---

The attached file contains the additional information referred to in the Company's response on Friday, June 19, 2015 in OAG 002 for Docket G-999/AA-14-580 related to curtailment during the winter of 2013-2014.

Marie Doyle  
Regulatory Services – CenterPoint Energy  
612-321-5078

---

**From:** Doyle, Marie M.  
**Sent:** Friday, June 19, 2015 3:38 PM  
**To:** 'Donnelly, Deanna'  
**Cc:** Barlow, Ryan; Canaday, James; Dobson, Ian; Meyer, Joseph; Lee, Shoua; Lindell, John; Nelson, Ron; Sigal, Judy; Wichmann, Andrea; Sorum, Peggy J.; Bjorklund, Brenda A.  
**Subject:** RE: In the Matter of the Review of 2013-2014 Annual Automatic Adjustment Reports - Docket No. G999/AA-14-580

Enclosed are CenterPoint Energy's responses to Information Requests 2 and 3, as requested.

Paper copy requested will be mailed today.

Marie Doyle  
612-321-5078

---

**From:** Donnelly, Deanna [<mailto:Deanna.Donnelly@ag.state.mn.us>]  
**Sent:** Tuesday, June 09, 2015 3:05 PM  
**To:** Doyle, Marie M.  
**Cc:** Barlow, Ryan; Canaday, James; Dobson, Ian; Meyer, Joseph; Lee, Shoua; Lindell, John; Nelson, Ron; Sigal, Judy; Wichmann, Andrea  
**Subject:** In the Matter of the Review of 2013-2014 Annual Automatic Adjustment Reports - Docket No. G999/AA-14-580

Enclosed and served upon you please find the Office of the Attorney General – Residential Utilities and Antitrust Division's – Request numbers 2 and 3, in the above-entitled matter. I have also enclosed a Microsoft Word version of the Information Requests for your convenience.

*Deanna Donnelly*  
*Legal Secretary*  
*Office of the Minnesota Attorney General*  
*Residential Utilities and Antitrust Division*

445 Minnesota Street, Suite 1400  
St. Paul, MN 55101  
Telephone: (651) 757-1258  
[Deanna.Donnelly@ag.state.mn.us](mailto:Deanna.Donnelly@ag.state.mn.us)

---

This e-mail is intended to be read only by the intended recipient. This e-mail may be legally privileged or protected from disclosure by law. If you are not the intended recipient, any dissemination of this e-mail or any attachments is strictly prohibited, and you should refrain from reading this e-mail or examining any attachments. If you received this e-mail in error, please notify the sender immediately and delete this e-mail and any attachments. Thank you.

---

\*\*\*\*\* This email is from an external sender outside of the CenterPoint Energy network. Be cautious about clicking links or opening attachments from unknown sources. \*\*\*\*\*

---

## IR OAG 002 -

Gas Day	Day of week	Day and Time of Load Forecast	Load Forecast (DT)	Available Supplies at time of Forecast (DT)	Difference of Forecast to Supply (DT)	Actual Load at the End of Gas Day (DT)	Estimated Curtailment on during Gas Day (DT)	Unauthorized Usage on Gas Day (DT)
A	B	C	D	E	F	G	H	I
12/11/2013	Wed	12/10/13 7:00 AM	1,225,000	1,227,000	2,000	1,223,844	5,500	33
12/29/2013	Sun	12/27/13 7:00 AM	1,232,000	1,082,000	-150,000	1,190,488	54,000	1,233
12/30/2013	Mon	12/27/13 7:00 AM	1,230,000	1,086,000	-144,000	1,259,832	48,000	27
1/5/2014	Sun	1/3/14 7:00 AM	1,496,000	1,230,000	-266,000	1,296,121	135,000	17,388
1/6/2014	Mon	1/3/14 7:00 AM	1,501,000	1,230,000	-271,000	1,353,160	145,000	15,875
1/7/2014	Tue	1/6/14 7:00 AM	1,322,000	1,275,000	-47,000	1,220,478	85,000	3,700
1/8/2014	Wed	1/7/14 7:00 AM	1,235,000	1,258,000	23,000	1,241,697	40,000	17
1/22/2014	Wed	1/21/14 7:00 AM	1,221,000	1,147,000	-74,000	1,250,023	30,000	1,079
1/23/2014	Thu	1/22/14 7:00 AM	1,257,000	1,181,000	-76,000	1,186,010	30,000	720
1/24/2014	Fri	1/23/14 7:00 AM	950,000	985,000	35,000	844,013	1,800	819
1/26/2014	Sun	1/24/14 7:00 AM	1,170,000	1,128,000	-42,000	1,062,640	100,000	5,755
1/27/2014	Mon	1/24/14 7:00 AM	1,352,000	1,178,000	-174,000	1,198,764	115,000	10,556
1/28/2014	Tue	1/27/14 7:00 AM	1,220,000	1,178,000	-42,000	1,146,764	60,000	1,345
1/29/2014	Wed	1/28/14 7:00 AM	920,000	921,000	1,000	844,115	44,000	0
2/7/2014	Fri	2/6/14 7:00 AM	960,000	967,000	7,000	1,049,958	7,000	0
2/8/2014	Sat	2/7/14 7:00 AM	1,030,000	1,038,000	8,000	1,004,776	20	0
2/9/2014	Sun	2/7/14 7:00 AM	1,120,000	1,143,000	23,000	1,111,617	2,100	0
3/1/2014	Sat	2/28/14 7:00 AM	1,098,000	1,099,000	1,000	1,096,726	65,000	5,212
3/2/2014	Sun	2/28/14 7:00 AM	1,162,000	1,142,000	-20,000	1,106,589	100,000	6,038

## Notes to columns above:

In addition to the curtailment events listed above (where the load forecast was over 900,000 and curtailment calls were made) there were some smaller curtailment events that were done for operational purposes.

- D Is the estimated load forecast before the beginning of the gas day, it is important to note that load can change throughout the gas day as weather conditions, gas supplies, and customer loads change.
- E Is the available supplies before the beginning of the gas day, it is important to note that supplies can change throughout the gas day as weather conditions, gas supplies, and customer loads change.
- F Is the difference between column D and E and represents the estimated difference planned to be met through curtailment from sales service or through additional peak shaving resources, this difference can change throughout the gas day as weather conditions, gas supplies, and customer loads change.
- G Is the actual load as measured at the end of the day
- H Is the approximation of curtailment that is calculated as the difference between the actual load and the estimated load at actual conditions.

**AFFIDAVIT OF SERVICE**  
**G999/AA-14-580**

STATE OF MINNESOTA)  
  ) ss.  
COUNTY OF HENNEPIN)

Marie Doyle, being first duly sworn on oath, deposes and says she served or caused to be served on behalf of CenterPoint Energy reply comments in the above docket upon:

- the Minnesota Public Utilities Commission;
- the Department of Commerce;
- the Minnesota Office of the Attorney General; and
- Electronic filing of its Annual Automatic Adjustment Report on persons requesting electronic service on the enclosed service list,
- and on persons requesting paper service on the enclosed service list, by delivering by hand at the respective addresses on the list or by placing in the U.S. Mail at the City of Minneapolis.

\_\_\_\_\_  
*/s/*  
Marie Doyle, Rate Analyst  
Regulatory Services  
CenterPoint Energy

Subscribed and sworn to before me  
this 6th Day of July, 2015

\_\_\_\_\_  
*/s/*  
Kathleen M Simonson  
My Commission 1/31/2017

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tamie A.	Aberle	tamie.aberle@mdu.com	Great Plains Natural Gas Co.	400 North Fourth Street  Bismarck, ND 585014092	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.	202 S. Main Street  Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-580_G999-AA-14-580
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Michael	Greiveldinger	michaelgreiveldinger@alliantenergy.com	Interstate Power and Light Company	4902 N. Biltmore Lane  Madison, WI 53718	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc.	202 South Main Street P.O. Box 68 Le Sueur, MN 56058	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Amber	Lee	ASLee@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	2665 145th Street West  Rosemount, MN 55068	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
Paul J.	Lehman	paul.lehman@xcelenergy.com	Xcel Energy	414 Nicollet Mall  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_14-580_G999-AA-14-580
Regulatory	Records	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_14-580_G999-AA-14-580

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_14-580_G999- AA-14-580