

July 30, 2020

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

RE: **Comments of the Minnesota Commerce Department, Division of Energy Resources**
Docket No. G011/GR-17-563

Dear Mr. Seuffert:

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

Minnesota Energy Resources Corporation's Compliance Filing Regarding Improved Customer Experience (ICE) Implementation for WEC Legacy Utilities
In the Matter of the Application of Minnesota Energy Resources Corporation for Authority to Increase Rates for Natural Gas Service in Minnesota

The Compliance Filing was submitted on October 4, 2019 by:

Mary L. Wolter
Director – Gas Regulatory Planning & Policy
Minnesota Energy Resources Corporation
2685 145th Street West
Rosemount, MN 55068

The Department recommends that the Minnesota Public Utilities Commission (Commission) **accept the Compliance Filing as complete, pending submission of additional information.** The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ ANGELA BYRNE
Financial Analyst

AB/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. G011/GR-17-563

I. INTRODUCTION

In Docket No. G011/GR-15-736 (2015 rate case),¹ Minnesota Energy Resources Corporation (MERC or the Company) proposed recovery of its Improved Customer Experience (ICE) platform project, to replace its aging telephony and Vertex billing systems. This platform was rolled out simultaneously to other Integrys legacy utilities,² allocating approximately ten percent of the capital and operating and maintenance (O&M) costs to MERC. In its testimony, the Minnesota Department of Commerce, Division of Energy Resources (Department) raised concerns regarding the allocation of costs if ICE was paid for by Integrys legacy utilities and then later implemented to WEC legacy utilities. In response, the Company stated that, at that time, it had no plan to roll out ICE to the WEC legacy utilities. Nevertheless, MERC agreed to provide a compliance filing in the event that the Company planned to implement ICE for WEC legacy utilities. Order Point 9 of the Minnesota Public Utilities Commission's (Commission) Order³ stated,

In the event that WEC decides to implement the ICE system for its WEC legacy utilities prior to MERC filing its next rate case, MERC should make a filing within 30 days of such a decision, which shall be no less than 12 months before initial implementation for WEC legacy utilities. Approval by the WEC board of directors will be considered the point of decision and will trigger the start of the 30 days. The filing should provide details of WEC's implementation plans and a proposal for adjusting the costs paid by MERC's customers for the ICE system to ensure the costs paid by MERC's customers are reasonable. If such a filing is made prior to the next rate case, the Commission can determine, at that time, whether to revise the contents of the filing to be made by MERC in its next case, as discussed above.

In Docket No. G011/GR-17-563 (2017 rate case), MERC stated in its initial testimony⁴ that WEC had not yet made a decision regarding whether to implement the ICE system for the WEC legacy utilities but anticipated that the WEC Board of Directors may soon approve an exploratory project. A decision was

¹ *In the Matter of the Application of Minnesota Energy Resources Corporation for Authority to Increase Rates for Natural Gas Service in Minnesota.*

² Integrys was MERC's parent company before WEC Energy Group purchased Integrys in 2015.

³ *Findings of Fact, Conclusions, and Order*, issued October 31, 2016.

⁴ Submitted October 13, 2017.

ultimately reached on July 19, 2018, when the Board of Directors of WEC Energy Group approved a project entitled “ICE (Open-C) R3.” This project was to include the conversion of the WEC legacy utilities to the ICE platform and implementation of necessary upgrades and enhancements to Open-C across all WEC utilities by mid-2020.

On August 9, 2018, MERC provided the Commission with the 30-days’ notice required by the 2015 rate case Order Point 9 and proposed to file the remaining analyses within 90 days of design completion, which was scheduled to be concluded in the third quarter of 2019. This timeline, MERC stated, would enable the Company to develop a better sense of the likely costs and benefits of the roll-out to other utilities to ensure costs to MERC are reasonable.

In the Commission’s 2017 rate case Order,⁵ Order Point 27 required that MERC provide the following information in a compliance filing:

- a. The business case, design plans and implementation plan for extension of Improved Customer Experience (ICE) to other WEC legacy utilities within 90-days of completion of the exploration project;
- b. A detailed discussion of costs and benefits to MERC of the roll-out to other utilities;
- c. A discussion of any work avoided by the WEC legacy utilities due to initial development of the ICE customer platform for legacy Integrys utilities;
- d. A discussion of the extent to which the allocations of costs (according to the WEC affiliated interest agreement – AIA) captures the costs and benefits to the participating utilities;
- e. A cost recovery proposal to return all appropriate amounts to MERC customers if, following roll out to MERC’s affiliates, the AIA itself does not ensure that MERC ratepayers do not pay a disproportionate share of ICE.

On October 4, 2019, MERC filed its *Compliance Filing Regarding Improved Customer Experience (ICE) Implementation for WEC Legacy Utilities* (Compliance Filing) pursuant to Order Point 27 of the Commission’s 2017 rate case Order. In its Compliance Filing, MERC stated that consistent with testimony, the Administrative Law Judge’s *Findings of Fact, Summary of Public Testimony, Conclusions of Law, and Recommendation*, and the Commission’s decision in Docket No. G011/GR-17-563, it determined that WEC Energy Group’s design phase of the ICE project could be equivalent to the “exploration project” referred to in part (a). MERC stated that the design phase was completed on approximately July 5, 2019, establishing a due date for this compliance filing of October 4, 2019.

II. DEPARTMENT ANALYSIS

Below is the Department’s review and analysis of Attachment A in MERC’s Compliance Filing, broken out by each Order Point component listed above.

⁵ Issued December 26, 2018.

A. BUSINESS CASE, DESIGN PLANS, AND IMPLEMENTATION PLAN

According to MERC, implementing the ICE system to WEC legacy utilities is a component of a larger “Customer Service 2022” (CS2022) plan to unify and simplify customer service across all utilities. The plan includes, among other things, rolling out advanced metering infrastructure (AMI) across several WEC jurisdictions, installing Mobile Work Management, and upgrades to its website for customer access to bills.⁶

MERC provided the following business reasons for consolidating all of WEC Energy Group’s utilities into a single platform (Open-CIS):

- All WEC Energy Group companies except WE Energies⁷ are already using the Open-CIS system;
- WE Energies’ existing customer service system (“CSS”) is approaching end of life and would need significant investment to support future rate structures, new operating systems (Windows 10), and ongoing web security;
- Consolidation enables synergies and savings through common processes, resource sharing, and reduced system maintenance; and
- Implementation of ICE for the WEC Legacy Utilities is occurring in conjunction with upgrades and functional improvements, allowing for even more features to be added in an upcoming version.

Additionally, MERC provided a list of thirteen benefits to MERC directly for update versions R2.22, R2.23, and R3, including:

- added capabilities within the CIS to enable AMI deployment;⁸
- improved interaction with gas suppliers to streamline gas supply purchasing and reporting;
- improved processes for restoring service for customers who have been disconnected for non-payment;
- improved processes and efficiencies for customers requesting to stop, start, or transfer service;
- increased automation of customer collection activities and schedules; and
- improved processes for collection, management, and refund of customer security deposits.

In regards to implementation, MERC stated,⁹

Implementation of ICE for the WEC Legacy Utilities is planned to occur in conjunction with the preparation and release of additional upgrades to the

⁶ Compliance Filing, Attachment A, page 1.

⁷ WE Energies includes Wisconsin Electric Power and Wisconsin Gas under the larger WEC Energy Group umbrella.

⁸ As of August 2019, 146 AMI meters have been installed at MERC customer locations (Compliance, Attachment A, page 1). According to MERC’s Service Quality filing in Docket No. G011/M-20-456, the Company had an average of over 240,000 meters in 2019.

⁹ Compliance Filing, Attachment A, page 3.

current ICE systems. These upgrades include functional improvements and contingency releases for the legacy Integrys utilities currently using ICE, including MERC. These upgrades also pave the way for the new features that will be available in R3. Version R2.22 went live in August 2019, and R2.23 is planned for the first quarter of 2020.

...

Given the large number of electric customers in the WE Energies service territory, the stabilization and support could be negatively impacted by spring and summer storm season activity. Milwaukee is also hosting the Democratic National Convention in July, which is anticipated to be a major distraction and stress on city resources. Therefore, this month, the ICE project deployment date was extended by WEC Executive Management from a planned deployment date of April, 2020 to October, 2020.

In light of the COVID-19 pandemic disrupting businesses toward the end of the first quarter of 2020, the Department issued Information Request No. 9 (IR 9) requesting a timeline update for versions R2.23 and R3. MERC responded that version R2.23 went live in February 2020, and version R3 is scheduled for January 22, 2021.

The Department is encouraged to hear that the project remains relatively close to the original schedule in light of the pandemic. The Department concludes that MERC has complied with part a. of Order Point 27 in the 2017 rate case Order.

B. COSTS AND BENEFITS TO MERC OF THE ROLL-OUT TO OTHER WEC LEGACY UTILITIES

Part b. of Order Point 27 required MERC to provide a detailed discussion of the costs and benefits to MERC of the roll-out to other utilities.

MERC stated that its ratepayers will first benefit from the version R3 of CS2022, which includes rolling out the ICE platform to WEC Legacy utilities, through enhancements and improvements to current system functionalities. The Company said, "MERC will receive the benefits of a comprehensive, digital customer service solution (billing, AMI network, mobile phone app, etc.) at a substantially lower cost resulting from the economies of scale of spreading costs over a larger group of customers."¹⁰ Second, MERC ratepayers will pay a smaller share of going-forward capital investments and O&M expenses common to all WEC utilities.

The total cost of version R3 of the CS2022 program is \$107.8 million, \$70.3 million of which is directly billable to WEC Legacy utilities. The remaining \$37.5 million is related to necessary hardware and software upgrades benefitting all utilities. MERC has been allocated \$1.946 million of these costs, or approximately 5.2 percent.

¹⁰ Compliance Filing, Attachment A, page 7.

The Department concludes that MERC has complied with part b. of Order Point 27 in the 2017 rate case Order.

C. WORK AVOIDED BY WEC LEGACY UTILITIES

In its 2017 rate case Order, the Commission required that MERC provide a discussion of any work avoided by the WEC legacy utilities due to initial development of the ICE customer platform for legacy Integrys utilities.

In its Compliance Filing, MERC stated in part,¹¹

Legacy WEC utilities are not able to avoid work by adopting ICE. They would have had to either (1) invest time and capital into their existing CSS, a system that was reaching end of life; (2) independently acquire or develop a new customer system for use only by the legacy WEC utilities; or (3) invest in significant modifications necessary to adopt ICE. *MERC and the other legacy Integrys companies did make an initial investment in ICE that is now being shared with the WEC Legacy Utilities, but this is consistent with all of the other software applications and innovations originally owned/created by WEC that are now being shared with the legacy Integrys companies.* The benefit of the merger is that the utilities can compare systems and preserve best practices and adopt them uniformly throughout, reducing overall capital and O&M on a per-customer basis for all. [*Emphasis added.*]

The Department issued Information Request No. 10 (IR 10) requesting a list of WEC pre-acquisition business applications and innovations now shared with MERC. MERC responded with the following list of applications and their uses:

- SAP ERP – Finance, supply chain, inventory/warehousing, time entry, payroll, benefits;
- UI Planner – Financial planning and forecasting;
- Power Plan Property Accounting;
- Power Plant Power Tax;
- Value Line Financial Market Valuation;
- iAvenue – Large account CRM (customer relations management);
- Aspect Work Force Manager; and
- Remedy – IT Service Management

The Department requests that MERC provide additional discussion on a few specific applications included in the above list. In its Reply Comments, MERC should discuss why Value Line is appropriate

¹¹ Compliance Filing, Attachment A, page 7.

to include in this list, as it is a subscription service, not an off-the-shelf or internally-developed software application. The Department requests that MERC clarify whether it had a subscription to Value Line prior to the WEC acquisition, whether it uses the subscription currently, and any cost differential experienced. Additionally, iAvenue and Aspect Work Force Manager appear to be customer relations management and call center software, respectively. MERC should provide clarification as to why these applications are not duplicative of functionalities within the ICE platform.

D. ALLOCATIONS OF COSTS PER THE WEC AFFILIATED INTEREST AGREEMENT (AIA)

In Order Point 27.d. of the 2017 rate case Order, MERC was required to provide discussion of the extent to which the allocations of costs (according to the WEC affiliated interest agreement – AIA) captures the costs and benefits to the participating utilities. In response, MERC stated that costs associated with implementing version R3 of the CS2022 program were allocated based on the standard practice of first billing direct costs to the appropriate utilities and then allocating indirect costs. The Company stated,¹²

...costs related to necessary hardware and software upgrades benefiting all utilities will be allocated based on number of customers where customers receiving both natural gas and electric services are counted as two customers for the purposes of the allocations.

MERC has been assigned approximately five percent of the version R3 costs allocated across utilities.¹³ This is about half of the initial 11 percent allocation of the initial capital costs assigned to MERC for the ICE platform that was created for Integry's legacy utilities. According to MERC's response to the Department's Information Request No. 11,¹⁴ the entirety of these indirect costs are capital costs amortized over a 15-year useful life.

Regarding the benefits of allocating costs according to the AIA, MERC stated,¹⁵

The WEC AIA benefits MERC and its customers as virtually any service MERC provides or obtains will be provided to, or obtained from, entities who are uniquely qualified to provide the service and will result in economies of scale. The AIA is narrowly tailored and allows for the continuation of reasonable procedures and pricing among affiliated service providers, and thus provides a reasonable basis as the governing agreement for the provision of intercompany shared services provided by affiliates.

¹² Compliance Filing, Attachment A, page 8.

¹³ \$1.946 million of approximately \$37.5 million.

¹⁴ Department Attachment 3.

¹⁵ Compliance Filing, Attachment A, page 8.

The Department concludes that MERC complied with the Commission's 2017 rate case Order Point 27.d.

E. COST RECOVERY

The final requirement of Order Point 27 was for MERC to provide a cost recovery proposal to return all appropriate amounts to MERC customers if, following roll out to MERC's affiliates, the AIA itself does not ensure that MERC ratepayers do not pay a disproportionate share of ICE.

In response, MERC stated that it would be inappropriate to reallocate costs incurred by legacy Integrys utilities for prior implementations of the ICE platform,¹⁶

Given the nature and associated benefits of such investments, a reallocation of previous costs associated with the implementation of ICE for the legacy Integrys utilities, including MERC, is not reasonable or necessary, just as MERC should not reasonably be charged for the costs of software originally purchased or developed by other WEC utility affiliates that MERC has been able to adopt post-merger.

...

The AIA ensures that MERC customers do not pay a disproportionate share of ICE on a going-forward basis. MERC's customers also benefit going forward because the costs of the system enhancements and O&M expense are being shared across a larger pool of users.

The discussions in Section II.C and II.D above generally support both of MERC's assertions here. While total costs for the customer service suite have increased, the percentage of the incremental costs allocated to MERC has dropped by half. The Department will refrain, however, from making a conclusion about the re-allocation of prior ICE costs until it can evaluate the additional information on the technology applications shared from WEC to MERC, requested in Section II.C.

As always, costs related to the CS2022 project, directly assigned and/or allocated to MERC going forward, will be evaluated in MERC's next rate case.

III. CONCLUSION AND RECOMMENDATIONS

Based on the above discussion, the Department requests that MERC provide additional discussion on the list of applications exchanged from WEC in Section II.C. In its Reply Comments, MERC should discuss why Value Line is appropriate to include in that list, as it is a subscription service, not an off-the-shelf or internally-developed software application. Additionally, iAvenue and Aspect Work Force Manager appear to be customer relations management and call center software, respectively. MERC should provide clarification as to why these applications are not duplicative of functionalities within

¹⁶ Compliance Filing, Attachment A, page 9.

the ICE platform. The Department will make a recommendation regarding the re-allocation of previously-incurred costs for the development of the ICE platform after evaluating MERC's Reply Comments.

The Department appreciates the information provided MERC in its Compliance Filing, and concludes that the Company has generally satisfied the requirements of Order Point 27 in the Commission's 2017 rate case Order. Therefore, the Department recommends that the Commission accept MERC's Compliance Filing, pending submission of further information from the Company. This recommendation does not apply to the reasonableness of the overall costs of the CS2022 program, or allocation of those costs to MERC. That analysis will be completed during the Department's investigation period in the Company's next rate case.

/ja



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/GR-17-563

Requested From: Minnesota Energy Resources Corp.

Type of Inquiry: General

Nonpublic Public

Date of Request: 6/15/2020

Response Due: 6/25/2020

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Angela Byrne

Email Address(es): angela.byrne@state.mn.us

Phone Number(s): 651-539-1820

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 9

Topic: Timeline Update for ICE Version R2.23 and R3 Deploy to WEC

Reference(s): October 4, 2019 Filing, Pages 2-3

Request:

At the time of MERC's filing, the deployment of ICE Version R2.23 was scheduled to be concluded in Q1 2020 and deployment of Version R3 was delayed from April 2020 to October 2020. Please provide an update on these timelines for the implementation of ICE to the WEC legacy utilities.

Response:

Version R2.23 went live in February, 2020. Version R3 has been scheduled for January 22, 2021.

To be completed by responder

Response Date:

Response by: Mary L. Wolter, Director-Gas Regulatory Planning & Policy

Email Address: mary.wolter@wecenergygroup.com

Phone Number: (414) 221-2374



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/GR-17-563

Requested From: Minnesota Energy Resources Corp.

Type of Inquiry: General

Nonpublic Public

Date of Request: 6/15/2020

Response Due: 6/25/2020

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Angela Byrne

Email Address(es): angela.byrne@state.mn.us

Phone Number(s): 651-539-1820

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 10
Topic: MERC's Use of WEC's Legacy Applications and Innovations
Reference(s): October 4, 2019 Filing, Page 7

Request:

In its filing, MERC stated:

MERC and the other legacy Integrys companies did make an initial investment in ICE that is now being shared with the WEC Legacy Utilities, but this is consistent with all of the other software applications and innovations originally owned/created by WEC that are now being shared with the legacy Integrys companies.

Please provide a list of the WEC applications and innovations that are now shared with MERC for the benefit of Minnesota ratepayers (if a complete list is onerous, a list of the largest applications is sufficient).

Response:

We Energies pre-acquisition Business Applications now shared with MERC include:

- SAP ERP - Finance, Supply Chain, Inventory/Warehousing, Time Entry, Payroll, Benefits
- UI Planner - Financial Planning & Forecasting
- Power Plan Property Accounting
- Power_Plant_Power_Tax
- Value Line Financial Market Valuation
- iAvenue - Large Account CRM
- Aspect Work Force Manager

We Energies pre-acquisition IT Enabling Applications now shared with MERC include:

- Remedy - IT Service Mgmt

To be completed by responder

Response Date:

Response by: Mary L. Wolter, Director-Gas Regulatory Planning & Policy

Email Address: mary.wolter@wecenergygroup.com

Phone Number: (414) 221-2374



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: G011/GR-17-563

Requested From: Minnesota Energy Resources Corp.

Type of Inquiry: General

Nonpublic Public

Date of Request: 6/15/2020

Response Due: 6/25/2020

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Angela Byrne

Email Address(es): angela.byrne@state.mn.us

Phone Number(s): 651-539-1820

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number:	11
Topic:	Breakdown of Upgrade Costs Between Capital and O&M
Reference(s):	October 4, 2019 Filing, Table on Page 8

Request:

Please provide a breakdown of the \$1,946,000 of ICE upgrade costs allocated to MERC between capital and O&M costs. For capital investments, please provide a list of components with their respective useful lives.

Response:

The upgrades referred to above are all capital costs. The component breakdown of this capital investment consists of software and is amortized over a 15-year useful life.

To be completed by responder

Response Date:

Response by: Mary L. Wolter, Director-Gas Regulatory Planning & Policy

Email Address: mary.wolter@wecenergygroup.com

Phone Number: (414) 221-2374

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. G011/GR-17-563

Dated this **30th** day of **July 2020**

/s/Sharon Ferguson

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Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_17- 563_OFF_SL_17- 563_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_17- 563_OFF_SL_17- 563_Official

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