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August 4, 2014

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
Metro Square – Suite 350  
212 7<sup>th</sup> Place East  
St. Paul, MN 55101-2147

Re: Responses to Questions of the Office of the Attorney General – Antitrust and Utilities Division

In the Matter of a Request for Approval of the Asset Purchase & Sale Agreement Between Interstate Power and Light Company and Minnesota Energy Resources Corporation, Docket No. G001,G011/PA-14-107

Dear Dr. Haar:

Enclosed for filing with the Minnesota Public Utilities Commission (“Commission”), please find Interstate Power and Light Company (“IPL”) and Minnesota Energy Resources Corporation’s (“MERC”) Responses to the Questions of the Office of the Attorney General – Antitrust and Utilities Division (“OAG”) dated July 7, 2014. Attachments A, B, and C are also being submitted in MS Excel format.

Copies of this filing have been served on the Minnesota Department of Commerce, Division of Energy Resources, the Office of the Attorney General-Antitrust & Utilities Division, and the attached service list.

Please contact me at (612) 340-2881 if there are any questions regarding this filing.

Sincerely yours,

/s/ Michael J. Ahern

Michael J. Ahern

Enclosures

cc: Service List

**STATE OF MINNESOTA**

**BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**Beverly Jones Heydinger  
David C. Boyd  
Nancy Lange  
Dan Lipschultz  
Betsy Wergin**

**Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner**

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**IN THE MATTER OF A REQUEST FOR  
APPROVAL OF THE ASSET  
PURCHASE AND SALE AGREEMENT  
BETWEEN INTERSTATE POWER  
AND LIGHT COMPANY AND  
MINNESOTA ENERGY RESOURCES  
CORPORATION**

**DOCKET NO. G001,G011/PA-14-107**

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**RESPONSE TO COMMISSION ADDITIONAL QUESTIONS FOR JOINT  
PETITIONERS**

On June 30, 2014, the Minnesota Public Utilities Commission (the Commission) issued an Order Requiring Additional Record Development in this docket. The Order required that Interstate Power and Light Company (IPL) and Minnesota Energy Resources Corporation (MERC) (collectively Joint Petitioners) file comments responding to any additional questions posed by the Commission, the Minnesota Department of Commerce, Division of Energy Resources (the Department), the Minnesota Office of the Attorney General – Antitrust and Utilities Division (the OAG), or any other interested person.

On July 7, 2014, the OAG submitted Additional Questions for Joint Petitioners. Joint Petitioners submit these comments (Comments) in response to those Additional Questions.

**1. Calculate new rates for all classes of IPL customers based upon IPL's current costs of providing service. Produce all financial information necessary to substantiate the new rates.**

IPL has calculated new rates for its current classes of customers using a preliminary estimate of revenue requirements based on a 2013 historical test year using actual financial results with pro-forma adjustments for former manufactured gas plant (FMGP) costs, rate case expenses, and weather normalization for the IPL-Minnesota Gas jurisdiction. IPL does not currently have information available to calculate revenue requirements for the IPL-Minnesota Gas jurisdiction for a 2014 projected test year or the information necessary to perform a class cost of service study.

Attachment A to these Comments provides the calculation of the new therm charges using the 2013 historical revenue requirements with pro-forma adjustments and assuming a return on equity of 9.70 percent.<sup>1</sup> Attachment A also provides supporting financial information for the calculation of these rates, including an overall financial summary, income statement and revenue requirements, rate base calculation, and cost of capital structure used to determine the new therm charges. IPL has not calculated the travel and entertainment expense as that is typically required only for a rate case. However, IPL would not expect that data to materially affect its revenue requirement analysis.

**2. Based upon the information provided in response to question one, provide an alternate rate for IPL customers after removing the deferred tax assets.**

Joint Petitioners have addressed this request in their Reply Comments filed May 9, 2014, at pp. 27-32. In addition, the Department has agreed with Joint Petitioners'

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<sup>1</sup> The calculations and data in Attachment A were previously provided in response to Department of Commerce Information Request No. 5. These responses were also previously provided to the OAG in response to OAG Information Request Number 100.

position that no adjustments should be made to the proposed sale of assets on account of deferred taxes. See Supplemental Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources, filed June 12, 2014, at pp. 8-9.

Attachment B to these Comments provides the calculation of the new therm charges provided in response to Question 1 above, with the accumulated deferred taxes removed from rate base.<sup>2</sup> However, the OAG's recommendation to create a direct refund of IPL's deferred taxes in future rates would likely violate the tax normalization rules resulting in the loss of MERC's ability to claim accelerated tax depreciation in the future. This would result in significant detriment to MERC ratepayers.

Additionally, offsetting the tax consequence of the sale (i.e., IPL's having to recognize and pay its deferred tax liabilities), MERC will be allowed an offsetting step up in the tax basis of the acquired assets, and will be allowed to restart tax depreciation on the total tax basis in acquired assets. Beginning in the year of sale, MERC will be entitled to greater accelerated tax depreciation deductions than IPL would have otherwise been entitled to apply. This will result in MERC rebuilding the balance of deferred taxes associated to the acquired assets in future years. Therefore, the impact on customers of resetting deferred taxes is temporary, and the present value to customers that would be associated with the reset of deferred taxes and rate base in the year of sale would be significantly less than the IPL's current balance of deferred tax of approximately \$2.7 million.

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<sup>2</sup> The amount of accumulated deferred taxes for IPL's utility assets allocated to Minnesota Gas customers is approximately \$2,561,347. See IPL Response to Department of Commerce Information Request No. 5, included as Attachment D to these Comments.

- 3. Calculate new rates for all classes of MERC's customers. In performing the calculations, assume that IPL's customers have been integrated into MERC's system and account for any IPL assets that would be acquired in the proposed transaction. Provide all financial information necessary to substantiate the new rate.**

Attachment C to these Comments provides an update to MERC's revenue deficiency and overall rate increase as proposed in MERC's rebuttal position in MERC's current rate case, Docket No. G-011/GR-13-617, based on IPL's operating expenses and rate base. MERC's rebuttal position revenue deficiency is \$12,159,454. The revenue deficiency including IPL's operating expenses and rate base is \$13,148,338. It should be noted that this is a simplified analysis of hypothetical new rates based on available information. This calculation also removes the accumulated deferred taxes from rate base, as IPL will have to pay these deferred taxes to the applicable taxing authorities in the year of the sale, resetting the deferred tax balance.<sup>3</sup>

The overall proposed final rate increase in MERC's pending rate case, based on MERC's rebuttal position, is 4.08%. The overall increase with incorporation of IPL customers, based on incorporation of IPL's operating expenses and rate base, would be 4.23%.<sup>4</sup> Under this analysis, if IPL customers are transitioned to MERC's proposed final rates upon approval of the proposed Transaction, MERC would under-recover in the amount of \$466,048.

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<sup>3</sup> The amount of accumulated deferred taxes for IPL's utility assets allocated to Minnesota Gas customers is approximately \$2,561,347. See IPL Response to Department of Commerce Information Request No. 5, included as Attachment D to these Comments.

<sup>4</sup> The analysis for incorporation of IPL into MERC's proposed final rates is based on available information regarding IPL's operating expenses and rate base.

**4. Separately identify any and all differences between the rates calculated in questions one, two, and three. Specifically describe the reason for each difference.**

Below and attached to these Comments as Attachment E is a comparison of the rates calculated in response to Questions 1, 2, and 3 above. Question 1 provides a calculation of updated rates for IPL, Question 2 provides a calculation of alternative rates after removing deferred taxes from rate base, and Question 3 provides a calculation of MERC rates with IPL rate base and operating expenses. See the responses to Questions 1, 2, and 3 above for additional details regarding these calculations.

	Response to OAG Question 1		Response to OAG Question 2		Response to OAG Question 3	
	Customer	Distribution	Customer	Distribution	Customer	Distribution
	Charge	Charge	Charge	Charge	Charge	Charge
Residential	\$ 5.00	0.26524	\$ 5.00	0.28802	\$ 9.50	0.23560
Commercial	\$ 5.00	0.26524	\$ 5.00	0.28802	\$ 18.00	0.20141
Interruptible	\$ 14.00	0.06199	\$ 14.00	0.06731	\$ 165.00	0.09082
Transport	\$ 200.00	0.06197	\$ 200.00	0.06730	\$ 275.00	0.09082
*The rates used for MERC rates is MERC's rebuttal position for Residential, General Service Small C&I, Small Volume Interruptible, and Small Volume Interruptible Transport.						

**5. Provide the following information in regards to former manufactured gas plant remediation:**

- a. Identify the Commission's legal authority concerning former manufactured gas plant remediation that is performed by IPL if IPL no longer a public utility. Specifically, identify the Commission's regulatory authority in the event that IPL fails to properly remediate the FMGP sites at Albert Lea, Fairmont, and Owatonna; additionally, identify the Commission's regulatory authority to oversee remediation performed by IPL.**

The Minnesota Pollution Control Agency (MPCA), not the Commission, has authority with respect to remediation of the FMGP sites, including enforcement authority in the event IPL fails to properly remediate the FMGP sites at Albert Lea, Fairmont, New

Ulm, Owatonna, or Rochester. The MPCA will continue to have authority over the FMGP remediation performed by IPL when IPL is no longer a Minnesota public utility.

Any future cleanup and related costs for the Minnesota FMGP sites other than the Austin FMGP site will remain the responsibility of IPL. The MPCA will continue to have authority over the remediation efforts and required remediation measures at those sites. All possible investigation and remediation activities have been completed for all sites other than the Austin site. New Ulm, Albert Lea, and Owatonna are expected to receive site closure from the MPCA in 2014, 2015, and 2016, respectively. Rochester and Fairmont have already received site closure from the MPCA.

**b. Describe how the Petitioners will comply with the Commission's FMGP reporting requirements for those FMGP remediation costs that would not be transferred to MERC under the proposal.**

IPL will continue to meet its reporting requirements under Docket No. G-001/M-06-1166 until the Transaction is approved and closes or until ordered otherwise by the Commission. MERC intends to submit annual filings upon approval of the Transaction to account for MERC's spending at the Austin site, assuming such filings would be helpful to the Commission. Upon the initiation of MERC's next rate case, MERC would agree to continue to submit annual compliance filings to account for annual expenditures and recovery from ratepayers. With respect to the non-Austin sites, which are not being transferred to MERC, MERC would continue to include, in its annual reports, the amount of the Regulatory Asset acquired from IPL (which represents the amount of pre-closing FMGP costs not yet recovered). With respect to future remediation costs at the non-Austin FMGP sites, there will be nothing to report because the additional expenditures at these sites will be the responsibility of IPL and will not be deferred for recovery from ratepayers.

**6. Identify the amount of deferred tax assets that have been paid by each customer class in IPL's system that would be lost under the proposed transaction.**

IPL's total deferred tax assets are \$2,355,756 as of December 31, 2013. Details of all deferred taxes including liabilities were provided in IPL's response to OAG Information Request No. 108.<sup>5</sup> Deferred taxes are not tracked by customer class.

Customers pay taxes based on regulatory income and expenses multiplied by the statutory tax rate. If these same taxes are not paid or received from the government in the current year due to tax laws, they become deferred tax liabilities or assets, respectively.

Deferred tax liabilities decrease rate base until the taxes are paid back to the government. This reduction in rate base is due to the fact that the utility was not required to pay taxes and, therefore, had that money available from the government at a zero percent interest rate. This money is used to partially fund the business and, therefore, customers do not pay a return on the portion of the rate base funded by deferred tax liabilities.

Deferred tax assets occur when the government owes the utility money from net operating losses or other items where the regulatory expense was more than the tax expense. Certain deferred tax assets increase rate base since the utility has not received the cash from the government for certain expenses.

Once the sale transaction occurs, the deferred tax assets and liabilities will be settled with the government and, therefore, will have no further impact on rates, since

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<sup>5</sup> Included as Attachment F to these Comments.



the amount paid to the government would be consistent with the regulatory tax expense.

**7. Indicate the attendance at all public hearings in IPL's last three natural gas rate cases. In addition, indicate the attendance at all public hearings in IPL's last three electric rate cases. Further, indicate the number of attendees for any public hearings that have been held for any other PUC Docket in the last fifteen years.**

IPL assumes these questions refer to Commission-sponsored public hearings relating to IPL. IPL does not have any specific attendance information in its records related to the public hearings held in its last three natural gas or electric rate case dockets. (Please note that IPL's last natural gas rate case was held in 1996.) However, in its last electric rate case docket (Docket No. E001/GR-10-276), IPL estimates that there were approximately 200 individuals at the Albert Lea public hearing and less than 20 at each of the other two public hearings held in Winnebago and Stewartville.<sup>6</sup>

IPL does not have any records indicating attendance at any other IPL public hearings held in the last 15 years, nor does IPL recall any public hearings held that would meet these criteria in the last 5 to 10 years.

Dated this 4th day of August, 2014.

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<sup>6</sup> According to the Commission's Findings of Fact, Conclusions, and Order in that proceeding, some 271 members of the public attended the public hearings. See *In the Matter of the Application of Interstate Power and Light Company for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E-001/GR-10-276, Findings of Fact, Conclusions, and Order (August 12, 2011).



Minnesota Energy Resources Corporation

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Attachment A

IPL-Minnesota WN Gas Sales  
Sales by Rate

Estimated WN Calendar Sales by Rate (Allocated from Rev Class)

Rate	Rev Class	therms	Average Customers	Current therm Charge (less fuel)	Current Cust. Chrg.	Current Therm Rev.	Cur. Cust. Chrg. Rev.	Current Margin Rev.	Revenue with Increase	Adjusted therm Charge
10 Heating	RESIDENTIAL	8,427,357	9,431	0.19769	\$ 5.00	1,666,004	565,835	2,231,839	2,801,141	0.26524
10 Regular	RESIDENTIAL	52,721		0.19769		10,423	-	10,423	13,984	0.26524
10 Regular	COMMERCIAL	221,598	1,197	0.19769	\$ 5.00	43,808	71,805	115,613	130,583	0.26524
10 Heating	COMMERCIAL	4,189,961		0.19769		828,313	-	828,313	1,111,362	0.26524
20 Interruptible	COMMERCIAL	2,148,539	39	0.04620	\$ 14.00	99,263	6,552	105,815	139,734	0.06199
10 Regular	INDUSTRIAL	187,020	10	0.19769	\$ 5.00	36,972	600	37,572	50,206	0.26524
20 Interruptible	INDUSTRIAL	1,549,111	8	0.04620	\$ 14.00	71,569	1,344	72,913	97,369	0.06199
60 Interruptible	Transport	1,834,070	2	0.04619	\$ 200.00	84,716	4,800	89,516	118,464	0.06197
<b>Total</b>		<b>18,610,378</b>	<b>10,686</b>			<b>2,841,067</b>	<b>650,936</b>	<b>3,492,003</b>	<b>4,462,844</b>	
<b>10</b>		<b>13,078,657</b>	<b>10,637</b>	<b>0.19769</b>	<b>\$ 5.00</b>	<b>2,585,520</b>	<b>638,240</b>	<b>3,223,760</b>	<b>4,107,276</b>	<b>0.26524</b>
<b>20</b>		<b>3,697,650</b>	<b>47</b>	<b>0.04620</b>	<b>\$ 14.00</b>	<b>170,831</b>	<b>7,896</b>	<b>178,727</b>	<b>237,103</b>	<b>0.06199</b>
<b>60</b>		<b>1,834,070</b>	<b>2</b>	<b>0.04619</b>	<b>\$ 200.00</b>	<b>84,716</b>	<b>4,800</b>	<b>89,516</b>	<b>118,464</b>	<b>0.06197</b>
<b>Total</b>		<b>18,610,378</b>	<b>10,686</b>			<b>2,841,067</b>	<b>650,936</b>	<b>3,492,003</b>	<b>4,462,844</b>	

IPL Margin Revenue

Increase \$ 970,841  
Per Therm Increase % 34%

**INTERSTATE POWER & LIGHT COMPANY  
OVERALL FINANCIAL SUMMARY  
MINNESOTA GAS RETAIL JURISDICTION**

Line	Description	(a) Reference to Supporting Schedule	(b) Actual Unadjusted 2013 Calendar Year	(d) Proposed Test Year 2013
1	Revenue	A	\$ 12,672,959	\$ 12,648,724
2	Rate Base	C	\$ 8,244,663	\$ 8,244,663
3	Operating Income	A	\$ 286,500	\$ 48,569
4	Overall Rate of Return (3 divided by 2)		3.475%	0.589%
5	Rate of Return Requested	E	8.970%	8.970%
6	Required Net Operating Income (2 x 5)		\$ 739,546	\$ 739,546
7	Income Deficiency (6 - 3)		\$ 453,047	\$ 690,978
8	Gross Revenue Conversion Factor	A	1.705611	1.705611
9	Revenue Increase Requested (7 x 8)		\$ 772,722	\$ 1,178,540

INTERSTATE POWER AND LIGHT COMPANY

MINNESOTA GAS UTILITY

COST OF SERVICE

YEAR ENDED DECEMBER 31, 2013

Line No.	Description	(a) Actual Test Year Results	(b) Adjustments	(c) Adjusted Test Year Results	(d) Additional Revenues Required to Yield 8.970%	(e) Total Revenues Required to Yield 8.970%
					9.3%	
1	<b>Operating revenues</b>	\$ 12,672,959	\$ (24,235)	\$ 12,648,724	\$ 1,178,539	\$ 13,827,263
	<b>Operating expenses:</b>					
2	Gas purchased for resale	8,589,063	-	8,589,063		8,589,063
3	Operation expenses	2,731,204	381,583	3,112,787		3,112,787
4	Maintenance expenses	133,982	-	133,982		133,982
5	Depreciation and amortization	791,434	-	791,434		791,434
6	Property taxes	149,277	-	149,277		149,277
7	Miscellaneous taxes	50,312	-	50,312		50,312
	Income taxes -					
8	Current federal	(128,563)	(128,117)	(256,680)	372,065	115,385
9	Current state	(6,692)	(39,770)	(46,462)	115,497	69,035
10	Deferred	77,693	-	77,693		77,693
11	Investment tax credits	(1,251)	-	(1,251)		(1,251)
12	<b>Total operating expenses</b>	<b>12,386,459</b>	<b>213,696</b>	<b>12,600,155</b>	<b>487,562</b>	<b>13,087,717</b>
13	<b>Operating income</b>	<b>286,500</b>	<b>(237,931)</b>	<b>48,569</b>	<b>690,977</b>	<b>739,546</b>
14	<b>Rate base</b>	<b>8,244,663</b>	<b>-</b>	<b>8,244,663</b>		<b>8,244,663</b>
15	<b>Cost of Capital:</b>	<b>3.475%</b>		<b>0.589%</b>		<b>8.970%</b>

INTERSTATE POWER AND LIGHT COMPANY

MINNESOTA GAS UTILITY

SUMMARY OF ADJUSTMENTS TO COST OF SERVICE

YEAR ENDED DECEMBER 31, 2013

	(a)	(b)	(c)	(d)	(e)	(ad)	(ae)	
	Schedule:	B-1	B-2	B-3	B-4	B-5	B-50	
	Exhibit Designation:							
Line No.	Brief Description of Adjustment:	2013 Weather Normalization	FMGP Amortized over 10 Years	Rate Case Expenses Amortized over 3 Years	Intentionally Left Blank	Intentionally Left Blank	Intentionally Left Blank	Total
1	<b>Operating Revenues</b>	(\$24,235)						\$ (24,235)
	<b>Operating Expenses:</b>							
2	Gas Purchased for Resale							0
3	Operation Expense		\$ 181,583	\$ 200,000				381,583
4	Maintenance Expense							0
5	Depreciation and Amortization							0
6	Property Taxes							0
7	Miscellaneous Taxes							0
	Income Taxes-							
8	Current Federal at 31.57%	(7,651)	(57,326)	(63,140)	-	-		(128,117)
9	Current State at 9.80%	(2,375)	(17,795)	(19,600)	-	-		(39,770)
10	Deferred							0
11	Investment Tax Credit							0
12	Total Operating Expense	# (10,026)	106,462	117,260	-	-	-	213,696
13	<b>Operating Income</b>	# (14,209)	(106,462)	(117,260)	-	-	-	(237,931)
14	Rate Base Schedule							
15	for Compound Adjustments:							



INTERSTATE POWER AND LIGHT COMPANY

MINNESOTA GAS UTILITY

YEAR-END  
RATE BASE

YEAR ENDED DECEMBER 31, 2013

Line No.	Description	(a) Schedule Reference	(b) Year End	(c) Adjustments	(d) Adjusted Rate Base
<b>Investment in plant:</b>					
1	Utility plant in service	C-1, C-2	9,828,826 \$	-	\$ 9,828,826
2	Accumulated deferred income taxes	C-3	(2,561,289)	-	(2,561,289)
3	Customer advances for construction	C-4	(52,729)	-	(52,729)
4	Customer deposits	C-5	(77,871)	-	(77,871)
5	Unclaimed property	C-6	-	-	-
6	Accumulated provision for uncollectibles	C-7	(76,763)	-	(76,763)
	Accrued liability for property insurance, workers compensation insurance and injuries and damages				
7		C-8	(46,833)	-	(46,833)
8	Accrued vacation	C-9	(43,939)	-	(43,939)
9	Accrued pension plan obligations	C-10	(57,741)	-	(57,741)
10	<u>Total net investment in plant</u>		<u>6,911,661</u>	<u>-</u>	<u>6,911,661</u>
<b>Working capital:</b>					
11	Materials and supplies inventory	C-11	39,756	-	39,756
12	Prepayments	C-12	1,293,247	-	1,293,247
13	Propane inventory	C-13	-	-	-
14	Cash working capital requirements	C-14	-	-	-
15	<u>Total net working capital</u>		<u>1,333,003</u>	<u>-</u>	<u>1,333,003</u>
16	<b>Total rate base</b>		<b>8,244,663</b>	<b>- \$</b>	<b>8,244,663</b>

INTERSTATE POWER AND LIGHT COMPANY  
 MINNESOTA GAS UTILITY  
 SUMMARY OF ADJUSTMENTS TO THE RATE BASE  
 YEAR ENDED DECEMBER 31, 2013

Line No.	Schedule: Exhibit Designation: Brief Description of Adjustment:	(a)	(b)	(c)	(d)	(e)	(i)	(j)
		D-1	D-2	D-3	D-4	D-5	D-10	Total
		Intentionally Left Blank	Intentionally Left Blank	Intentionally Left Blank	Intentionally Left Blank	Intentionally Left Blank	Intentionally Left Blank	
<b>Investment in plant:</b>								
1	Utility plant in service						\$	-
2	Accumulated provision for depreciation and amortization							-
3	Accumulated deferred income taxes							-
4	Customer advances for construction							-
5	Customer deposits							-
6	Unclaimed property							-
7	Accumulated provision for uncollectibles							-
8	Accrued liability for property insurance, workers compensation insurance and injuries and damages							-
9	Accrued vacation							-
10	Accrued pension plan obligations							-
11	<b>Total net investment in plant</b>	-	-	-	-	-	-	-
<b>Working capital:</b>								
12	Materials and supplies inventory							-
13	Prepayments							-
14	Propane inventory							-
15	Cash working capital requirements							-
16	<b>Total net working capital</b>	-	-	-	-	-	-	-
17	<b>Total rate base</b>	-	-	-	-	-	-	-

Cost of Service Schedule  
 for Compound Adjustments:

INTERSTATE POWER & LIGHT COMPANY

MINNESOTA GAS UTILITY

13-MONTH AVERAGE COST OF CAPITAL FOR FINAL RATES

FOR THE PERIOD DECEMBER 31, 2012 THROUGH DECEMBER 31, 2013

YEAR ENDED DECEMBER 31, 2013

Line No.		(a) Year End Principal (1)	(b) Adjustments to Principal (2)	(c) Adjusted Principal	(d) Adjusted Capitalization Ratios	(e) Adjusted Avg. Cost of Money by Components (2)	(f) Adjusted Average Cost of Capital
1	Long-term debt	Cost of C		\$ -	0.000%	5.685% (3)	0.000%
2	Preferred Stock	194,601,576		194,601,576	10.353%	5.241% (4)	0.543%
3	Common equity	1,685,106,414		1,685,106,414	89.647%	9.400%	8.427%
4	Total	<u>\$ 1,879,707,990</u>	<u>\$ -</u>	<u>\$ 1,879,707,990</u>	<u>100.000%</u>		<u>8.970%</u>

Attachment B

IPL-Minnesota WN Gas Sales  
Sales by Rate

Attachment B  
Response to OAG Additional Question 2

IPL Margin Revenue

Estimated WN Calendar Sales by Rate (Allocated from Rev Class)

Rate	Rev Class	therms	Average Customers	Current therm Charge (less fuel)	Current Cust. Chrg.	Current Therm Rev.	Cur. Cust. Chrg. Rev.	Current Margin Rev.	Revenue with Increase	Adjusted therm Charge
10 Heating	RESIDENTIAL	8,427,357	9,431	0.19769	\$ 5.00	1,666,004	565,835	2,231,839	2,427,256	0.28802
10 Regular	RESIDENTIAL	52,721		0.19769		10,423	-	10,423	15,185	0.28802
10 Regular	COMMERCIAL	221,598	1,197	0.19769	\$ 5.00	43,808	71,805	115,613	63,825	0.28802
10 Heating	COMMERCIAL	4,189,961		0.19769		828,313	-	828,313	1,206,797	0.28802
20 Interruptible	COMMERCIAL	2,148,539	39	0.04620	\$ 14.00	99,263	6,552	105,815	144,619	0.06731
10 Regular	INDUSTRIAL	187,020	10	0.19769	\$ 5.00	36,972	600	37,572	53,866	0.28802
20 Interruptible	INDUSTRIAL	1,549,111	8	0.04620	\$ 14.00	71,569	1,344	72,913	104,271	0.06731
60 Interruptible	Transport	1,834,070	2	0.04619	\$ 200.00	84,716	4,800	89,516	123,425	0.06730
<b>Total</b>		<b>18,610,378</b>	<b>10,686</b>			<b>2,841,067</b>	<b>650,936</b>	<b>3,492,003</b>	<b>4,139,243</b>	
<b>10</b>		<b>13,078,657</b>	<b>10,637</b>	<b>0.19769</b>	<b>\$ 5.00</b>	<b>2,585,520</b>	<b>638,240</b>	<b>3,223,760</b>	<b>3,766,928</b>	<b>0.28802</b>
<b>20</b>		<b>3,697,650</b>	<b>47</b>	<b>0.04620</b>	<b>\$ 14.00</b>	<b>170,831</b>	<b>7,896</b>	<b>178,727</b>	<b>248,890</b>	<b>0.06731</b>
<b>60</b>		<b>1,834,070</b>	<b>2</b>	<b>0.04619</b>	<b>\$ 200.00</b>	<b>84,716</b>	<b>4,800</b>	<b>89,516</b>	<b>123,425</b>	<b>0.06730</b>
<b>Total</b>		<b>18,610,378</b>	<b>10,686</b>			<b>2,841,067</b>	<b>650,936</b>	<b>3,492,003</b>	<b>4,139,243</b>	

Increase \$ 1,298,176

Per Therm Increase % 46%

**Attachment B**  
**Response to OAG Additional Question 2**  
**4-Aug-14**

Rate Base	10,805,952
Operating Income	48,569
Overall Rate of Return	0.449%
Rate of Return Requested	7.493%
Required Net Operating Income	809,690
Income Deficiency	761,121
Gross Revenue Conversion Factor	1.705611
Revenue Increase Requested	1,298,176

Attachment C

**Attachment C**  
**Response to OAG Additional Question 3**  
**4-Aug-14**

MERC  
Revenue Requirements Summary  
Test Year Ending December 31, 2014

Line No.	Description	MERC's Rebuttal Position	MERC's Rebuttal Position Plus IPL
		(a)	(b)
1	Average Rate Base	\$199,192,236	\$210,205,479
2	Rate of Return After Adjustments	8.0092%	8.0092%
3	Required Operating Income	\$15,953,681	\$16,835,752
4	Operating Income	\$8,817,851	\$9,119,591
5	Income Deficiency	\$7,135,830	\$7,716,161
6	Gross Revenue Conversion Factor	1.7040	1.7040
7	Gross Revenue Deficiency	\$12,159,454	\$13,148,338
8	Change from Petitioner's Rebuttal		<b>\$988,884</b>
		4.08%	4.23%



**Attachment C**  
**Response to OAG Additional Question 3**  
**4-Aug-14**

MERC  
Rate Base Summary  
Test Year Ending December 31, 2014

Line No.	Description	MERC Filing (a)	MERC Rebuttal Adjustments (b)	MERC Rebuttal Position Plus IPL (c)
<b>PLANT IN SERVICE</b>				
1	Energy	\$999,429	\$9,828,826	\$10,828,255
2	Transmission	\$6,833,452	\$0	\$6,833,452
3	Distribution	\$368,477,466	\$0	\$368,477,466
4	Customer	\$5,206,114	\$0	\$5,206,114
5	Total Plant In Service	<u>\$381,516,461</u>	<u>\$9,828,826</u>	<u>\$391,345,287</u>
<b>RESERVE FOR DEPRECIATION</b>				
6	Energy	\$326,488	\$0	\$326,488
7	Transmission	\$3,072,997	\$0	\$3,072,997
8	Distribution	\$164,797,536	\$0	\$164,797,536
9	Customer	\$1,700,703	\$0	\$1,700,703
10	Total Reserve For Depreciation	<u>\$169,897,724</u>	<u>\$0</u>	<u>\$169,897,724</u>
<b>NET PLANT IN SERVICE</b>				
11	Energy	\$672,941	\$9,828,826	\$10,501,767
12	Transmission	\$3,760,455	\$0	\$3,760,455
13	Distribution	\$203,679,930	\$0	\$203,679,930
14	Customer	\$3,505,411	\$0	\$3,505,411
15	Total Net Plant In Service	<u>\$211,618,737</u>	<u>\$9,828,826</u>	<u>\$221,447,563</u>
16	Construction Work in Progress	\$0	\$0	\$0
17	LESS: Customer Advances	\$0	\$52,729	\$52,729
18	LESS: Accumulated Deferred Income Taxes	\$36,631,519	\$0	\$36,631,519
<b>Working Capital:</b>				
19	Cash Working Capital	(\$3,908,368)	\$785,055	(\$3,123,313)
20	Deferred Taxes Other than Plant, M&S	(\$3,140,462)	\$541,188	(\$2,599,274)
21	Non-Utility Adjustment	(\$1,530,328)	\$0	(\$1,530,328)
22	Plant Adjustment	(\$29,112)	(\$6,633)	(\$35,745)
23	Total Working Capital	<u>(\$8,608,270)</u>	<u>\$1,319,610</u>	<u>(\$7,288,660)</u>
24	Materials and Supplies	\$279,572	\$39,756	\$319,328
25	Gas Storage	\$12,013,242	\$853,699	\$12,866,941
26	Regulatory Assets/Liabilities	\$19,642,806	(\$98,251)	\$19,544,555
27	Subtotal	<u>\$31,935,620</u>	<u>\$795,204</u>	<u>\$32,730,824</u>
28	TOTAL AVERAGE RATE BASE	<u>\$198,314,568</u>	<u>\$11,890,911</u>	<u>\$210,205,479</u>

MERC  
Rate Base Adjustments  
Test Year Ending December 31, 2014

Line No.	Description	Service Extensions Kult (a)	Long Term A/R Arrearage DeMerritt (b)	Reg Liab Derivatives DeMerritt (c)	Unamortized Rate Case Expense DeMerritt (d)	Gas Storage DeMerritt (e)	IPL	CWC DeMerritt (f)	MERC Rebuttal Plus IPL Adjustments (g)
<b>PLANT IN SERVICE</b>									
1	Energy						\$9,828,826		\$9,828,826
2	Transmission								\$0
3	Distribution								\$0
4	Customer								\$0
5	Total Plant In Service	\$0	\$0	\$0	\$0	\$0	\$9,828,826	\$0	\$9,828,826
<b>RESERVE FOR DEPRECIATION</b>									
6	Energy						\$0		\$0
7	Transmission								\$0
8	Distribution								\$0
9	Customer								\$0
10	Total Reserve For Depreciation	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
<b>NET PLANT IN SERVICE</b>									
11	Energy	\$0	\$0	\$0	\$0	\$0	\$9,828,826	\$0	\$9,828,826
12	Transmission	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
13	Distribution	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
14	Customer	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
15	Total Net Plant In Service	\$0	\$0	\$0	\$0	\$0	\$9,828,826	\$0	\$9,828,826
16	Construction Work in Progress								\$0
17	LESS: Customer Advances						\$52,729		\$52,729
18	LESS: Accumulated Deferred Income Taxes								\$0
<u>Working Capital:</u>									
19	Cash Working Capital							\$785,055	\$785,055
20	Deferred Taxes Other than Plant, M&S				\$541,188				\$541,188
21	Non-Utility Adjustment								\$0
22	Plant Adjustment	(\$6,633)							(\$6,633)
23	Total Working Capital	(\$6,633)	\$0	\$0	\$541,188	\$0	\$0	\$785,055	\$1,319,610
24	Materials and Supplies						\$39,756		\$39,756
25	Gas Storage					\$853,699			\$853,699
26	Regulatory Assets/Liabilities		(\$17,066)	\$244,050	(\$1,315,335)		\$990,100		(\$98,251)
27	Subtotal	\$0	(\$17,066)	\$244,050	(\$1,315,335)	\$853,699	\$1,029,856	\$0	\$795,204
28	TOTAL AVERAGE RATE BASE	(\$6,633)	(\$17,066)	\$244,050	(\$774,147)	\$853,699	\$10,805,953	\$785,055	\$11,890,911

(-) = Reduction

**Attachment C**  
**Response to OAG Additional Question 3**  
**4-Aug-14**

MERC  
Operating Income Summary  
Test Year Ending December 31, 2014

Line No.	Description	MERC Filing (a)	MERC Rebuttal Adjustments (b)	MERC Rebuttal Position Plus IPL (c)
<b>UTILITY OPERATING REVENUES</b>				
1	Natural Gas Revenue	\$257,186,462	\$53,512,114	\$310,698,576
2	Late Payment Revenue	\$525,000	\$0	\$525,000
3	Other Revenue	\$234,470	\$51,493	\$285,963
4	Total Operating Revenues	<u>\$257,945,932</u>	<u>\$53,563,607</u>	<u>\$311,509,539</u>
<b>UTILITY EXPENSES</b>				
5	Cost of Gas	\$173,412,058	\$47,462,352	\$220,874,410
6	Production	\$10,636	\$2,865,186	\$2,875,822
7	Gas Supply	\$704,365	\$0	\$704,365
8	Transmission	\$94,181	\$0	\$94,181
9	Distribution	\$17,894,619	\$0	\$17,894,619
10	Customer Accounts	\$11,801,783	\$250,526	\$12,052,309
11	Customer Services	\$927,914	\$0	\$927,914
12	Sales	\$0	\$0	\$0
13	Administrative & General	\$15,998,503	(\$704,212)	\$15,294,291
14	Subtotal Operating Expenses	<u>\$220,844,059</u>	<u>\$49,873,852</u>	<u>\$270,717,911</u>
15	Depreciation	\$9,347,278	\$791,434	\$10,138,712
16	Amortization	\$9,656,957	\$464,978	\$10,121,935
17	Taxes Other Than Income	\$8,896,360	\$80,725	\$8,977,085
18	Other Interest Expense	\$935	\$0	\$935
19	Subtotal	<u>\$27,901,530</u>	<u>\$1,337,137</u>	<u>\$29,238,667</u>
20	Federal Income Taxes 31.602%	\$1,839,225	\$743,474	\$2,582,699
21	State Income Taxes 9.708%	(\$296,377)	\$228,392	(\$67,985)
22	Michigan State Tax	\$1,384	\$0	\$1,384
23	Subtotal Income Taxes	<u>\$1,544,232</u>	<u>\$971,866</u>	<u>\$2,516,098</u>
24	Tax Effect of Interest Synchronization	\$98,779	(\$181,508)	(\$82,729)
25	Total Income Taxes	<u>\$1,643,011</u>	<u>\$790,359</u>	<u>\$2,433,370</u>
26	Total Operating Expenses	<u>\$250,388,600</u>	<u>\$52,001,348</u>	<u>\$302,389,948</u>
27	Adjusted Net Operating Income	<u><u>\$7,557,332</u></u>	<u><u>\$1,562,259</u></u>	<u><u>\$9,119,591</u></u>

MERC  
Operating Income Adjustments  
Test Year Ending December 31, 2014

Line No.	Description	Benefits Expense Phillips (a)	Sales Forecast John (b)	Property Taxes Wilde (c)	CIP Amortization DeMerritt (d)	Uncollectible Expense DeMerritt (e)	Executive Incentive DeMerritt (f)	Miscellaneous Revenues DeMerritt (g)	Rate Case Amortization DeMerritt (h)	Charitable Contributions DeMerritt (i)	Travel and Entertainment DeMerritt (j)	Corporate Aircraft DeMerritt (k)	IPL	Interest Sync DeMerritt (l)	MERC Rebuttal Plus Adjustments (m)
UTILITY OPERATING REVENUES															
1	Natural Gas Revenue		\$40,839,155										\$12,672,959		\$53,512,114
2	Late Payment Revenue							\$51,493							\$0
3	Other Revenue														\$51,493
4	Total Operating Revenues	\$0	\$40,839,155	\$0	\$0	\$0	\$0	\$51,493	\$0	\$0	\$0	\$0	\$12,672,959	\$0	\$53,563,607
UTILITY EXPENSES															
5	Cost of Gas		\$38,873,289										\$8,589,063		\$47,462,352
6	Production												\$2,865,186		\$2,865,186
7	Gas Supply														\$0
8	Transmission														\$0
9	Distribution														\$0
10	Customer Accounts					\$250,526									\$250,526
11	Customer Services														\$0
12	Sales														\$0
13	Administrative & General	(\$651,524)					(\$27,857)			(\$16,105)	(\$7,770)	(\$956)			(\$704,212)
14	Subtotal Operating Expenses	(\$651,524)	\$38,873,289	\$0	\$0	\$250,526	(\$27,857)	\$0	\$0	(\$16,105)	(\$7,770)	(\$956)	\$11,454,249	\$0	\$49,873,852
15	Depreciation												\$791,434		\$791,434
16	Amortization				\$475,941				(\$10,963)						\$464,978
17	Taxes Other Than Income			(\$118,864)									\$199,589		\$80,725
18	Subtotal	\$0	\$0	(\$118,864)	\$475,941	\$0	\$0	\$0	(\$10,963)	\$0	\$0	\$0	\$991,023	\$0	\$1,337,137
19	Federal Income Taxes 31.602%	\$205,895	\$621,253	\$37,563	(\$150,407)	(\$79,171)	\$8,803	\$16,273	\$3,465	\$5,090	\$2,455	\$302	\$71,954	\$0	\$743,474
20	State Income Taxes 9.708%	\$63,250	\$190,846	\$11,539	(\$46,204)	(\$24,321)	\$2,704	\$4,999	\$1,064	\$1,563	\$754	\$93	\$22,104	\$0	\$228,392
21	Michigan State Tax														\$0
22	Subtotal Income Taxes	\$269,145	\$812,099	\$49,103	(\$196,611)	(\$103,492)	\$11,508	\$21,272	\$4,529	\$6,653	\$3,210	\$395	\$94,057	\$0	\$971,866
23	Tax Effect of Interest Synchronization													(\$181,508)	(\$181,508)
24	Total Income Taxes	\$269,145	\$812,099	\$49,103	(\$196,611)	(\$103,492)	\$11,508	\$21,272	\$4,529	\$6,653	\$3,210	\$395	\$94,057	(\$181,508)	\$790,359
25	Total Operating Expenses	(\$382,379)	\$39,685,388	(\$69,761)	\$279,330	\$147,034	(\$16,349)	\$21,272	(\$6,434)	(\$9,452)	(\$4,560)	(\$561)	\$12,539,329	(\$181,508)	\$52,001,348
26	Adjusted Net Operating Income	\$382,379	\$1,153,767	\$69,761	(\$279,330)	(\$147,034)	\$16,349	\$30,221	\$6,434	\$9,452	\$4,560	\$561	\$133,630	\$181,508	\$1,562,259

( ) = Reduction.

**Attachment C**  
**Response to OAG Additional Question 3**  
**4-Aug-14**

MERC  
Interest Synchronization Adjustment  
Test Year Ending December 31, 2014

<u>Line No.</u>	MERC's Filing ----- (a)	MERC Rebuttal Position ----- (b)	MERC Rebuttal Plus IPL Adjustment ----- (c)	
1	Rate Base	\$198,314,568	\$210,205,479	\$11,890,911
2	Weighted Cost of Short- & Long-term Debt	<u>2.6008%</u>	<u>2.6008%</u>	
3	MERC-MN Interest	\$5,157,779	\$5,467,038	
4	Interest included in income tax accruals	<u>\$5,326,082</u>	<u>\$5,326,082</u>	
5	Additional interest allowed (denied)	(\$168,303)	\$140,956	
6	Tax effect of interest allowed (denied)	\$98,779	(\$82,729)	(\$181,508)



**Attachment C**  
**Response to OAG Additional Question 3**  
**4-Aug-14**

MERC  
Cash Working Capital Workpaper  
Test Year Ending December 31, 2014  
Rebuttal

Line No.	Description	DOC Direct O&M Expenses	% of Total
		(a)	(b)
1	Internal Payroll Excluding Incentive	\$14,646,219	29.86%
2	MERC Internal Incentive Plan	\$688,744	1.40%
3	All Other O&M Expense	<u>\$33,712,216</u>	<u>68.73%</u>
4	Total	<u>\$49,047,179</u>	<u>100.00%</u>
MERC Rebuttal Expense Adjustments			
5	Production	<u>\$2,865,186</u>	
6	Gas Supply	\$0	
7	Transmission	\$0	
8	Distribution	\$0	
9	Customer Accounts	\$250,526	
10	Customer Services	\$0	
11	Sales	\$0	
12	Administrative & General	<u>(\$704,212)</u>	
13	Total	<u>\$2,411,500</u>	
14	Internal Payroll Excluding Incentive	\$720,110	
15	MERC Internal Incentive Plan	\$33,863	
16	All Other O&M Expense	<u>\$1,657,527</u>	
17	Total	<u>\$2,411,500</u>	

Attachment D



**Response of  
Interstate Power and Light Company  
to  
Minnesota Department of Commerce  
Division of Energy Resources  
Information Request No. 5**

Docket No.: G001,G011/PA-14-107  
Date of Request: February 14, 2014  
Response Due: February 27, 2014  
Information Requested By: Eilon Amit  
Date Responded: March 18, 2014  
Author: Amy Wheatley  
Author's Title: Lead Financial Affairs  
Author's Telephone No.: (319) 786-4704  
Subject:  
Reference:

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**Information Request No. 5**

- a. Using a 2014 Test-Year, please calculate IPL-Minnesota revenue requirements. In your calculations, please use return on equity of 9.40 percent, IPL-Minnesota 2014 projected capital structure, and 2014 projected costs of short-term debt, long-term debt and preferred stock.
- b. Using the revenue requirements calculated in part a above, please reproduce Attachment F of your filing. In your recalculations of Attachment F, please use the same rate design you used to calculate the original Attachment F.

**Response:**

- a. IPL does not currently have information available to calculate revenue requirements for IPL-Minnesota Gas jurisdiction for a 2014 test year. Attachment A has been provided that shows a preliminary estimate of revenue requirements based on a 2013 historical test year using actual financial results with pro-forma adjustments for former manufactured gas plant (FMGP) costs, rate case expenses and weather normalization for the IPL-Minnesota Gas jurisdiction. IPL has also included Attachment B, which shows each of the pro-forma adjustments that are presented in Schedule B. The information included in Attachment A is in the following order:

**Financial Summary:** Overall financial summary

**Schedule A:** Income Statement results and revenue requirements after any pro-forma adjustments.

**Schedule B:** Pro-forma adjustments to the income statement for FMGP costs amortized over a 10-year period, estimated rate case expenses amortized over a 3-year period and a weather normalization adjustment using Albert Lea weather.

The FMGP costs reflect estimates for future environmental liability mitigation projects of \$4,163,000 for the Albert Lea, Austin, New Ulm, and Owatonna sites, in addition to previously spent, but not yet recovered, remediation expenses of \$4,617,000, for a total of \$8,780,000. The total has been reduced by \$2,024,000 to reflect proceeds received from insurance settlements, for a net total of \$6,756,000 to be collected from customers over a 10-year period at the rate of \$675,600 per year. The adjustment to expenses of \$181,583 reflects the difference between \$675,600 and the \$497,017 included in current rates.

**Schedule C:** Unadjusted Year End 2013 rate base

**Schedule D:** Pro-forma adjustments to the rate base

**Schedule E:** Year End cost of capital structure using a return on equity of 9.40 percent.

- b. IPL provides Attachment C, which shows the recalculation of per therm costs (in column Q) that are reflected Attachment F, using the revenue requirements calculated in part (a) above. A reproduction of Attachment F using the revised per therm costs will be provided as a supplement to this Response.

**INTERSTATE POWER & LIGHT COMPANY  
OVERALL FINANCIAL SUMMARY  
MINNESOTA GAS RETAIL JURISDICTION**

Line	Description	(a) Reference to Supporting Schedule	(b) Actual Unadjusted 2013 Calendar Year	(d) Proposed Test Year 2013
1	Revenue	A	\$ 12,672,959	\$ 12,648,724
2	Rate Base	C	\$ 8,244,663	\$ 8,244,663
3	Operating Income	A	\$ 286,500	\$ 48,569
4	Overall Rate of Return (3 divided by 2)		3.475%	0.589%
5	Rate of Return Requested	E	7.493%	7.493%
6	Required Net Operating Income (2 x 5)		\$ 617,773	\$ 617,773
7	Income Deficiency (6 - 3)		\$ 331,273	\$ 569,204
8	Gross Revenue Conversion Factor	A	1.705611	1.705611
9	Revenue Increase Requested (7 x 8)		\$ 565,023	\$ 970,841

INTERSTATE POWER AND LIGHT COMPANY

MINNESOTA GAS UTILITY

COST OF SERVICE

YEAR ENDED DECEMBER 31, 2013

Line No.	Description	(a) Actual Test Year Results	(b) Adjustments	(c) Adjusted Test Year Results	(d) Additional Revenues Required to Yield 7.493%	(e) Total Revenues Required to Yield 7.493%
1	<b>Operating revenues</b>	\$ 12,672,959	\$ (24,235)	\$ 12,648,724	\$ 970,842	\$ 13,619,566
	<b>Operating expenses:</b>					
2	Gas purchased for resale	8,589,063	-	8,589,063		8,589,063
3	Operation expenses	2,731,204	381,583	3,112,787		3,112,787
4	Maintenance expenses	133,982	-	133,982		133,982
5	Depreciation and amortization	791,434	-	791,434		791,434
6	Property taxes	149,277	-	149,277		149,277
7	Miscellaneous taxes	50,312	-	50,312		50,312
	Income taxes -					
8	Current federal	(128,563)	(128,117)	(256,680)	306,495	49,815
9	Current state	(6,692)	(39,770)	(46,462)	95,143	48,681
10	Deferred	77,693	-	77,693		77,693
11	Investment tax credits	(1,251)	-	(1,251)		(1,251)
12	Total operating expenses	12,386,459	213,696	12,600,155	401,638	13,001,793
13	<b>Operating income</b>	286,500	(237,931)	48,569	569,204	617,773
14	<b>Rate base</b>	8,244,663	-	8,244,663		8,244,663
15	<b>Cost of Capital:</b>	3.475%		0.589%		7.493%

## INTERSTATE POWER AND LIGHT COMPANY

## MINNESOTA GAS UTILITY

## SUMMARY OF ADJUSTMENTS TO COST OF SERVICE

YEAR ENDED DECEMBER 31, 2013

	(a)	(b)	(c)	(d)	(e)	(ad)	(ae)
	B-1	B-2	B-3	B-4	B-5	B-50	
<i>Schedule:</i>							
<i>Exhibit Designation:</i>							
Line No.	2013 Weather Normalization	FMGP Amortized over 10 Years	Rate Case Expenses Amortized over 3 Years	Intentionally Left Blank	Intentionally Left Blank	Intentionally Left Blank	Total
1	Operating Revenues	(\$24,235)					\$ (24,235)
	<b>Operating Expenses:</b>						
2	Gas Purchased for Resale						0
3	Operation Expense		\$ 181,583	\$ 200,000			381,583
4	Maintenance Expense						0
5	Depreciation and Amortization						0
6	Property Taxes						0
7	Miscellaneous Taxes						0
	Income Taxes-						
8	Current Federal at 31.57%	(7,651)	(57,326)	(63,140)	-	-	(128,117)
9	Current State at 9.80%	(2,375)	(17,795)	(19,600)	-	-	(39,770)
10	Deferred						0
11	Investment Tax Credit						0
12	Total Operating Expense	(10,026)	106,462	117,260	-	-	213,696
13	Operating Income	(14,209)	(106,462)	(117,260)	-	-	(237,931)
14	Rate Base Schedule						
15	for Compound Adjustments:						

Schedule C

INTERSTATE POWER AND LIGHT COMPANY

MINNESOTA GAS UTILITY

YEAR-END  
RATE BASE

YEAR ENDED DECEMBER 31, 2013

Line No.	Description	(a) Schedule Reference	(b) Year End	(c) Adjustments	(d) Adjusted Rate Base
<b>Investment in plant:</b>					
1	Utility plant in service	C-1, C-2	9,828,826	\$ -	\$ 9,828,826
2	Accumulated deferred income taxes	C-3	(2,561,289)	-	(2,561,289)
3	Customer advances for construction	C-4	(52,729)	-	(52,729)
4	Customer deposits	C-5	(77,871)	-	(77,871)
5	Unclaimed property	C-6	-	-	-
6	Accumulated provision for uncollectibles	C-7	(76,763)	-	(76,763)
	Accrued liability for property insurance, workers compensation insurance and injuries and damages	C-8	(46,833)	-	(46,833)
8	Accrued vacation	C-9	(43,939)	-	(43,939)
9	Accrued pension plan obligations	C-10	(57,741)	-	(57,741)
10	<u>Total net investment in plant</u>		<u>6,911,661</u>	<u>-</u>	<u>6,911,661</u>
<b>Working capital:</b>					
11	Materials and supplies inventory	C-11	39,756	-	39,756
12	Prepayments	C-12	1,293,247	-	1,293,247
13	Propane inventory	C-13	-	-	-
14	Cash working capital requirements	C-14	-	-	-
15	<u>Total net working capital</u>		<u>1,333,003</u>	<u>-</u>	<u>1,333,003</u>
16	<b><u>Total rate base</u></b>		<b><u>8,244,663</u></b>	<b><u>-</u></b>	<b><u>\$ 8,244,663</u></b>

Source:  
Company Workpaper C

INTERSTATE POWER AND LIGHT COMPANY

MINNESOTA GAS UTILITY

SUMMARY OF ADJUSTMENTS TO THE RATE BASE

YEAR ENDED DECEMBER 31, 2013

Line No.	Schedule: Exhibit Designation: Brief Description of Adjustment:	(a)	(b)	(c)	(d)	(e)	(i)	(j)
		D-1 Intentionally Left Blank	D-2 Intentionally Left Blank	D-3 Intentionally Left Blank	D-4 Intentionally Left Blank	D-5 Intentionally Left Blank	D-10 Intentionally Left Blank	Total
<b>Investment in plant:</b>								
1	Utility plant in service							\$ -
2	Accumulated provision for depreciation and amortization							-
3	Accumulated deferred income taxes							-
4	Customer advances for construction							-
5	Customer deposits							-
6	Unclaimed property							-
7	Accumulated provision for uncollectibles							-
8	Accrued liability for property insurance, workers compensation insurance and injuries and damages							-
9	Accrued vacation							-
10	Accrued pension plan obligations							-
11	Total net investment in plant	-	-	-	-	-	-	-
<b>Working capital:</b>								
12	Materials and supplies inventory							-
13	Prepayments							-
14	Propane inventory							-
15	Cash working capital requirements							-
16	Total net working capital	-	-	-	-	-	-	-
17	<b>Total rate base</b>	-	-	-	-	-	-	-

Cost of Service Schedule  
for Compound Adjustments:

INTERSTATE POWER & LIGHT COMPANY

MINNESOTA GAS UTILITY

13-MONTH AVERAGE COST OF CAPITAL FOR FINAL RATES

FOR THE PERIOD DECEMBER 31, 2012 THROUGH DECEMBER 31, 2013

YEAR ENDED DECEMBER 31, 2013

Line No.		(a) Year End Principal (1)	(b) Adjustments to Principal (2)	(c) Adjusted Principal	(d) Adjusted Capitalization Ratios	(e) Adjusted Avg. Cost of Money by Components (2)	(f) Adjusted Average Cost of Capital
1	Long-term debt	\$ 1,536,574,362		\$ 1,536,574,362	44.978%	5.685% (3)	2.557%
2	Preferred Stock	194,601,576		194,601,576	5.696%	5.241% (4)	0.299%
3	Common equity	1,685,106,414		1,685,106,414	49.326%	9.400%	4.637%
4	Total	<u>\$ 3,416,282,351</u>	<u>\$ -</u>	<u>\$ 3,416,282,351</u>	<u>100.000%</u>		<u>7.493%</u>



Section 1 - Billed Sales by Rate

Rate	Rev Class	2013	2013	2013	2013	2013	2013	2013	2013	2013	2013	2013	2013	2013
		January	February	March	April	May	June	July	August	September	October	November	December	Annual DTH
10 Heating	RESIDENTIAL	157,255	152,243	126,985	95,564	59,520	23,958	15,459	13,753	15,574	22,673	67,649	141,217	891,849
10 Regular	RESIDENTIAL	882	1,067	860	547	415	108	87	101	108	154	424	827	5,579
10 Regular	COMMERCIAL	1,684	1,701	1,287	1,024	601	323	280	273	318	870	11,035	3,335	22,731
10 Heating	COMMERCIAL	73,505	72,724	59,069	48,113	26,003	9,876	8,377	7,442	9,549	10,741	34,038	70,364	429,801
20 Interruptible	COMMERCIAL	29,556	27,727	21,796	20,961	12,934	7,413	6,431	5,589	7,756	13,421	37,329	29,484	220,395
10 Regular	INDUSTRIAL	3,481	3,357	2,657	1,979	844	312	299	258	372	634	1,192	3,052	18,434
20 Interruptible	INDUSTRIAL	18,764	17,971	17,139	14,741	11,121	8,839	9,532	8,010	10,486	6,581	12,123	17,388	152,695
60 Interruptible	Transport	12,927	16,834	14,926	16,301	13,465	14,530	14,264	14,819	13,293	15,658	16,021	20,369	183,407
<b>Total</b>		<b>298,053</b>	<b>293,624</b>	<b>244,717</b>	<b>199,229</b>	<b>124,903</b>	<b>65,358</b>	<b>54,728</b>	<b>50,245</b>	<b>57,455</b>	<b>70,733</b>	<b>179,810</b>	<b>286,037</b>	<b>1,924,892</b>
10		236,807	231,092	190,856	147,226	87,383	34,577	24,501	21,827	25,921	35,072	114,338	218,795	1,368,396
20		48,319	45,698	38,935	35,702	24,055	16,251	15,963	13,599	18,241	20,002	49,452	46,873	373,089
60		12,927	16,834	14,926	16,301	13,465	14,530	14,264	14,819	13,293	15,658	16,021	20,369	183,407
<b>Total</b>		<b>298,053</b>	<b>293,624</b>	<b>244,717</b>	<b>199,229</b>	<b>124,903</b>	<b>65,358</b>	<b>54,728</b>	<b>50,245</b>	<b>57,455</b>	<b>70,733</b>	<b>179,810</b>	<b>286,037</b>	<b>1,924,892</b>

Section 2-Not Used

Section 3-Not Used

Section 4-Estimated WN Calendar Sales by Rate (Allocated from Rev Class)

Rate	Rev Class	2013	2013	2013	2013	2013	2013	2013	2013	2013	2013	2013	2013	2013	Variance	Tariff Price	Base Gas Cost	Margin	
		January	February	March	April	May	June	July	August	September	October	November	December	Annual DTH					
10 Heating	RESIDENTIAL	166,277	139,225	88,838	51,222	39,233	23,463	12,885	12,569	29,579	56,691	79,110	143,644	842,736	(49,114)	\$	0.5023	\$ 0.30464	\$ (9,707.82)
10 Regular	RESIDENTIAL	1,040	871	556	320	245	147	81	79	185	355	495	899	5,272	(307)	\$	0.5023	\$ 0.30464	\$ (60.73)
10 Regular	COMMERCIAL	3,703	3,150	2,024	1,612	837	528	498	517	847	1,394	3,976	3,074	22,160	(571)	\$	0.5023	\$ 0.30464	\$ (112.95)
10 Heating	COMMERCIAL	70,008	59,553	38,267	30,475	15,831	9,990	9,421	9,775	16,014	26,360	75,173	58,128	418,996	(10,805)	\$	0.5023	\$ 0.30464	\$ (2,135.70)
20 Interruptible	COMMERCIAL	35,899	30,538	19,623	15,627	8,118	5,123	4,831	5,013	8,212	13,517	38,547	29,807	214,854	(5,541)	\$	0.2372	\$ 0.19101	\$ (255.97)
10 Regular	INDUSTRIAL	2,197	2,199	2,035	1,590	855	1,009	1,131	1,062	1,042	718	1,692	3,172	18,702	268	\$	0.5023	\$ 0.30464	\$ 52.89
20 Interruptible	INDUSTRIAL	18,200	18,217	16,860	13,166	7,080	8,358	9,369	8,798	8,631	5,946	14,014	26,271	154,911	2,216	\$	0.2372	\$ 0.19101	\$ 102.40
60 Interruptible	Transport	12,927	16,834	14,926	16,301	13,465	14,530	14,264	14,819	13,293	15,658	16,021	20,369	183,407	-				
<b>Total</b>		<b>310,252</b>	<b>270,587</b>	<b>183,129</b>	<b>130,313</b>	<b>85,665</b>	<b>63,148</b>	<b>52,480</b>	<b>52,632</b>	<b>77,803</b>	<b>120,639</b>	<b>229,028</b>	<b>285,362</b>	<b>1,861,038</b>	<b>(63,854)</b>				
10		243,226	204,998	131,720	85,219	57,002	35,137	24,016	24,002	47,667	85,518	160,445	208,916	1,307,866	(60,530)	\$	0.5023	\$ 0.30464	\$ (11,964.32)
20		54,099	48,755	36,483	28,793	15,198	13,481	14,200	13,811	16,843	19,463	52,562	56,077	369,765	(3,324)	\$	0.2372	\$ 0.19101	\$ (153.58)
60		12,927	16,834	14,926	16,301	13,465	14,530	14,264	14,819	13,293	15,658	16,021	20,369	183,407	-				
<b>Total</b>		<b>310,252</b>	<b>270,587</b>	<b>183,129</b>	<b>130,313</b>	<b>85,665</b>	<b>63,148</b>	<b>52,480</b>	<b>52,632</b>	<b>77,803</b>	<b>120,639</b>	<b>229,028</b>	<b>285,362</b>	<b>1,861,038</b>	<b>(63,854)</b>				<b>\$ (24,235.79)</b>

**FMGP - Minnesota**

	Balance at December 2013	
FMGP Regulatory Asset		8,780,000
FMGP Insurance Proceeds		(2,024,000)
<b>Unamortized Balance 12/31/13</b>		<b>6,756,000</b>

10 year Amortization	675,600
----------------------	---------

<b>Total Proposed Annual Recovery</b>	<b>675,600</b>
Current Annual Recovery Reflected in TY	(494,017)
Addtl Annual Recovery (10yr Amort)	<b>\$ 181,583</b>

## Schedule B-3

## INTERSTATE POWER AND LIGHT COMPANY

## MINNESOTA GAS UTILITY

## PRO FORMA ADJUSTMENT TO REFLECT RATE CASE EXPENSES

YEAR ENDED DECEMBER 31, 2013

<u>Line No.</u>			
1	Estimated expenses for this rate case	\$	600,000
2	Rate case expenses amortized over a 3-year period		<u>\$ 200,000</u>

IPL-Minnesota WN Gas Sales  
 Sales by Rate

Section 1 - Billed Sales by Rate

Rate	Rev Class	2013												Annual DTH
		January	February	March	April	May	June	July	August	September	October	November	December	
10 Heating	RESIDENTIAL	157,255	152,243	126,985	95,564	59,520	23,958	15,459	13,753	15,574	22,673	67,649	141,217	891,849
10 Regular	RESIDENTIAL	882	1,067	860	547	415	108	87	101	108	154	424	827	5,579
10 Regular	COMMERCIAL	1,684	1,701	1,287	1,024	601	323	280	273	318	870	11,035	3,335	22,731
10 Heating	COMMERCIAL	73,505	72,724	59,069	48,113	26,003	9,876	8,377	7,442	9,549	10,741	34,038	70,364	429,801
20 Interruptible	COMMERCIAL	29,556	27,727	21,796	20,961	12,934	7,413	6,431	5,589	7,756	13,421	37,329	29,484	220,395
10 Regular	INDUSTRIAL	3,481	3,357	2,657	1,979	844	312	299	258	372	634	1,192	3,052	18,434
20 Interruptible	INDUSTRIAL	18,764	17,971	17,139	14,741	11,121	8,839	9,532	8,010	10,486	6,581	12,123	17,388	152,695
60 Interruptible	Transport	12,927	16,834	14,926	16,301	13,465	14,530	14,264	14,819	13,293	15,658	16,021	20,369	183,407
<b>Total</b>		<b>298,053</b>	<b>293,624</b>	<b>244,717</b>	<b>199,229</b>	<b>124,903</b>	<b>65,358</b>	<b>54,728</b>	<b>50,245</b>	<b>57,455</b>	<b>70,733</b>	<b>179,810</b>	<b>286,037</b>	<b>1,924,892</b>
<b>10</b>		<b>236,807</b>	<b>231,092</b>	<b>190,856</b>	<b>147,226</b>	<b>87,383</b>	<b>34,577</b>	<b>24,501</b>	<b>21,827</b>	<b>25,921</b>	<b>35,072</b>	<b>114,338</b>	<b>218,795</b>	<b>1,368,396</b>
<b>20</b>		<b>48,319</b>	<b>45,698</b>	<b>38,935</b>	<b>35,702</b>	<b>24,055</b>	<b>16,251</b>	<b>15,963</b>	<b>13,599</b>	<b>18,241</b>	<b>20,002</b>	<b>49,452</b>	<b>46,873</b>	<b>373,089</b>
<b>60</b>		<b>12,927</b>	<b>16,834</b>	<b>14,926</b>	<b>16,301</b>	<b>13,465</b>	<b>14,530</b>	<b>14,264</b>	<b>14,819</b>	<b>13,293</b>	<b>15,658</b>	<b>16,021</b>	<b>20,369</b>	<b>183,407</b>
<b>Total</b>		<b>298,053</b>	<b>293,624</b>	<b>244,717</b>	<b>199,229</b>	<b>124,903</b>	<b>65,358</b>	<b>54,728</b>	<b>50,245</b>	<b>57,455</b>	<b>70,733</b>	<b>179,810</b>	<b>286,037</b>	<b>1,924,892</b>

Section 2-Not Used

Section 3-Not Used

Section 4-Estimated WN Calendar Sales by Rate (Allocated from Rev Class)

Rate	Rev Class	2013												Annual DTH	therms	Current therm Charge (less fuel)	Current Revenue	Revenue Needed	Adjusted therm Charge
		January	February	March	April	May	June	July	August	September	October	November	December						
10 Heating	RESIDENTIAL	166,277.3	139,225.3	88,838.1	51,222.0	39,233.1	23,462.5	12,884.8	12,568.8	29,578.8	56,691.5	79,109.7	143,643.7	842,735.7	8,427,357	0.19769	1,666,004	2,235,306	0.26524
10 Regular	RESIDENTIAL	1,040.2	871.0	555.8	320.4	245.4	146.8	80.6	78.6	185.0	354.7	494.9	898.6	5,272.1	52,721	0.19769	10,423	13,984	0.26524
10 Regular	COMMERCIAL	3,702.6	3,149.6	2,023.9	1,611.8	837.3	528.4	498.3	517.0	847.0	1,394.1	3,975.8	3,074.3	22,159.8	221,598	0.19769	43,808	58,778	0.26524
10 Heating	COMMERCIAL	70,008.3	59,552.5	38,267.2	30,475.0	15,831.4	9,990.0	9,421.5	9,775.3	16,014.2	26,359.9	75,173.1	58,127.7	418,996.1	4,189,961	0.19769	828,313	1,111,362	0.26524
20 Interruptible	COMMERCIAL	35,899.1	30,537.5	19,622.8	15,627.0	8,118.1	5,122.7	4,831.2	5,012.6	8,211.8	13,516.9	38,547.4	29,806.9	214,853.9	2,148,539	0.04620	99,263	133,182	0.06199
10 Regular	INDUSTRIAL	2,197.2	2,199.3	2,035.5	1,589.5	854.7	1,009.1	1,131.0	1,062.2	1,042.0	717.8	1,691.9	3,171.6	18,702.0	187,020	0.19769	36,972	49,606	0.26524
20 Interruptible	INDUSTRIAL	18,199.8	18,217.5	16,860.1	13,166.5	7,080.0	8,358.4	9,368.6	8,798.2	8,631.4	5,946.0	14,014.2	26,270.6	154,911.1	1,549,111	0.04620	71,569	96,025	0.06199
60 Interruptible	Transport	12,927.0	16,834.0	14,926.0	16,301.0	13,465.0	14,530.0	14,264.0	14,819.0	13,293.0	15,658.0	16,021.0	20,369.0	183,407.0	1,834,070	0.04619	84,716	113,664	0.06197
<b>Total</b>		<b>310,251.5</b>	<b>270,586.8</b>	<b>183,129.3</b>	<b>130,313.2</b>	<b>85,665.0</b>	<b>63,147.9</b>	<b>52,480.0</b>	<b>52,631.7</b>	<b>77,803.2</b>	<b>120,638.8</b>	<b>229,028.0</b>	<b>285,362.3</b>	<b>1,861,037.8</b>	<b>18,610,378</b>		<b>2,841,067</b>	<b>3,811,908</b>	
<b>10</b>		<b>243,225.7</b>	<b>204,997.8</b>	<b>131,720.4</b>	<b>85,218.7</b>	<b>57,001.9</b>	<b>35,136.8</b>	<b>24,016.2</b>	<b>24,001.9</b>	<b>47,667.0</b>	<b>85,517.9</b>	<b>160,445.4</b>	<b>208,915.8</b>	<b>1,307,865.7</b>	<b>13,078,657</b>	<b>0.19769</b>	<b>2,585,520</b>	<b>3,469,036</b>	<b>0.26524</b>
<b>20</b>		<b>54,098.8</b>	<b>48,755.0</b>	<b>36,482.9</b>	<b>28,793.5</b>	<b>15,198.0</b>	<b>13,481.1</b>	<b>14,199.7</b>	<b>13,810.8</b>	<b>16,843.2</b>	<b>19,462.8</b>	<b>52,561.7</b>	<b>56,077.5</b>	<b>369,765.0</b>	<b>3,697,650</b>	<b>0.04620</b>	<b>170,831</b>	<b>229,207</b>	<b>0.06199</b>
<b>60</b>		<b>12,927.0</b>	<b>16,834.0</b>	<b>14,926.0</b>	<b>16,301.0</b>	<b>13,465.0</b>	<b>14,530.0</b>	<b>14,264.0</b>	<b>14,819.0</b>	<b>13,293.0</b>	<b>15,658.0</b>	<b>16,021.0</b>	<b>20,369.0</b>	<b>183,407.0</b>	<b>1,834,070</b>	<b>0.04619</b>	<b>84,716</b>	<b>113,664</b>	<b>0.06197</b>
<b>Total</b>		<b>310,251.5</b>	<b>270,586.8</b>	<b>183,129.3</b>	<b>130,313.2</b>	<b>85,665.0</b>	<b>63,147.9</b>	<b>52,480.0</b>	<b>52,631.7</b>	<b>77,803.2</b>	<b>120,638.8</b>	<b>229,028.0</b>	<b>285,362.3</b>	<b>1,861,037.8</b>	<b>18,610,378</b>		<b>2,841,067</b>	<b>3,811,908</b>	

Increase \$ 970,841

Increase % 34%

Attachment E

**Attachment E**

	<b>Response to OAG Question 1</b>			<b>Response to OAG Question 2</b>			<b>Response to OAG Question 3</b>		
	<b>Customer Charge</b>	<b>Distribution Charge</b>		<b>Customer Charge</b>	<b>Distribution Charge</b>		<b>Customer Charge</b>	<b>Distribution Charge</b>	
Residential	\$ 5.00	0.26524		\$ 5.00	0.28802		\$ 9.50	0.23560	
Commercial	\$ 5.00	0.26524		\$ 5.00	0.28802		\$ 18.00	0.20141	
Interruptible	\$ 14.00	0.06199		\$ 14.00	0.06731		\$ 165.00	0.09082	
Transport	\$ 200.00	0.06197		\$ 200.00	0.06730		\$ 275.00	0.09082	

\*The rates used for MERC rates is MERC's rebuttal position for Residential, General Service Small C&I, Small Volume Interruptible, and Small Volume Interruptible Transport.

Attachment F

**Response of  
Interstate Power and Light Company  
to  
State of Minnesota  
Office of The Attorney General  
Information Request No. 108**

Docket No.: G001,G011/PA-14-107  
 Date of Request: March 12, 2014  
 Response Due: March 24, 2014  
 Information Requested By: Ian Dobson  
 Date Responded: March 24, 2014  
 Author: Jennifer Janecek  
 Author's Title: Dir. Tax  
 Author's Telephone No.: (608) 458-3999  
 Subject:  
 Reference:

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**Information Request No. 108**

As of December 31, 2013, provide the deferred taxes and ITC balances for IPL that will be reported in IPL's Jurisdictional Annual Report. Also provide the accounting activity for deferred taxes and ITCs for 2013.

**Response:**

Deferred Taxes, Page G-26 will be filed with the 2013 Annual Report and includes FERC Accounts 282 and 283 (see Attachment A). The summary of 12/31/13 deferred tax balances, including FERC Account 190, would be:

Account 190 deferred taxes:	2,355,756
Account 282 deferred taxes:	(4,767,900)
Account 283 deferred taxes:	<u>( 250,203)</u>
Net Deferred Taxes	<u>(2,662,347)</u>

Page G-26 provides the accounting activity for FERC account 282-283 deferred income taxes. Similarly, debit/credit entries to FERC Account 190 have corresponding debit/credit entries to 410.1 and 411.1.

ITC allocated to Minnesota Gas for 2013 is \$1,251.

ITC accounting entries include debits to 255 and credits to 411.4.





IPL

Minnesota ADIT - Rate Base  
12-31-13

	MN Gas
190	2,355,756
282	(4,767,900)
283	(250,203)
	<u>(2,662,347)</u>

12/31/21 2:57 PM

IPL - Drill from Balance Sheet Accumulated Deferred Income Taxes								
Breakdown by Ferc Account & GAAP Account								
Ferc Account	Description	282001	282500	283001	283401	283500	283800	Amount
282001	ACCUM DEF INC TAX OTH PROP FED	1,250,365,917	0	0	0	0	0	1,250,365,917
282500	ACCUM DEF ST INC TAX OTH PROP	0	194,452,216	0	0	0	0	194,452,216
283001	ACCUM DEF TAX R&E FEDERAL	0	0	8,419,891	0	0	0	8,419,891
283401	ACCUM CUR DEF TAX R&E FED	0	0	0	25,079,702	0	0	25,079,702
283500	ACCUM DEF TAX R&E STATE	0	0	0	0	2,286,599	0	2,286,599
283800	ACCUM CUR DEF TAX R&E STATE	0	0	0	0	0	4,569,111	4,569,111
	<b>Accm Dfd In/Tx-Accld Amrt Prty</b>	<b>1,250,365,917</b>	<b>194,452,216</b>	<b>8,419,891</b>	<b>25,079,702</b>	<b>2,286,599</b>	<b>4,569,111</b>	<b>1,485,173,436</b>
						Federal	Acct 282	1,250,365,917
						State	Acct 282	194,452,216
						Federal	Acct 283	33,499,594
						State	Acct 283	6,855,710
							TOTAL	1,485,173,436
<b>Account 282 - Minnesota Allocation</b>								
			Basis E - Ave Gross Plant		Total MN			
	Ending Balance		MN Elec	MN Gas				
			5.84%	0.33%				
Federal	1,250,365,917	73,021,370	4,126,208	77,147,577				
State	194,452,216	11,356,009	641,692	11,997,702				
Total	1,444,818,133	84,377,379	4,767,900	89,145,279				
<b>Account 282 - Minnesota Allocation</b>								
			Basis J - A&G Basis					
	Ending Balance		MN Elec	MN Gas				
			4.47%	0.62%				
Federal	33,499,594	1,497,432	207,697	1,705,129				
State	6,855,710	306,450	42,505	348,956				
Total	40,355,303	1,803,882	250,203	2,054,085				

IPL  
 Allocation of 190 ADIT  
 In fashion similar to allocation of 283 accounts for Annual Report page G-26

Account 190 - Minnesota Allocation	Basis J - A&G Basis			
	Ending Balance	MN Elec	MN Gas	
		4.47%	0.62%	
Federal	0	0	0	0
State	0	0	0	0
<b>Total</b>	<b>379,960,677</b>	<b>16,984,242</b>	<b>2,355,756</b>	<b>19,339,998</b>

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 Ferc Balance Sheet  
 For December 2013

Account	Current Month This Year	Current Month Last Year	Variance	December 31 Prior Year	Variance	
<b>UTILITY PLANT</b>						
Utility Plant	101 - 106, 114	5,794,488,137.45	5,545,680,213.06	248,807,924.39	5,545,680,213.06	248,807,924.39
Construction Work In Progress	107	346,405,218.64	223,391,693.64	123,013,525.00	223,391,693.64	123,013,525.00
<b>Total Utility Plant</b>		<b>6,140,893,356.09</b>	<b>5,769,071,906.70</b>	<b>371,821,449.39</b>	<b>5,769,071,906.70</b>	<b>371,821,449.39</b>
Less - Accumulated Depreciation	108, 111, 115	2,301,625,610.10	2,196,591,838.57	105,033,771.53	2,196,591,838.57	105,033,771.53
<b>Net Utility Plant</b>		<b>3,839,267,745.99</b>	<b>3,572,480,068.13</b>	<b>266,787,677.86</b>	<b>3,572,480,068.13</b>	<b>266,787,677.86</b>
Nuclear Fuel	120.1 - 120.4, 120.6	0.00	0.00	0.00	0.00	0.00
Less - Accm Prvn/Amrt/Nuc Fuel Assem	120_5	0.00	0.00	0.00	0.00	0.00
<b>Net Nuclear Fuel</b>		<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>
<b>Net Utility Plant</b>		<b>3,839,267,745.99</b>	<b>3,572,480,068.13</b>	<b>266,787,677.86</b>	<b>3,572,480,068.13</b>	<b>266,787,677.86</b>
Oth Elec Plnt Adj	116	0.00	0.00	0.00	0.00	0.00
Other Utility Plant	118	(1,355,404.19)	(2,100,624.80)	745,220.61	(2,100,624.80)	745,220.61
Accm Prvn/Dpr&Amrt/Oth Utl Plt	119	0.00	0.00	0.00	0.00	0.00
<b>Total Utility Plant</b>		<b>3,837,912,341.80</b>	<b>3,570,379,443.33</b>	<b>267,532,898.47</b>	<b>3,570,379,443.33</b>	<b>267,532,898.47</b>
<b>OTHER PROPERTY AND INVESTMENTS</b>						
Nonutility Property	121	25,272,262.33	23,807,332.85	1,464,929.48	23,807,332.85	1,464,929.48
Less - Accm Prov/Dpr Amrt Nutil Prop	122	4,095,096.76	4,049,098.95	45,997.81	4,049,098.95	45,997.81
Invest in Assoc Companies	123	20,000.00	20,000.00	0.00	20,000.00	0.00
Invest In Sub Companies	123_1	0.00	0.00	0.00	0.00	0.00
Other Investments	124	18,641,524.56	17,639,851.14	1,001,673.42	17,639,851.14	1,001,673.42
Special Funds	125 - 128	8,779,951.00	0.00	8,779,951.00	0.00	8,779,951.00
<b>Total Other Property and Investments</b>		<b>48,618,641.13</b>	<b>37,418,085.04</b>	<b>11,200,556.09</b>	<b>37,418,085.04</b>	<b>11,200,556.09</b>
<b>CURRENT AND ACCRUED ASSETS</b>						
Cash	131	4,426,024.19	4,500,816.60	(74,792.41)	4,500,816.60	(74,792.41)
Special Deposits	132 - 134	211,826.70	211,826.70	0.00	211,826.70	0.00
Working Funds	135	1,580.00	1,580.00	0.00	1,580.00	0.00
Temporary Cash Investments	136	0.00	0.00	0.00	0.00	0.00
Notes Receivable	141	37,447.65	37,447.65	0.00	37,447.65	0.00
Customer Accounts Receivable	142	0.00	0.00	0.00	0.00	0.00
Other Accounts Receivable	143	256,359,741.81	109,337,696.48	147,022,045.33	109,337,696.48	147,022,045.33
Accm Prov/Uncoll Accts-Credit	144	(708,400.00)	(692,364.91)	(16,035.09)	(692,364.91)	(16,035.09)

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Ferc Balance Sheet  
For December 2013

	Account	Current Month This Year	Current Month Last Year	Variance	December 31 Prior Year	Variance
N/R From Associated Companies	145	0.00	0.00	0.00	0.00	0.00
A/R From Associated Companies	146	523,530.88	708,307.75	(184,776.87)	708,307.75	(184,776.87)
Fuel Stock	151	82,427,707.62	82,151,462.40	276,245.22	82,151,462.40	276,245.22
Fuel Stock Expenses Undistr	152	0.00	0.00	0.00	0.00	0.00
Residuals	153	0.00	0.00	0.00	0.00	0.00
Plnt Mtrls & Operating Spllies	154	39,067,977.77	32,393,510.21	6,674,467.56	32,393,510.21	6,674,467.56
Merchandise	155	0.00	0.00	0.00	0.00	0.00
Other Materials And Supplies	156	43,904.83	480,395.77	(436,490.94)	480,395.77	(436,490.94)
Nuclear Materials Hld For Sale	157	0.00	0.00	0.00	0.00	0.00
Allowances	158_1 - 158_2	0.00	0.00	0.00	0.00	0.00
Stores Expense Undistributed	163	299,111.06	403,703.01	(104,591.95)	403,703.01	(104,591.95)
Gas Stored - Current	164_1	18,913,569.71	17,253,446.71	1,660,123.00	17,253,446.71	1,660,123.00
Prepayments	165	7,985,129.45	6,720,206.56	1,264,922.89	6,720,206.56	1,264,922.89
Int And Dividends Receivable	171	0.00	0.00	0.00	0.00	0.00
Rents Receivable	172	0.00	0.00	0.00	0.00	0.00
Accrued Utility Revenues	173	0.00	0.00	0.00	0.00	0.00
Misc Current & Accrued Assets	174	0.00	1,684,139.15	(1,684,139.15)	1,684,139.15	(1,684,139.15)
Derivative Assets-Current	175	0.00	0.00	0.00	0.00	0.00
Derivative Asset Hedges-Currnt	176	20,207,630.19	17,018,169.01	3,189,461.18	17,018,169.01	3,189,461.18
<b>Total Current and Accrued Assets</b>		<b>429,796,781.86</b>	<b>272,210,343.09</b>	<b>157,586,438.77</b>	<b>272,210,343.09</b>	<b>157,586,438.77</b>
<b>DEFERRED DEBITS</b>						
Derivative Assets	175_LT	0.00	0.00	0.00	0.00	0.00
Derivative Asset Hedges LT	176_LT	876,127.59	514,066.51	362,061.08	514,066.51	362,061.08
Unamortized Debt Expense	181	9,712,758.33	8,001,448.91	1,711,309.42	8,001,448.91	1,711,309.42
Extraordinary Propertylosses	182_1	0.00	0.00	0.00	0.00	0.00
Unrcvrd Plnt & Reg Study Costs	182_2	0.00	0.00	0.00	0.00	0.00
Other Regulatory Assets	182_3	1,092,686,769.49	1,187,156,739.16	(94,469,969.67)	1,187,156,739.16	(94,469,969.67)
Prelim Survey & Invest Chrgs	183	8,561,811.43	15,459,489.52	(6,897,678.09)	15,459,489.52	(6,897,678.09)
Clearing Accounts	184	(0.42)	(0.72)	0.30	(0.72)	0.30
Temporary Facilities	185	0.00	0.00	0.00	0.00	0.00
Misc Deferred Debits	186	624,182.30	5,185,387.66	(4,561,205.36)	5,185,387.66	(4,561,205.36)
Dfd Losses/Dispstn Of Utl Plnt	187	0.00	0.00	0.00	0.00	0.00
Rsrch Dvlpmnt & Dmnstrtn Expnd	188	0.00	0.00	0.00	0.00	0.00
Unamort Debt On Reaquired Debt	189	12,208,394.13	13,634,471.87	(1,426,077.74)	13,634,471.87	(1,426,077.74)
Accm Deferred Income Taxes	190	379,960,677.36	426,931,138.42	(46,970,461.06)	426,931,138.42	(46,970,461.06)
<b>Total Deferred Debits</b>		<b>1,504,630,720.21</b>	<b>1,656,882,741.33</b>	<b>(152,252,021.12)</b>	<b>1,656,882,741.33</b>	<b>(152,252,021.12)</b>

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Ferc Balance Sheet  
For December 2013

Account	Current Month This Year	Current Month Last Year	Variance	December 31 Prior Year	Variance
<b>Total Assets and Other Debits</b>	<b>5,820,958,485.00</b>	<b>5,536,890,612.79</b>	<b>284,067,872.21</b>	<b>5,536,890,612.79</b>	<b>284,067,872.21</b>
<b>Check Total</b>	<b>5,820,958,485.00</b>	<b>5,536,890,612.79</b>	<b>284,067,872.21</b>	<b>5,536,890,612.79</b>	<b>284,067,872.21</b>
<b>PROPRIETARY CAPITAL</b>					
Common Stock Issued	201 33,426,970.00	33,426,970.00	0.00	33,426,970.00	0.00
Preferred Stock Issued	204 200,000,000.00	150,000,000.00	50,000,000.00	150,000,000.00	50,000,000.00
Capital Stock Subscribed	202, 205 0.00	0.00	0.00	0.00	0.00
Stock Liability for Conversion	203, 206 0.00	0.00	0.00	0.00	0.00
Premium On Capital Stock	207 258,972,832.99	258,972,832.99	0.00	258,972,832.99	0.00
Other Paid-In Capital	208 - 211 899,263,133.79	779,323,689.79	119,939,444.00	779,323,689.79	119,939,444.00
Installments Received-Cap Stk	212 0.00	0.00	0.00	0.00	0.00
Discount On Capital Stock	213 0.00	(4,900,000.00)	4,900,000.00	(4,900,000.00)	4,900,000.00
Capital Stock Expense	214 (5,398,424.48)	(500,065.00)	(4,898,359.48)	(500,065.00)	(4,898,359.48)
Retained Earnings	215, 215_1, 216 493,443,477.04	447,960,116.51	45,483,360.53	447,960,116.51	60,181,539.70
Unappr Undist Sub Earnings	216_1 0.00	0.00	0.00	0.00	0.00
Reacquired Capital Stock	217 0.00	0.00	0.00	0.00	0.00
Accum Oth Comprehensive Income	219 0.00	0.00	0.00	0.00	0.00
<b>Total Proprietary Capital</b>	<b>1,879,707,989.34</b>	<b>1,664,283,544.29</b>	<b>215,424,445.05</b>	<b>1,664,283,544.29</b>	<b>215,424,445.05</b>
<b>LONG-TERM DEBT</b>					
Bonds	221 1,563,385,000.00	1,313,385,000.00	250,000,000.00	1,313,385,000.00	250,000,000.00
Reacquired Bonds	222 0.00	0.00	0.00	0.00	0.00
Advances From Assoc Companies	223 33,263,274.00	43,221,268.00	(9,957,994.00)	43,221,268.00	(9,957,994.00)
Other Long Term Debt	224 0.00	50,000,000.00	(50,000,000.00)	50,000,000.00	(50,000,000.00)
Unamortized Premium On Lt Debt	225 159,308.80	167,143.65	(7,834.85)	167,143.65	(7,834.85)
Unamrt Discnt On Lt Debt-Debit	226 (5,160,889.80)	(4,081,336.96)	(1,079,552.84)	(4,081,336.96)	(1,079,552.84)
<b>Total Long-Term Debt</b>	<b>1,591,646,693.00</b>	<b>1,402,692,074.69</b>	<b>188,954,618.31</b>	<b>1,402,692,074.69</b>	<b>188,954,618.31</b>
<b>OTHER NONCURRENT LIABILITIES</b>					
Oblig Under Capl Lease--Noncur	227 584,078.94	1,931,148.50	(1,347,069.56)	1,931,148.50	(1,347,069.56)
Accm Provision For Prop Insur	228_1 0.00	0.00	0.00	0.00	0.00
Accm Prov / Injuries & Damages	228_2 375,470.79	309,593.15	65,877.64	309,593.15	65,877.64
Accm Prov/Pensions & Benefits	228_3 50,686,089.57	125,933,223.69	(75,247,134.12)	125,933,223.69	(75,247,134.12)
Accm Misc Operating Provisions	228_4 10,512,780.88	3,249,836.00	7,262,944.88	3,249,836.00	7,262,944.88
Accm Provision / Rate Refunds	229 0.00	0.00	0.00	0.00	0.00
ARO FAS 143 Liab	230 47,868,127.79	45,575,503.82	2,292,623.97	45,575,503.82	2,292,623.97

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Account	Current Month This Year	Current Month Last Year	Variance	December 31 Prior Year	Variance
<b>Total Other Noncurrent Liabilities</b>	<b>110,026,547.97</b>	<b>176,999,305.16</b>	<b>(66,972,757.19)</b>	<b>176,999,305.16</b>	<b>(66,972,757.19)</b>
<b>CURRENT AND ACCRUED LIABILITIES</b>					
Notes Payable	231 0.00	26,300,000.00	(26,300,000.00)	26,300,000.00	(26,300,000.00)
Accounts Payable	232 197,435,694.93	175,086,788.22	22,348,906.71	175,086,788.22	22,348,906.71
Notes Pay To Assoc Companies	233 0.00	0.00	0.00	0.00	0.00
A/P To Associated Companies	234 29,628,276.98	29,669,867.36	(41,590.38)	29,669,867.36	(41,590.38)
Customer Deposits	235 5,562,247.86	5,373,026.07	189,221.79	5,373,026.07	189,221.79
Taxes Accrued	236 51,079,556.12	47,412,118.83	3,667,437.29	47,412,118.83	3,667,437.29
Interest Accrued	237 25,456,257.65	22,134,489.57	3,321,768.08	22,134,489.57	3,321,768.08
Dividends Declared	238 425,003.00	523,372.45	(98,369.45)	523,372.45	(98,369.45)
Matured Long-Term Debt	239 0.00	0.00	0.00	0.00	0.00
Matured Interest	240 0.00	0.00	0.00	0.00	0.00
Tax Collections Payable	241 5,551,528.17	2,746,719.13	2,804,809.04	2,746,719.13	2,804,809.04
Misc Curr & Accrd Liabilities	242 16,654,145.20	18,655,108.20	(2,000,963.00)	18,655,108.20	(2,000,963.00)
Oblig Under Cptl Leases-Currnt	243 266,756.15	250,954.52	15,801.63	250,954.52	15,801.63
Derivative Liabilities-Current	244 0.00	0.00	0.00	0.00	0.00
Derivative Liab Hedges-Current	245 3,059,349.61	14,078,411.10	(11,019,061.49)	14,078,411.10	(11,019,061.49)
<b>Total Current &amp; Accrued Liabilities</b>	<b>335,118,815.67</b>	<b>342,230,855.45</b>	<b>(7,112,039.78)</b>	<b>342,230,855.45</b>	<b>(7,112,039.78)</b>
<b>DEFERRED CREDITS</b>					
Derivative Liabilities	244_LT 0.00	0.00	0.00	0.00	0.00
Derivative Liab Hedges - LT	245_LT 2,250,081.53	1,981,759.24	268,322.29	1,981,759.24	268,322.29
Customer Adv For Construction	252 15,837,771.22	13,260,316.68	2,577,454.54	13,260,316.68	2,577,454.54
Accm Defrd Invest Tax Credits	255 3,695,552.83	4,339,362.83	(643,810.00)	4,339,362.83	(643,810.00)
Dfd Gains/Disposition-Util Plt	256 0.00	0.00	0.00	0.00	0.00
Other Deferred Credits	253 60,374,642.99	67,914,341.53	(7,539,698.54)	67,914,341.53	(7,539,698.54)
Other Regulatory Liabilities	254 337,126,954.01	428,282,371.72	(91,155,417.71)	428,282,371.72	(91,155,417.71)
Unamort Gain-Reacquired Debt	257 0.00	0.00	0.00	0.00	0.00
Accumulated Deferred Income Taxes	281 - 283 1,485,173,436.32	1,434,906,681.08	50,266,755.24	1,434,906,681.08	50,266,755.24
<b>Total Deferred Credits</b>	<b>1,904,458,438.90</b>	<b>1,950,684,833.08</b>	<b>(46,226,394.18)</b>	<b>1,950,684,833.08</b>	<b>(46,226,394.18)</b>
<b>Total Liab and Other Credits</b>	<b>5,820,958,484.88</b>	<b>5,536,890,612.67</b>	<b>284,067,872.21</b>	<b>5,536,890,612.67</b>	<b>284,067,872.21</b>
<b>Check Total</b>	<b>5,820,958,484.88</b>	<b>5,536,890,612.67</b>	<b>284,067,872.21</b>	<b>5,536,890,612.67</b>	<b>284,067,872.21</b>



AFFIDAVIT OF SERVICE

STATE OF MINNESOTA            )  
                                                  ) ss  
COUNTY OF HENNEPIN        )

Kristin M. Stastny hereby certifies that on the 4th day of August, 2014, she filed the attached Response to the Questions of the Office of the Attorney General – Antitrust and Utilities Division on behalf of Interstate Power and Light Company and Minnesota Energy Resources Corporation with the E-Docket system and provided service as specified on the attached service list.

/s/ Kristin M. Stastny  
Kristin M. Stastny

Subscribed and sworn to before me  
this 4th Day of August, 2014.

/s/ Alice Jaworski  
Notary Public, State of Minnesota

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_14-107_Official
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_14-107_Official
Lisa	Crum	lisa.crum@ag.state.mn.us	Office of the Attorney General-PUC	445 Minnesota Street, 1100 BRM  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_14-107_Official
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_14-107_Official
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_14-107_Official
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-107_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	90 South 7th Street Suite #4800 Minneapolis, MN 554024129	Electronic Service	No	OFF_SL_14-107_Official
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_14-107_Official
Erik	Madsen	ErikMadsen@alliantenergy.com	Alliant Energy	200 First St SE  Cedar Rapid, IA 52401	Electronic Service	No	OFF_SL_14-107_Official
Valerie	Means	valerie.means@lawmoss.com	Moss & Barnett	Suite 4800 90 South Seventh Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-107_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Stastny	stastny.kristin@dorsey.com	Dorsey & Whitney LLP	50 South 6th Street Suite 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-107_Official
Gregory	Walters	gjwalters@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	3460 Technology Dr. NW  Rochester, MN 55901	Electronic Service	No	OFF_SL_14-107_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Michael	Ahern	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	50 S 6th St Ste 1500  Minneapolis, MN 554021498	Electronic Service	No	SPL_SL_14-107_Potentially Interested Parties
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	SPL_SL_14-107_Potentially Interested Parties
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	SPL_SL_14-107_Potentially Interested Parties
Michael	Auger	mauger@usenergyservices.com	U S Energy Services, Inc.	Suite 1200 605 Highway 169 N Minneapolis, MN 554416531	Electronic Service	No	SPL_SL_14-107_Potentially Interested Parties
John	Bailey	bailey@ilsr.org	Institute For Local Self-Reliance	1313 5th St SE Ste 303  Minneapolis, MN 55414	Electronic Service	No	SPL_SL_14-107_Potentially Interested Parties
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_14-107_Potentially Interested Parties
James J.	Bertrand	james.bertrand@leonard.com	Leonard Street & Deinard	150 South Fifth Street, Suite 2300  Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-107_Potentially Interested Parties
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kathleen M.	Brennan	kmb@mcgrannshea.com	McGrann Shea Carnival	Straughn & Lamb, Chartered 800 Nicollet Mall, Suite 2600 Minneapolis, MN 554027035	Electronic Service	No	SPL_SL_14- 107_Potentially Interested Parties
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Gary	Chesnut	gchesnut@agp.com	AG Processing Inc. a cooperative	12700 West Dodge Road PO Box 2047 Omaha, NE 681032047	Electronic Service	No	SPL_SL_14- 107_Potentially Interested Parties
City	Clerk	N/A	City of Clarks Grove	City Hall 101 Independence Ave N Clarks Grove, MN 56016	Paper Service	No	SPL_SL_14- 107_Potentially Interested Parties
City	Clerk	N/A	City of Rose Creek	City Hall 105 Maple Street Rose Creek, MN 55970	Paper Service	No	SPL_SL_14- 107_Potentially Interested Parties
City	Clerk	N/A	City of Lyle	City Hall 109 Grove Street Lyle, MN 55953	Paper Service	No	SPL_SL_14- 107_Potentially Interested Parties
City	Clerk	N/A	City of Adams	303 West Main St.  Adams, MN 55909	Paper Service	No	SPL_SL_14- 107_Potentially Interested Parties
City	Clerk	N/A	City of Hollandale	Village Hall 102 Park Ave W Hollandale, MN 56045	Paper Service	No	SPL_SL_14- 107_Potentially Interested Parties
City	Clerk	N/A	City of Geneva	City Hall 403 4th Street Geneva, MN 56035	Paper Service	No	SPL_SL_14- 107_Potentially Interested Parties

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City	Clerk	N/A	City of Le Roy	City Hall 122 W Main St. Le Roy, MN 55951	Paper Service	No	SPL_SL_14- 107_Potentially Interested Parties
City	Clerk	sschulte@ci.albertlea.mn.us	City of Albert Lea	221 E Clark St  Albert Lea, MN 56007	Electronic Service	No	SPL_SL_14- 107_Potentially Interested Parties
City	Clerk	N/A	City of Glenville	City Hall 221 W Main Street Glenville, MN 56036	Paper Service	No	SPL_SL_14- 107_Potentially Interested Parties
City	Clerk	N/A	City of Conger	City Hall 51 School St, Alden, MN 56009	Paper Service	No	SPL_SL_14- 107_Potentially Interested Parties
City	Clerk	N/A	City of Wykoff	City Hall 217 Gold St N Wykoff, MN 55990	Paper Service	No	SPL_SL_14- 107_Potentially Interested Parties
Seth	DeMerritt	ssdemerritt@integrysgroup.com	Integritys Business Support	700 North Adams P.O. Box 19001 Green Bay, WI 543079001	Electronic Service	No	SPL_SL_14- 107_Potentially Interested Parties
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Paula	Johnson	paulajohnson@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	SPL_SL_14- 107_Potentially Interested Parties
Larry	Johnston	lw.johnston@smmpa.org	SMMPA	500 1st Ave SW  Rochester, MN 55902-3303	Electronic Service	No	SPL_SL_14- 107_Potentially Interested Parties



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Jon Erik	Kingstad	N/A	-	2725 Saddle Ct Unit E  Stillwater, MN 55082-4583	Paper Service	No	SPL_SL_14- 107_Potentially Interested Parties
Jim	Krueger	jkrueger@fmcs.coop	Freeborn-Mower Cooperative Services	Box 611  Albert Lea, MN 56007	Electronic Service	No	SPL_SL_14- 107_Potentially Interested Parties
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James D.	Larson	james.larson@avantenergy .com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14- 107_Potentially Interested Parties
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	SPL_SL_14- 107_Potentially Interested Parties
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Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	SPL_SL_14- 107_Potentially Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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John	McWilliams	jmm@dairy.net.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817  La Crosse, WI 54601-7227	Electronic Service	No	SPL_SL_14-107_Potentially Interested Parties
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Barbara	Nick	banick@integrysgroup.com	Minnesota Energy Resources Corporation	2665 145th Street PO Box 455 Rosemount, MN 55068-0455	Electronic Service	No	SPL_SL_14-107_Potentially Interested Parties
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Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137  Minneapolis, MN 55402	Electronic Service	No	SPL_SL_14-107_Potentially Interested Parties
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Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_14-107_Potentially Interested Parties
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Gregory	Walters	gjwalters@minnesotaenergyresources.com	Minnesota Energy Resources Corporation	3460 Technology Dr. NW  Rochester, MN 55901	Electronic Service	No	SPL_SL_14- 107_Potentially Interested Parties
Casey	Whelan		U.S. Energy Services, Inc.	Suite 1200 605 Highway 169 North Minneapolis, MN 554416531	Paper Service	No	SPL_SL_14- 107_Potentially Interested Parties
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	SPL_SL_14- 107_Potentially Interested Parties
James P.	Zakoura	Jim@smizak-law.com	Smithyman & Zakoura Chartered	750 Commerce Plaza II 7400 West 110th Street Overland Park, KS 662102362	Paper Service	No	SPL_SL_14- 107_Potentially Interested Parties